

United States Court of Appeals for the Fifth Circuit

No. 26-30270
Summary Calendar

United States Court of Appeals
Fifth Circuit

FILED

October 5, 2026

Thomas B. Plunkett, III
Clerk

TYKITA CLARK,

Plaintiff—Appellant,

versus

FRANK BISIGNANO, *Commissioner of Social Security Administration,*

Defendant—Appellee.

Appeal from the United States District Court
for the Middle District of Louisiana
USDC No. 3:24-CV-968

Before WILLETT, DUNCAN, and ENGELHARDT, *Circuit Judges.*

PER CURIAM:*

Pro se appellant Tykita Clark appeals from the district court's affirmation of the denial of her claim for Social Security benefits. We AFFIRM.

* This opinion is not designated for publication. *See* 5TH CIR. R. 47.5.

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I.

“We review the Commissioner’s denial of social security benefits ‘only to ascertain whether (1) the final decision is supported by substantial evidence and (2) whether the Commissioner used the proper legal standards to evaluate the evidence.’” *Madkins v. Bisignano*, 150 F.4th 657, 662 (5th Cir. 2025) (citations omitted). “Substantial evidence is merely enough that a reasonable mind could arrive at the same decision; though the evidence ‘must be more than a scintilla, it need not be a preponderance.’” *Id.* (citation modified). “A finding of no substantial evidence is appropriate only if no credible evidentiary choices or medical findings support the decision.” *Salmond v. Berryhill*, 892 F.3d 812, 819 (5th Cir. 2018) (citation omitted). “Any findings of fact by the Commissioner which are supported by substantial evidence are conclusive.” *Taylor v. Astrue*, 706 F.3d 600, 602 (5th Cir. 2012). “We will not ‘re-weigh the evidence’ nor, in the event of evidentiary conflict or uncertainty, will we ‘substitute our judgment for the Commissioner’s, even if we believe the evidence weighs against the Commissioner’s decision.’” *Madkins*, 150 F.4th at 663 (citation omitted).

II.

On appeal, Clark raises multiple arguments to support her assertion that the district court erred in finding that substantial evidence supported the Commissioner’s final decision.

Although we liberally construe *pro se* briefs, “*pro se* parties must still brief the issues and reasonably comply with the standards of Rule 28.” *Grant v. Cuellar*, 59 F.3d 523, 524 (5th Cir. 1995). Federal Rule of Appellate Procedure 28 requires that an appellant’s brief contain the appellant’s “contentions and the reasons for them, with citations to the authorities and parts of the record on which the appellant relies.” FED. R. APP. P. 28(a)(8)(A); *see also* 5TH CIR. R. 28.2.2 (“Every assertion in briefs

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regarding matter in the record must be supported by a reference to the page number of the original record . . . where the matter is found using the record citation form as directed by the Clerk of Court.”). “A party may forfeit an argument through inadequate briefing in several ways, such as by failing to ‘offer any . . . citation to authority’ or by failing to ‘offer record citations.’” *Schnell v. State Farm Lloyds*, 98 F.4th 150, 161 (5th Cir. 2024) (quoting *Rollins v. Home Depot USA*, 8 F.4th 393, 397 & n.1 (5th Cir. 2021)). This holds true for *pro se* appellants in Social Security appeals. See *Cornett v. Astrue*, 261 F. App’x 644, 650–51 (5th Cir. 2008).

Clark’s principal brief contains no citations to the record, nor citations to authorities supporting her arguments.¹ Although Clark’s reply brief contains citations to the record and to authorities, this does not save her arguments. See *United States v. Barnes*, 979 F.3d 283, 304 (5th Cir. 2020) (declining to consider an issue where the defendant fully addressed the merits of the argument only in his reply brief because “[i]t is well settled in this circuit that ‘a defendant waives an issue if he fails to adequately brief it’”). Accordingly, Clark has inadequately briefed, and therefore forfeited, her arguments.

Nevertheless, we have considered the record on appeal, the briefs of the parties, and the applicable law, and we find that the Commissioner applied the proper legal standards and substantial evidence supports his findings.

AFFIRMED.

¹ The Table of Authorities in Clark’s brief contains several cases, but none of these cases can be found in the body of her brief. Additionally, Clark’s brief contains a few citations to statutory and regulatory provisions, but these citations serve only to outline background rules and fail to provide substantive support for the arguments asserted.