

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

Natalie O. v. Frank Bisignano

Natalie O. · No. 1:25-cv-00292-MJD-JPH · Decided March 12, 2026

SUMMARY

The United States District Court for the Southern District of Indiana reviews the denial of Natalie O.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court rejects her arguments concerning the alleged failure to recognize agoraphobia with panic disorder, the step-three listings analysis, the subjective symptom evaluation, and the residual functional capacity assessment. The court affirms the Commissioner's decision.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Mark J. Dinsmore
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	March 12, 2026
DOCKET	1:25-cv-00292-MJD-JPH
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner's final decision denying applications for Disability Insurance Benefits and Supplemental Security Income.
STANDARD OF REVIEW	The court reviews the ALJ's decision deferentially and affirms if it is supported by substantial evidence. The court does not reweigh the evidence, but requires an adequate discussion of the issues and an accurate and logical bridge from the evidence to the ALJ's conclusions. Subjective-symptom findings are reversed only if patently wrong.
PRECEDENTIAL VALUE	Unpublished district court opinion; persuasive value only
PARTIES	Natalie O. v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action

administrative law

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PRACTICE AREAS

Social Security disability benefits

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QUESTIONS PRESENTED

1. Whether the ALJ's failure to expressly identify agoraphobia with panic disorder as a medically determinable impairment at step two required remand.
2. Whether the ALJ adequately evaluated the claimant's mental impairments at step three and properly determined that they did not meet or medically equal a listed impairment.
3. Whether the ALJ's subjective-symptom analysis was patently wrong because it relied on treatment noncompliance without adequately considering reasons for noncompliance, daily activities, or the waxing and waning of chronic conditions.
4. Whether the ALJ's RFC and vocational-expert hypothetical improperly omitted a limitation on interacting with the public.

HOLDINGS

1. An ALJ's failure to recognize an impairment at step two does not necessarily require remand when the ALJ proceeds through the remaining steps and considers the impairment's limiting effects later in the evaluation.
2. The ALJ's step-three analysis was sufficient because it was more than perfunctory and, when read together with the RFC discussion, adequately explained why the claimant's impairments did not meet or medically equal a listing.
3. The ALJ's subjective-symptom analysis was not patently wrong.
4. The ALJ did not err by omitting a specific public-interaction limitation from the RFC and vocational-expert hypothetical.

KEY QUOTATIONS

"Substantial evidence is "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion."" (Section II)

"The question on judicial review is not merely whether there was a step two error, but instead whether that step two error caused the ALJ to err in the remaining steps of the evaluative process as well" (Section IV-A)

"Ultimately, the ALJ considered Claimant's daily activities as one factor among many in conducting the subjective symptom analysis." (Section IV-C)

FACTUAL BACKGROUND

Natalie O. alleged disability based on multiple sclerosis, optic neuritis, obesity, anxiety, depression, PTSD, ADHD, polysubstance abuse in remission, and agoraphobia with panic disorder. The ALJ found that she had

severe impairments, but retained the residual functional capacity for light work with restrictions to simple work, brief supervision and coworker interactions, and routine changes. The ALJ concluded that she could perform her past relevant work as a housekeeping cleaner. The district court found that the ALJ considered the effects of agoraphobia and panic disorder at later steps, properly evaluated her symptoms and activities, and adequately supported the RFC.

PROCEDURAL HISTORY

Natalie O. applied for DIB and SSI in August 2021, alleging disability beginning November 11, 2016. The applications were denied initially and on reconsideration. After a December 1, 2023 hearing, the ALJ found on January 11, 2024, that she was not disabled; the Appeals Council denied review on December 20, 2024. She filed this action on February 13, 2025. The district court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Crump v. Saul, 932 F.3d 567, 570 (7th Cir. 2019)
- Varga v. Colvin, 794 F.3d 809, 813 (7th Cir. 2015)
- Young v. Barnhart, 362 F.3d 995, 1000 (7th Cir. 2004)
- Deborah M. v. Saul, 994 F.3d 785, 788, 790-91 (7th Cir. 2021)
- Clifford v. Apfel, 227 F.3d 863, 872-73 (7th Cir. 2000)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Lopez ex rel. Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Hickman v. Apfel, 187 F.3d 683, 688-89 (7th Cir. 1999)
- Moy v. Bisignano, 142 F.4th 546, 552 (7th Cir. 2025)
- Castile v. Astrue, 617 F.3d 923, 926-27 (7th Cir. 2010)
- Curvin v. Colvin, 778 F.3d 645, 649-50 (7th Cir. 2015)
- Ridinger v. Astrue, 589 F. Supp. 2d 995, 1004 (N.D. Ill. 2008)
- Olson v. Colvin, 2014 WL 4792117, at *5 (W.D. Wis. Sept. 24, 2014)
- Staley v. Colvin, 2016 WL 7447734, at *2-3 (S.D. Ind. Dec. 28, 2016)
- Jeske v. Saul, 955 F.3d 583, 588 (7th Cir. 2020)
- Spath v. Hayes Wheels Int'l-Ind., Inc., 211 F.3d 392, 397 (7th Cir. 2000)
- Burmester v. Berryhill, 920 F.3d 507, 510 (7th Cir. 2019)
- Prill v. Kijakazi, 23 F.4th 738, 748 (7th Cir. 2022)
- Larson v. Astrue, 615 F.3d 744, 751 (7th Cir. 2010)

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