

SUPREME COURT OF OKLAHOMA

Daniels v. State

243 P.3d 21 (Okla. 2010) · Decided November 16, 2010

SUMMARY

The Oklahoma Supreme Court reviewed the termination of JoAnna Daniels’s parental rights to her minor daughter based on drug use and failure to complete court-ordered services. The court held that clear and convincing evidence supported the finding that termination was in the child’s best interests and affirmed the trial court’s judgment, vacating the Court of Civil Appeals’ opinion.

CASE DETAILS

COURT	Supreme Court of Oklahoma
WRITING FOR THE COURT	Winchester, J.; Edmondson, C.J.; Taylor, V.C.J.; Hargrave, J.; Kauger, J.; Watt, J.; Reif, J.
JURISDICTION	Oklahoma
DECIDED	November 16, 2010
DISPOSITION	vacated
PROCEDURAL POSTURE	Mother appealed a jury verdict and trial-court judgment terminating her parental rights. Division IV of the Oklahoma Court of Civil Appeals reversed, and the Oklahoma Supreme Court granted certiorari.
STANDARD OF REVIEW	The Supreme Court canvasses the record to determine whether clear and convincing evidence supports the trial court's termination decision and whether a factfinder could reasonably form a firm belief or conviction that the termination grounds were proven. The appellate court does not reweigh the evidence.
PRECEDENTIAL VALUE	Published Oklahoma Supreme Court opinion; precedential.
PARTIES	JoAnna Daniels v. State

TOPICS

- termination of parental rights
- parental rights
- family law procedure
- standard of review
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the State presented clear and convincing evidence that termination of Mother's parental rights was in the child's best interests.
2. Whether the evidence established that Mother failed to correct the conditions that led to the child's deprived adjudication.

HOLDINGS

1. The State presented sufficient clear and convincing evidence to support termination of Mother's parental rights, including evidence of Mother's drug problem, repeated failed or refused drug tests, failure to complete required treatment and counseling, and refusal to acknowledge the problem or obtain court-ordered help.

KEY QUOTATIONS

"We must canvass the record to determine whether the evidence is such that a factfinder could reasonably form a firm belief or conviction that the grounds for termination were proven." (24)

"Our appellate review does not require a re-weighing of the evidence presented at trial." (24)

"The verdict of the jury and the trial court's subsequent judgment are affirmed. OPINION OF THE COURT OF CIVIL APPEALS VACATED AND THE RULING OF THE TRIAL COURT AFFIRMED." (25)

FACTUAL BACKGROUND

DHS and police found nine-month-old C.D.P.F. in a home while investigating suspected drug use. The child's mother, JoAnna Daniels, returned later and was arrested after methamphetamine was found in the car she was driving and in her purse; she also failed a drug test. After the child was adjudicated deprived, Mother was ordered to complete substance-abuse treatment, refrain from drug use, submit to random testing, and complete domestic-violence counseling. She failed additional drug tests, refused several others, declined inpatient treatment, and did not complete all court-ordered services.

PROCEDURAL HISTORY

The State petitioned to adjudicate C.D.P.F. as a deprived child, and the trial court imposed conditions for the child's return. After Mother failed drug tests, refused additional testing, and did not complete required treatment and counseling, the State petitioned to terminate her parental rights. A jury recommended termination, and the trial court entered judgment accordingly. The Court of Civil Appeals reversed, but the Oklahoma Supreme Court vacated that opinion and affirmed the trial court.

DISPOSITION

vacated

CASES CITED

- In the Matter of C.G., 1981 OK 131, 637 P.2d 66
- In the Matter of the Adoption of L.D.S., 2006 OK 80, 155 P.3d 1
- In the Matter of S.B.C., 2002 OK 83, 64 P.3d 1080
- In re C.G., 1981 OK 131, 637 P.2d 66

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