

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

Farha Z.B. v. Frank Bisignano, Commissioner of Social Security

Farha Z.B. · No. No. 23 CV 2999 · Decided February 2, 2026

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the Commissioner of Social Security’s denial of Farha Z.B.’s disability benefits application under 42 U.S.C. § 405(g). The court held that the Administrative Law Judge adequately evaluated the medical opinions under the supportability and consistency factors and that substantial evidence supported the decision. The court denied the request for remand and affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Young B. Kim
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	February 2, 2026
DOCKET	No. 23 CV 2999
DISPOSITION	affirmed
PROCEDURAL POSTURE	Action under 42 U.S.C. § 405(g) seeking judicial review of the Commissioner's final decision denying disability benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence. The court may not reweigh the evidence or substitute its judgment for the ALJ's and may reverse only if the record compels a contrary result.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order from a federal district court.
PARTIES	Farha Z.B. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated Dr. Abraham's medical opinion under the supportability and consistency factors.
2. Whether the ALJ's decision was supported by substantial evidence.

HOLDINGS

1. The ALJ properly considered the supportability and consistency of Dr. Abraham's opinion and adequately explained why the opinion was not persuasive.
2. The ALJ's finding that Farha was not disabled was supported by substantial evidence, and remand was not warranted.

KEY QUOTATIONS

“When reviewing the ALJ’s decision, the court asks only whether the ALJ applied the correct legal standards and the decision has the support of substantial evidence” (Analysis)

“This deferential standard precludes the court from reweighing evidence or substituting its judgment for the ALJ’s, allowing reversal “only if the record compels” it.” (Analysis)

“The supportability factor requires consideration of the objective medical evidence and explanations the medical source offered” (Analysis)

FACTUAL BACKGROUND

Farha alleged disability based on a combination of physical and mental impairments, including joint, back, neck, shoulder, neuropathy, and fibromyalgia-related symptoms. Her primary care physician, Dr. Amira Abraham, issued a physical residual functional capacity assessment limiting Farha to lifting no more than ten pounds, standing or walking less than two hours, and performing only limited postural and manipulative activities. The ALJ found Dr. Abraham's opinion unpersuasive and instead found the state-agency reviewing physicians' opinions persuasive, with adjustments based on updated evidence and testimony. The medical record included largely unremarkable diagnostic studies and examinations, except for a shoulder MRI, and reflected conservative treatment during the relevant period.

PROCEDURAL HISTORY

Farha applied for disability benefits, amended her alleged onset date, and received an administrative hearing before an ALJ. The ALJ found her not disabled, and the Appeals Council denied review. After the action was filed, the parties consented to the magistrate judge's jurisdiction. The court denied remand and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *Burmester v. Berryhill*, 920 F.3d 507, 510 (7th Cir. 2019)
- *Biestek v. Berryhill*, 139 S. Ct. 1148, 1154 (2019)
- *Deborah M. v. Saul*, 994 F.3d 785, 788 (7th Cir. 2021)
- *Lothridge v. Saul*, 984 F.3d 1227, 1233 (7th Cir. 2021)
- *Warnell v. O'Malley*, 97 F.4th 1050, 1054 (7th Cir. 2024)
- *Moore v. Colvin*, 743 F.3d 1118, 1121 (7th Cir. 2014)
- *Albert v. Kijakazi*, 34 F.4th 611, 614 (7th Cir. 2022)
- *Pepper v. Colvin*, 712 F.3d 351, 362 (7th Cir. 2013)
- *Brown v. Colvin*, 661 Fed. Appx. 894, 895 (7th Cir. 2016)

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