

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, NORTHERN DIVISION

Donald L. Burge v. Social Security Administration, Commissioner

Burge · No. 3:25-CV-00130-LPR-ERE · Decided February 19, 2026

SUMMARY

This Recommended Disposition addresses Donald L. Burge’s appeal from the denial of Social Security benefits. The court recommends affirming the Commissioner’s decision, concluding that the ALJ properly evaluated the claimant’s residual functional capacity, hypothetical to the vocational expert, and subjective complaints, and that substantial evidence supports the denial of benefits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Northern Division
DECIDED	February 19, 2026
DOCKET	3:25-CV-00130-LPR-ERE
DISPOSITION	affirmed
PROCEDURAL POSTURE	Recommended disposition on judicial review of the Commissioner of Social Security's final decision denying supplemental security income benefits.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and determines whether it is supported by substantial evidence on the record as a whole. Substantial evidence is evidence sufficient for a reasonable mind to find adequate to support the ALJ's decision; the court considers evidence supporting both the Commissioner's decision and a contrary outcome but will not reverse merely because substantial evidence could support the opposite decision.
PRECEDENTIAL VALUE	Nonprecedential recommended disposition; adoption status not provided
PARTIES	Donald L. Burge v. Social Security Administration, Commissioner

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security

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federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ's step-five vocational hypothetical and residual functional capacity included all limitations supported by the record.
2. Whether the ALJ properly evaluated Burge's subjective complaints concerning seizures, learning disabilities, and left-sided weakness.
3. Whether substantial evidence supported the Commissioner's denial of benefits.

HOLDINGS

1. The ALJ was required to include only impairment-related limitations that the ALJ found credible and that were supported by the evidence; the hypothetical and residual functional capacity adequately accounted for Burge's established physical, seizure-related, and mental limitations.
2. The ALJ properly evaluated Burge's subjective complaints by considering the relevant evidence as a whole, and the complaints were not entirely consistent with the record.
3. The Commissioner's decision was supported by substantial evidence and should be affirmed.

KEY QUOTATIONS

““Substantial evidence” in this context means “enough that a reasonable mind would find [the evidence] adequate to support the ALJ’s decision.”” (Section III.A)

“The hypothetical reflected the limitations which the ALJ found to be credible and was supported by the medical evidence as a whole.” (Section III.C.1)

“The ALJ applied proper legal standards in evaluating Mr. Burge’s claims, and substantial evidence supports the decision to deny benefits.” (Section IV)

FACTUAL BACKGROUND

Burge alleged disability based principally on seizures, a prior cerebrovascular accident, learning disability, mental impairments, and left-sided weakness. The ALJ found multiple severe impairments but determined that Burge retained the residual functional capacity for restricted light work, including simple tasks, limited interaction, seizure-related environmental precautions, and restrictions on reaching and handling. The ALJ relied on periods without reported seizures, conservative treatment, frequently normal neurological and mental-status examinations, and daily activities in finding that Burge was not disabled.

PROCEDURAL HISTORY

Burge applied for benefits on March 2, 2022, alleging limitations from stroke, seizures, learning disability, and post-traumatic stress disorder. His application was denied initially and on reconsideration. After a May 29, 2024 administrative hearing, the ALJ found him not disabled on July 15, 2024, and the Appeals Council denied review. The magistrate judge recommended that the district court affirm the Commissioner's decision and enter judgment for the Commissioner.

DISPOSITION

affirmed

CASES CITED

- Brown v. Colvin, 825 F.3d 936, 939 (8th Cir. 2016)
- Halverson v. Astrue, 600 F.3d 922, 929 (8th Cir. 2010)
- Slusser v. Astrue, 557 F.3d 923, 925 (8th Cir. 2009)
- Milam v. Colvin, 794 F.3d 978, 983 (8th Cir. 2015)
- Long v. Chater, 108 F.3d 185, 187 (8th Cir. 1997)
- Vandenboom v. Barnhart, 421 F.3d 745, 750 (8th Cir. 2005)
- Thomas v. Barnhart, 130 Fed. Appx. 62, 63 (8th Cir. 2005)
- Gwathney v. Chater, 104 F.3d 1043, 1045 (8th Cir. 1997)
- Grindley v. Kijakazi, 9 F.4th 622 (8th Cir. 2021)
- Gowell v. Apfel, 242 F.3d 793, 796 (8th Cir. 2001)
- Andrews v. Colvin, 791 F.3d 923, 929 (8th Cir. 2015)
- Edwards v. Barnhart, 314 F.3d 964, 967 (8th Cir. 2003)
- Buckner v. Astrue, 646 F.3d 549, 560 (8th Cir. 2011)
- Schwandt v. Berryhill, 926 F.3d 1004, 1012 (8th Cir. 2019)
- Smith v. Heckler, 735 F.2d 312, 317 (8th Cir. 1984)
- McKinney v. Apfel, 228 F.3d 860, 863 (8th Cir. 2000)
- McCoy v. Astrue, 648 F.3d 605, 614 (8th Cir. 2011)
- Ostronski v. Chater, 94 F.3d 413, 418 (8th Cir. 1996)