

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Deanna L. Trivett v. Commissioner of Social Security

Trivett · No. 3:25-CV-62-CCB-SJF · Decided March 24, 2026

SUMMARY

The United States District Court for the Northern District of Indiana reviewed Deanna L. Trivett’s challenge to the denial of her application for supplemental security income. The court held that the ALJ properly relied on state agency medical opinions, adequately addressed the record and subjective complaints, and built a logical bridge to the decision; the Commissioner’s decision was affirmed and remand was denied.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Cristal C. Brisco
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	March 24, 2026
DOCKET	3:25-CV-62-CCB-SJF
DISPOSITION	affirmed
PROCEDURAL POSTURE	Action under 42 U.S.C. § 405(g) seeking judicial review and remand of an administrative law judge's denial of supplemental security income.
STANDARD OF REVIEW	The court must affirm the Commissioner's decision if it is supported by substantial evidence and free from legal error. The court reviews the entire record deferentially and may not reweigh evidence, resolve conflicts, make credibility determinations, or substitute its judgment for the Commissioner's. The ALJ must nevertheless build an accurate and logical bridge from the evidence to the conclusion and adequately address evidence contrary to the decision.
PRECEDENTIAL VALUE	unpublished
PARTIES	Deanna L. Trivett v. Commissioner of Social Security

TOPICS

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QUESTIONS PRESENTED

1. Whether the ALJ permissibly relied on state-agency medical opinions that allegedly failed to consider all of the record evidence.
2. Whether subsequent diagnoses rendered the state-agency opinions stale or unreliable.
3. Whether the ALJ failed to build an accurate and logical bridge between the evidence and the determination that Trivett was not disabled.
4. Whether the ALJ improperly failed to include off-task restrictions or credit Trivett's subjective symptom allegations.

HOLDINGS

1. An ALJ may rely on state-agency medical opinions when they are consistent with the record, and the ALJ did not err in finding the opinions sufficiently supported and consistent here.
2. A later diagnosis does not by itself render an earlier medical opinion unreliable; later evidence must be significant and reasonably capable of changing the reviewing physician's opinion. The ALJ permissibly found that Trivett's later diagnoses did not meet that standard.
3. The ALJ did not fail to build an accurate and logical bridge because the decision addressed the asserted conditions and explained why subjective allegations were not fully consistent with objective medical evidence and other record evidence.
4. The ALJ permissibly declined to include off-task restrictions and discounted the weight of subjective symptom allegations that lacked adequate objective support or were inconsistent with other evidence.

KEY QUOTATIONS

“This Court must affirm the ALJ's decision if it is supported by substantial evidence and free from legal error.”

“A reviewing court will not “reweigh evidence, resolve conflicts, decide questions of credibility, or substitute [its] own judgment for that of the Commissioner.””

“Nonetheless, if, after a “critical review of the evidence,” the ALJ's decision “lacks evidentiary support or an adequate discussion of the issues,” this Court will not affirm it.”

“Further, the ALJ “may not select and discuss only that evidence that favors his ultimate conclusion,” but “must confront the evidence that does not support his conclusion and explain why it was rejected,””

“The existence of new diagnoses does not by itself render a prior report unreliable.”

FACTUAL BACKGROUND

Trivett alleged disability beginning when she applied for supplemental security income in May 2022. State-agency medical consultants concluded that she could perform light work with limited use of her left hand, and the ALJ found those opinions largely persuasive. Later records documented conditions including hyponatremia, macrocytosis, atherosclerosis, hives, insomnia, and anxiety, but the treating records did not identify significant functional limitations, and examinations were generally normal apart from scattered hives that appeared responsive to medication.

PROCEDURAL HISTORY

Trivett applied for supplemental security income in May 2022. The application was denied initially and on reconsideration; after a December 2023 hearing, the ALJ denied benefits on January 12, 2024. The Appeals Council denied review on November 18, 2024, and Trivett then filed this action. The district court affirmed the Commissioner's decision and denied remand.

DISPOSITION

affirmed

CASES CITED

- Steele v. Barnhart, 290 F.3d 936, 940 (7th Cir. 2002)
- Kepple v. Massanari, 268 F.3d 513, 516 (7th Cir. 2001)
- Murphy v. Astrue, 496 F.3d 630, 633 (7th Cir. 2007)
- Diaz v. Chater, 55 F.3d 300, 305, 308 (7th Cir. 1995)
- Skinner v. Astrue, 478 F.3d 836, 841 (7th Cir. 2007)
- Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Clifford v. Apfel, 227 F.3d 863, 869 (7th Cir. 2000)
- Dixon v. Massanari, 270 F.3d 1171, 1176-77 (7th Cir. 2001)
- Indoranto v. Barnhart, 374 F.3d 470, 474 (7th Cir. 2004)
- Carlson v. Shalala, 999 F.2d 180, 181 (7th Cir. 1993)
- Stephens v. Heckler, 766 F.2d 284, 287 (7th Cir. 1985)
- Mary Ann R. v. Saul, No. 18 C 1368, 2019 WL 4645445, at *6 (N.D. Ill. Sept. 24, 2019)
- Flener ex rel. Flener v. Barnhart, 361 F.3d 442, 448 (7th Cir. 2004)
- Gentle v. Barnhart, 430 F.3d 865, 868 (7th Cir. 2005)
- Lomax v. Astrue, No. 08 C 3540, 2010 WL 337654, at *14 (N.D. Ill. Jan. 29, 2010)
- Peabody Coal Co. v. Vigna, 22 F.3d 1388, 1393 (7th Cir. 1994)
- Morales v. O'Malley, 103 F.4th 469, 471 (7th Cir. 2024)
- McKinzey v. Astrue, 641 F.3d 884, 891 (7th Cir. 2011)
- Bakke v. Kijakazi, 62 F.4th 1061, 1066-67 (7th Cir. 2023)
- Moreno v. Berryhill, 882 F.3d 722, 728 (7th Cir.)
- Terry v. Astrue, 580 F.3d 471, 475 (7th Cir. 2009)

- Gaylor v. Astrue, 292 F. App'x 506, 512 (7th Cir. 2008)
- Charmaine R. v. Saul, 2021 WL 83737, at *6 (N.D. Ill. Jan. 11, 2021)
- Jill S. v. O'Malley, No. 21 CV 2485, 2024 WL 2292876, at *3 (N.D. Ill. May 21, 2024)
- Hinds v. Saul, 799 Fed. Appx. 396, 400 (7th Cir. 2020)
- Hughes v. Bowen, 679 F. Supp. 782, 784-85 (N.D. Ill. 1988)
- McClanahan v. Saul, No. 1:19-CV-414-HAB, 2020 WL 6144786, at *1-4 (N.D. Ind. Oct. 20, 2020)
- Gribben v. Kijakazi, Case No. 21-1987, 2022 WL 59404, at *2 (7th Cir. Jan. 6, 2022)
- Durham v. Kijakazi, 53 F.4th 1089, 1096 (7th Cir. 2022)
- Buechele v. Colvin, No. 11 C 4348, 2013 WL 1200611, at *16 (N.D. Ill. Mar. 25, 2013)
- Jawad v. Holder, 686 F.3d 400, 404 (7th Cir. 2012)
- Edwards v. Sullivan, 985 F.2d 334, 336-37 (7th Cir. 1993)