

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Aaron Thomas G. v. Commissioner of Social Security Administration

Case No. 1:24-cv-00572-DKG (D. Idaho Mar. 31, 2026) · No. 1:24-cv-00572-DKG · Decided March 31, 2026

SUMMARY

The United States District Court for the District of Idaho reviews the Commissioner of Social Security’s denial of Aaron Thomas G.’s applications for disability insurance benefits and supplemental security income. The court rejects challenges concerning the evaluation of medical opinion evidence, subjective symptom statements, and third-party statements, concluding that the ALJ’s decision was supported by substantial evidence and affirming the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Debora K. Grasham
JURISDICTION	United States District Court for the District of Idaho
DECIDED	March 31, 2026
DOCKET	1:24-cv-00572-DKG
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying applications for disability insurance benefits and supplemental security income.
STANDARD OF REVIEW	The court must uphold the ALJ's decision unless it is based on legal error or is not supported by substantial evidence. The court reviews the administrative record as a whole, considers only the reasons identified by the ALJ, and may not substitute its judgment for the Commissioner's or affirm on post hoc rationalizations.
PRECEDENTIAL VALUE	unpublished
PARTIES	Aaron Thomas G. v. Commissioner of Social Security Administration

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- ada / disability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the medical opinion evidence.
2. Whether the ALJ properly evaluated Plaintiff's subjective symptom statements.
3. Whether the ALJ properly considered the third-party statements.

HOLDINGS

1. The ALJ properly evaluated Mann's Report of Adapted Behavior Testing under the supportability and consistency factors, and substantial evidence supported the finding that the report was unpersuasive. Any unsupported reference to an unclear testing technique was harmless because the ALJ provided other valid reasons.
2. The ALJ's RFC assessment was consistent with and adequately incorporated Stephenson's credited limitations; an RFC need not mirror a medical opinion so long as it is consistent with the opined limitations and is based on the record as a whole.
3. The ALJ was not required to evaluate the persuasiveness of the assessments because they did not contain opinions about Plaintiff's work-related functional limitations.
4. The ALJ provided clear and convincing reasons supported by substantial evidence for finding that Plaintiff's statements concerning the intensity, persistence, and limiting effects of his symptoms were inconsistent with the record.
5. The ALJ adequately considered the third-party statements and provided legally sufficient reasons for rejecting them by relying on the same valid reasons used to reject Plaintiff's similar subjective symptom statements.

KEY QUOTATIONS

“the level of limitation opined far exceeds treatment notes and the claimant’s daily activities” (AR 25)

“While the claimant’s medication and counseling were assisting with his symptoms, the record also shows that the claimant still has difficulty with social interactions and adaptive functioning” (AR 23)

FACTUAL BACKGROUND

Plaintiff alleged disability based on autism, depression, anxiety, ADHD, and irritable bowel syndrome. The ALJ found severe impairments of autism spectrum disorder, ADHD, major depressive disorder, and cannabis use disorder, but found irritable bowel syndrome non-severe. The ALJ determined that Plaintiff retained the capacity for work at all exertional levels subject to social, environmental, production-rate, and routine-change limitations, and found that he could perform past relevant work and alternative unskilled jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff filed applications for disability insurance benefits and supplemental security income alleging disability beginning June 1, 2020. The applications were denied initially and on reconsideration. After a March 28, 2024 hearing, the ALJ issued a May 1, 2024 decision finding Plaintiff not disabled. The Appeals Council denied review, and Plaintiff filed this action on November 27, 2024. The district court affirmed the Commissioner's decision and dismissed the complaint.

DISPOSITION

affirmed

CASES CITED

- Lounsbury v. Barnhart, 468 F.3d 1111, 1114 (9th Cir. 2006)
- Tackett v. Apfel, 180 F.3d 1094, 1098-99 (9th Cir. 1999)
- Revels v. Berryhill, 874 F.3d 648, 654 (9th Cir. 2017)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Orn v. Astrue, 495 F.3d 625, 630 (9th Cir. 2007)
- Garrison v. Colvin, 759 F.3d 995, 1009-10, 1012-13, 1017 (9th Cir. 2014)
- Lewis v. Apfel, 236 F.3d 503, 511, 517 n.13 (9th Cir. 2001)
- Bray v. Commissioner of Social Security Administration, 554 F.3d 1219, 1225-26 & n.7 (9th Cir. 2009)
- Carmickle v. Commissioner of Social Security Administration, 533 F.3d 1155, 1160, 1165 (9th Cir. 2008)
- Verduzco v. Apfel, 188 F.3d 1087, 1089 (9th Cir. 1999)
- Woods v. Kijakazi, 32 F.4th 785, 787, 791-92 (9th Cir. 2022)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1103 (9th Cir. 2014)
- Bunnell v. Sullivan, 947 F.2d 341, 346 (9th Cir. 1991)
- Morgan v. Commissioner of Social Security, 169 F.3d 595, 599-600 (9th Cir. 1999)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1174-75 (9th Cir. 2008)
- Martin v. Commissioner of Social Security Administration, 472 F. App'x 580 (9th Cir. 2012)
- Neufeld v. Berryhill, 2018 WL 4739699, at *6 (C.D. Cal. Sept. 30, 2018)
- Leach v. Kijakazi, 70 F.4th 1251, 1256 (9th Cir. 2023)
- Smartt v. Kijakazi, 53 F.4th 489, 499 (9th Cir. 2022)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035-38, 1040 (9th Cir. 2007)
- Brown-Hunter v. Colvin, 806 F.3d 487, 493-94 (9th Cir. 2015)
- Laborin v. Berryhill, 867 F.3d 1151, 1155 (9th Cir. 2017)
- Dodrill v. Shalala, 12 F.3d 915, 918 (9th Cir. 1993)
- Thomas v. Barnhart, 278 F.3d 947, 959 (9th Cir. 2002)
- Wellington v. Berryhill, 878 F.3d 867, 876 (9th Cir. 2017)

- Warre v. Commissioner of Social Security Administration, 439 F.3d 1001, 1006 (9th Cir. 2006)
- Attmore v. Colvin, 827 F.3d 872, 878 (9th Cir. 2016)
- Valentine v. Commissioner of Social Security, 574 F.3d 685, 694 (9th Cir. 2009)
- Apple v. Bisignano, 2025 WL 1525314, at *3 (9th Cir. May 29, 2025)
- Stephens v. Kijakazi, 2023 WL 6937296, at *2 (9th Cir. Oct. 20, 2023)
- Fryer v. Kijakazi, 2022 WL 17958630 (9th Cir. Dec. 27, 2022)
- Hudnall v. Dudek, 130 F.4th 668, 671 (9th Cir. 2025), vacated and withdrawn, 133 F.4th 968 (9th Cir. Apr. 7, 2025)
- Jordan Zachary B. v. Bisignano, 2025 WL 2306144, at *6 (D. Idaho Aug. 11, 2025)
- Burns v. Commissioner of Social Security, 2024 WL 577216, at *6 n.7 (D. Ariz. Feb. 12, 2024)
- Zachary Devin R. v. Commissioner of Social Security, 2025 WL 2696980, at *6 (D. Idaho Sept. 22, 2025)
- Kimberly A. v. Kijakazi, 2022 WL 19203, at *6 (D. Or. Jan. 3, 2022)