

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, TAMPA DIVISION

Clint Jervis v. Frank Bisignano, Commissioner of Social Security

Jervis · No. 8:24-cv-02751-AEP · Decided February 25, 2026

SUMMARY

The court reviewed the denial of Clint Jervis's claim for Supplemental Security Income under the substantial-evidence and correct-legal-standards framework. It rejected challenges to the ALJ's RFC limitation to simple work, the ALJ's discussion of the evidence, and the alleged failure to develop the record. The court affirmed the Commissioner's decision and directed the Clerk to enter final judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Tampa Division
JURISDICTION	United States District Court for the Middle District of Florida, Tampa Division
DECIDED	February 25, 2026
DOCKET	8:24-cv-02751-AEP
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner of Social Security's denial of his SSI claim. The district court reviewed the administrative decision and affirmed it.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and whether the correct legal standards were applied. The court gives deference to factual findings, does not reweigh the evidence or substitute its judgment for that of the ALJ, and reviews legal conclusions de novo.
PRECEDENTIAL VALUE	Unpublished district court order; limited precedential value.
PARTIES	Clint Jervis v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

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PRACTICE AREAS

Social Security law

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ's RFC limitation to simple work was impermissibly vague or failed to account for Plaintiff's moderate limitations in understanding, remembering, or applying information and in concentrating, persisting, or maintaining pace.
2. Whether the ALJ's discussion of the evidence was inadequate to permit meaningful judicial review or improperly relied on selectively chosen evidence.
3. Whether the ALJ failed to develop the record by not obtaining a mental-health opinion or consultative mental-status examination.

HOLDINGS

1. The ALJ's limitation of Plaintiff to simple, unskilled work adequately accounted for his moderate limitations in understanding, remembering, or applying information and in concentrating, persisting, or maintaining pace.
2. The ALJ's discussion of the evidence was sufficient because the decision as a whole explained the basis for the RFC determination and was supported by substantial evidence; the ALJ was not required to discuss every piece of evidence individually.
3. The ALJ did not violate the duty to develop the record by failing to obtain a mental-health opinion or consultative mental-status examination.

KEY QUOTATIONS

““Substantial evidence is more than a scintilla and is such relevant evidence as a reasonable person would accept as adequate to support a conclusion.”” (Section II)

““The ALJ clarifies that Plaintiff can perform ‘unskilled’ work at the medium exertional level as defined by 20 C.F.R. § 416.968(a) because this work consists of ‘simple duties,’ which are “‘duties that can be learned on the job in a short period of time’ and which require ‘little or no judgment.’””” (Section III.A)

““A breach of the duty to develop the record requires remand only if the ALJ’s failure to develop the record led to evidentiary gaps in the record, which resulted in unfairness or clear prejudice.”” (Section III.C)

FACTUAL BACKGROUND

Plaintiff, born in 1967, alleged disability beginning November 4, 2021 based on hearing loss, PTSD, bipolar disorder, ADHD, and schizophrenia. The ALJ found severe impairments including obesity, degenerative changes in the shoulders and right knee, PTSD, schizoaffective disorder, mood disorder, and substance abuse, but determined that Plaintiff retained the capacity for medium work limited to simple, unskilled work. Although Plaintiff could not perform his past work as a pipefitter helper, the ALJ found that significant numbers of other jobs existed in the national economy that he could perform.

PROCEDURAL HISTORY

Plaintiff applied for a period of disability, DIB, and SSI. The SSA denied the claims initially and on reconsideration; following a hearing, an ALJ found Plaintiff not disabled, and the Appeals Council denied review. Plaintiff then filed this action, and the district court affirmed the Commissioner's decision and directed the Clerk to enter final judgment for the Commissioner.

DISPOSITION

affirmed

CASES CITED

- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Winschel v. Commissioner of Social Security, 631 F.3d 1176, 1178, 1180-81 (11th Cir. 2011)
- Ingram v. Commissioner of Social Security, 496 F.3d 1253, 1260 (11th Cir. 2007)
- Bloodsworth v. Heckler, 703 F.2d 1233, 1239 (11th Cir. 1983)
- Wilson v. Barnhart, 284 F.3d 1219, 1221 (11th Cir. 2002) (per curiam)
- Maloy v. Commissioner of Social Security, No. 8:15-CV-2587-T-JSS, 2017 WL 382724, at *5 (M.D. Fla. Jan. 27, 2017)
- Mijenes v. Commissioner of Social Security, 687 F. App'x 842, 845-46 (11th Cir. 2017)
- Enriquez v. O'Malley, No. 8:23-CV-0374-TPB-SPF, 2024 WL 533150, at *5 (M.D. Fla. Jan. 24, 2024), report and recommendation adopted, No. 8:23-CV-374-TPB-SPF, 2024 WL 519764 (M.D. Fla. Feb. 9, 2024)
- Cowart v. Schweiker, 662 F.2d 731, 735 (11th Cir. 1981)
- McCruter v. Bowen, 791 F.2d 1544, 1548 (11th Cir. 1986)
- Dyer v. Barnhart, 395 F.3d 1206, 1211 (11th Cir. 2005)
- Foote v. Chater, 67 F.3d 1553, 1561 (11th Cir. 1995)
- Sanchez v. Berryhill, No. 1:17-CV-163-GRJ, 2018 WL 7351685, at *10 (N.D. Fla. June 29, 2018)
- Adonis C. v. Commissioner, Social Security Administration, No. 1:21-CV-658-AT, 2022 WL 17488711, at *5 (N.D. Ga. Sept. 19, 2022)
- Ellison v. Barnhart, 355 F.3d 1272, 1276 (11th Cir. 2004)
- Rosen v. Commissioner of Social Security, No. 5:19-CV-516-PRL, 2021 WL 9802333, at *4 (M.D. Fla. Mar. 8, 2021)
- Williams v. Commissioner of Social Security, 703 F. App'x 780, 783 (11th Cir. 2017)
- Larry v. Commissioner of Social Security, 506 F. App'x 967, 969 (11th Cir. 2013)
- Graham v. Apfel, 129 F.3d 1420, 1423 (11th Cir. 1997)
- Moore v. Social Security Administration, Commissioner, 649 F. App'x 941, 945 (11th Cir. 2016)
- Castle v. Colvin, 557 F. App'x 849, 853-54 (11th Cir. 2014)
- Martin v. Commissioner of Social Security, No. 8:22-CV-1435-JSS, 2023 WL 3644419, at *4 (M.D. Fla. May 25, 2023)

- **Beegle v. Commissioner of Social Security Administration**, 482 F. App'x 483, 486 (11th Cir. 2012)

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