

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

Michelle Lynn Venaziano v. Commissioner of Social Security

Venaziano · No. 3:25-CV-01165-JJH · Decided April 22, 2026

SUMMARY

This Report and Recommendation addresses Michelle Lynn Venaziano’s challenge to the Commissioner of Social Security’s denial of her applications for Disability Insurance Benefits, Supplemental Security Income, and a period of disability. The magistrate judge recommends affirming the Commissioner’s decision, concluding that the administrative law judge’s residual functional capacity assessment and evaluation of medical and state-agency opinions were supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Jonathan D. Greenberg
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	April 22, 2026
DOCKET	3:25-CV-01165-JJH
DISPOSITION	affirmed
PROCEDURAL POSTURE	Report and recommendation on judicial review of the Commissioner's final decision denying applications for a Period of Disability, Disability Insurance Benefits, and Supplemental Security Income.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and made under proper legal standards. It does not reweigh evidence, make credibility determinations, or review the evidence de novo, and must review the record as a whole.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Michelle Lynn Venaziano v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment adequately accounted for the state-agency psychologists' limitation to superficial interaction.
2. Whether the ALJ properly evaluated the persuasiveness of Dr. Ahmed's medical opinion under the revised Social Security medical-opinion regulations.
3. Whether substantial evidence and proper legal standards supported the Commissioner's determination that Venaziano was not disabled.

HOLDINGS

1. The ALJ adequately explained the partially persuasive treatment of the state-agency psychologists' opinions and sufficiently accounted for the supported social-interaction limitations through restrictions including occasional interaction, less-than-occasional interaction outside the scope of employment, and avoidance of tandem work.
2. The ALJ adequately considered the supportability and consistency of Dr. Ahmed's opinion and reasonably found it only partially persuasive.
3. The Commissioner's final decision denying benefits was supported by substantial evidence and applied proper legal standards; the magistrate judge therefore recommended affirmance.

KEY QUOTATIONS

“No principle of administrative law or common sense requires us to remand a case in quest of a perfect opinion unless there is reason to believe that the remand might lead to a different result.” (Tr. 35)

“Tandem tasks “logically require more than superficial interpersonal contact. This is a restriction on the quality of interpersonal contact.”” (Tr. 36)

FACTUAL BACKGROUND

Venaziano alleged disability based primarily on bipolar disorder, severe depression, personality disorder, and anxiety, later amending her alleged onset date to June 1, 2021. The medical record reflected recurring anxiety and depressive symptoms, medication changes, counseling, and generally normal cognition and thought processes on examinations, with periods of improvement, stable mood, increased activity, and no breakthrough anxiety. A treating psychiatrist offered an extreme, work-preclusive functional assessment, while state-agency psychologists found moderate mental limitations and capacity for work with restrictions. The ALJ found severe physical and mental impairments but determined that Venaziano could perform restricted light work and other jobs existing in significant numbers.

PROCEDURAL HISTORY

Venaziano applied for disability benefits in February 2023. After the applications were denied initially and on reconsideration, an ALJ held a hearing on May 2, 2024, and found her not disabled. The Appeals Council denied review on April 30, 2025, making the ALJ's decision final. Venaziano filed this action under 42 U.S.C. § 405(g), and the parties completed briefing. The magistrate judge recommended affirming the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Kirk v. Secretary of Health & Human Services, 667 F.2d 524 (6th Cir. 1981)
- Ealy v. Commissioner of Social Security, 594 F.3d 504, 512 (6th Cir. 2010)
- Abbott v. Sullivan, 905 F.2d 918, 923 (6th Cir. 1990)
- Mullis v. Bowen, 861 F.2d 991, 994 (6th Cir. 1988)
- Henry v. Gardner, 381 F.2d 191, 195 (6th Cir. 1967)
- Reynolds v. Commissioner of Social Security, 424 F. App'x 411, 414 (6th Cir. 2011)
- White v. Commissioner of Social Security, 572 F.3d 272, 281 (6th Cir. 2009)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 241 (6th Cir. 2007)
- Cutlip v. Secretary of Health and Human Services, 25 F.3d 284, 286 (6th Cir. 1994)
- Brainard v. Secretary of Health & Human Services, 889 F.2d 679, 681 (6th Cir. 1989)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 535 (6th Cir. 2001)
- Buxton v. Halter, 246 F.3d 762, 772-73 (6th Cir. 2001)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Baker v. Heckler, 730 F.2d 1147, 1150 (8th Cir. 1984)
- Her v. Commissioner of Social Security, 203 F.3d 388, 389-90 (6th Cir. 1999)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- Sarchet v. Chater, 78 F.3d 305, 307 (7th Cir. 1996)
- Kearns v. Commissioner of Social Security, No. 3:19-cv-01243, 2020 WL 2841707 (N.D. Ohio Feb. 3, 2020)
- Collins v. Commissioner of Social Security, No. 3:17 CV 2059 (N.D. Ohio Dec. 7, 2018)
- Romo v. Commissioner of Social Security, Case No. 3:20-CV-01557-JGC, 2021 WL 5040385 (N.D. Ohio July 9, 2021)
- Reeves v. Commissioner of Social Security, 618 F. App'x 267, 275 (6th Cir. 2015)
- Buck v. Commissioner of Social Security, 2023 WL 3978288 (N.D. Ohio June 13, 2023)
- Acoff v. Commissioner of Social Security, 2019 WL 2359878 (N.D. Ohio)
- Fisher v. Bowen, 869 F.2d 1055, 1057 (7th Cir. 1989)
- NLRB v. Wyman-Gordon Co., 394 U.S. 759, 766 n.6 (1969)

- Dodson v. Commissioner of Social Security, Case No. 5:18-CV-02263, 2019 WL 6841771 (N.D. Ohio Dec. 16, 2019)

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