

OHIO COURT OF APPEALS, SIXTH APPELLATE DISTRICT

In re T.L.

2026-Ohio-2118 · No. H-25-015 · Decided June 5, 2026

SUMMARY

The Sixth District Court of Appeals of Ohio affirmed an order awarding legal custody of a dependent child to the mother and granting the father supervised visitation at least once per month. The court held that the visitation order was not an abuse of discretion and was not impermissibly vague or violative of the father’s or child’s due process rights. The court also stated that the father could seek additional visitation orders or contempt remedies if the mother failed to comply.

CASE DETAILS

COURT	Ohio Court of Appeals, Sixth Appellate District
WRITING FOR THE COURT	Myron C. Duhart, J.; Thomas J. Osowik, P.J.; Christine E. Mayle, J.
JURISDICTION	Ohio Court of Appeals, Sixth Appellate District, Huron County
DECIDED	June 5, 2026
DOCKET	H-25-015
DISPOSITION	affirmed
PROCEDURAL POSTURE	Father appealed from a judgment of the Huron County Court of Common Pleas, Juvenile Division, awarding legal custody of the child to mother and granting father supervised visitation.
STANDARD OF REVIEW	A visitation order is reviewed for abuse of discretion. An abuse of discretion occurs when the judgment is unreasonable, arbitrary, or unconscionable. Because father asserted infringement of a fundamental parental right, the court also applied strict scrutiny to the due-process challenge.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals decision
PARTIES	T.L., father v. Richard Palau, appellee

TOPICS

- visitation
- child custody
- procedural due process
- substantive due process
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the juvenile court abused its discretion by ordering father to have at least one supervised visit with the child per month without specifying the duration of each visit.
2. Whether the visitation order was impermissibly vague and violated father's or the child's substantive due process rights.
3. Whether the juvenile court properly restricted visitation based on the child's best interest, the child's young age, father's inconsistent visitation, failure to communicate with the agency, and failure to complete case-plan services.

HOLDINGS

1. The juvenile court did not abuse its discretion by ordering father to have at least one supervised visit per month, with the possibility of additional visitation after he demonstrated a consistent pattern of healthy and meaningful visits.
2. The visitation order was not impermissibly vague and did not violate father's or the child's due process rights.
3. Father's claim that the order improperly gave mother sole control over visitation was meritless because it was based on speculation about future noncompliance.

KEY QUOTATIONS

"Thus, 'the Due Process Clause of the Fourteenth Amendment protects the fundamental right of parents to make decisions concerning the care, custody, and control of their children.'" (§ 57)

"We find that the trial court's condition that father develop 'a consistent pattern of healthy and meaningful supervised visits' with the child, sets a low threshold for reconsideration of father's parenting time, as he must simply prove his desire to be involved in the child's life." (§ 59)

FACTUAL BACKGROUND

Father and mother, who were never married, have a child born in November 2022. After mother was arrested following a traffic stop in which methamphetamine was found in her purse, the child was adjudicated dependent and placed in temporary custody arrangements under agency supervision. Father was later determined to be the biological father, but he did not complete his case-plan services, had limited contact with the agency, and exercised supervised visitation with the child only about five times in two years. The juvenile court awarded mother legal custody and ordered at least one supervised visit per month for father, with the possibility of increased visitation if father established a consistent pattern of healthy and meaningful visits.

PROCEDURAL HISTORY

The juvenile court adjudicated the child dependent, placed the child in various temporary custody arrangements under agency protective supervision, and ultimately conducted a June 2, 2025 trial on competing motions for

legal custody. On June 3, 2025, the court awarded legal custody to mother and ordered that father receive at least one supervised visit per month. Father appealed, challenging the visitation order as vague, insufficiently meaningful, and violative of due process.

DISPOSITION

affirmed

CASES CITED

- Anderson v. Anderson, 2002-Ohio-1156, ¶ 18 (7th Dist.)
- Jannetti v. Nichol, 2000 WL 652540, *3 (7th Dist. May 12, 2000)
- In re R.M., 2026-Ohio-1591, ¶ 89 (6th Dist.)
- In re A.D., 2017-Ohio-6913, ¶ 32 (6th Dist.)
- In re A.K., 2012-Ohio-4430, ¶ 25 (9th Dist.)
- In re T.A., 2024-Ohio-5139, ¶ 46 (6th Dist.)
- Booth v. Booth, 44 Ohio St.3d 142, 144 (1989)
- Blakemore v. Blakemore, 5 Ohio St.3d 217, 219 (1983)
- Troxel v. Granville, 530 U.S. 57, 65-66 (2000)
- Washington v. Glucksberg, 521 U.S. 702, 719-720 (1997)
- Harrold v. Collier, 2005-Ohio-5334, ¶¶ 39, 44
- Chavez v. Martinez, 538 U.S. 760, 775 (2003)
- Meyer v. Nebraska, 262 U.S. 390, 399, 401 (1923)
- Pierce v. Society of Sisters, 268 U.S. 510, 534-535 (1925)
- Prince v. Massachusetts, 321 U.S. 158, 166 (1944)
- Santosky v. Kramer, 455 U.S. 745, 753 (1982)