

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Andrew G. v. Frank Bisignano, Commissioner, Social Security
Administration

Andrew G. v. Bisignano, Civil No. 25-0482-DRM (D. Md. Mar. 24, 2026) · No. Civil No. 25-0482-DRM ·
Decided March 24, 2026

SUMMARY

The United States District Court for the District of Maryland reviewed the Social Security Administration’s denial of Andrew G.’s claim for Supplemental Security Income benefits. The court held that the Administrative Law Judge improperly relied on objective indicators, including mental-status examinations, to discount the severity of symptoms associated with depression, contrary to Fourth Circuit precedent. The court reversed the Commissioner’s decision and remanded the case for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Douglas R. Miller
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 24, 2026
DOCKET	Civil No. 25-0482-DRM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying Plaintiff's application for Supplemental Security Income benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ's factual findings are supported by substantial evidence and whether the ALJ applied the correct legal standards. Substantial evidence is evidence that a reasoning mind would accept as sufficient to support a conclusion; it is more than a scintilla but may be less than a preponderance.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive but nonprecedential.
PARTIES	Andrew G. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ improperly discounted Plaintiff's subjective symptoms of depression by relying on objective medical evidence and related clinical indicators.
2. Whether the ALJ's residual functional capacity assessment and step-five findings were supported by substantial evidence.

HOLDINGS

1. An ALJ may not rely on objective medical evidence, including normal clinical or mental-status findings, even as one of multiple factors, to discount a claimant's subjective complaints regarding symptoms of chronic depression.
2. The Commissioner's decision was reversed because of inadequate analysis and the case was remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

KEY QUOTATIONS

"At the second step, "there need not be objective evidence of the pain [or symptoms] itself or its intensity.""
(Page 4)

"Because "disability benefits can be awarded on the sole basis of an objective impairment and derivative subjective pain" or symptoms, a claimant may "rely exclusively on subjective evidence" at the second step."
(Page 4)

"we join those circuits by holding that ALJs may not rely on objective medical evidence (or the lack thereof)—even as just one of multiple factors—to discount a claimant's subjective complaints regarding symptoms of fibromyalgia or some other disease that does not produce such evidence." (Page 5)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning April 29, 2020, based principally on mental-health impairments, including schizoaffective disorder, antisocial personality disorder, anxiety, PTSD, and depression, along with COPD/asthma and obesity. The ALJ found that Plaintiff had severe impairments but retained the residual functional capacity for restricted light work involving simple, routine, repetitive tasks and limited workplace interaction. In evaluating Plaintiff's subjective symptoms, the ALJ relied in part on objective medical evidence, generally normal mental-status examinations, and a consultative examination noting normal dress and hygiene and a 25/30 MMSE score. The district court held that this treatment of symptoms of depression contravened Fourth Circuit precedent.

PROCEDURAL HISTORY

Plaintiff applied for Title XVI Supplemental Security Income benefits on May 8, 2020. The claim was denied initially and on reconsideration; following a January 20, 2022 hearing, the ALJ found Plaintiff not disabled on February 3, 2022. The Appeals Council denied review, and Plaintiff filed this action on February 14, 2025. The case was referred to Magistrate Judge Douglas R. Miller with the parties' consent. The court reversed the Commissioner's decision and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded for further proceedings consistent with the opinion, including reconsideration of the evaluation of Plaintiff's subjective symptoms of depression. The court did not direct a finding of disability or benefits and expressed no opinion on the ultimate merits of the Commissioner's conclusion.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Kiser v. Saul, 821 F. App'x 211, 212 (4th Cir. 2020)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439-40 (4th Cir. 1997)
- DeLoatch v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Arakas v. Comm'r, Soc. Sec. Admin., 983 F.3d 83, 95-97 (4th Cir. 2020)
- Shelley C. v. Comm'r of Soc. Sec. Admin., 61 F.4th 341, 360-61 (4th Cir. 2023)
- Walker v. Bowen, 889 F.2d 47, 49 (4th Cir. 1989)
- Oakes v. Kijakazi, 70 F.4th 207, 215 (4th Cir. 2023)
- Lasharne W. v. Comm'r, Soc. Sec. Admin., No. SAG-21-2603, 2023 WL 2414497, at *4 (D. Md. Mar. 8, 2023)
- Kimberly S. v. Comm'r, Soc. Sec., No. EA-23-1404, 2024 WL 5007372, at *7 (D. Md. Dec. 3, 2024)