

TEXAS COURT OF APPEALS, 4TH DISTRICT (SAN ANTONIO)

In the Interest of J.A.B., S.M.E., C.C.E., and M.B.E., Children

No. 04-25-00409-CV · No. 04-25-00409-CV · Decided December 17, 2025

SUMMARY

The Fourth Court of Appeals of San Antonio affirmed an order terminating the parental rights of Mother and Father C.J.E. Father challenged the sufficiency of the evidence supporting the statutory endangerment ground, and both parents challenged the best-interest findings. The court held that the evidence was legally and factually sufficient, including evidence of domestic violence, child abuse, substance abuse, instability, and the children’s placements.

CASE DETAILS

COURT	Texas Court of Appeals, 4th District (San Antonio)
WRITING FOR THE COURT	Irene Rios; Adrian A. Spears II; Velia J. Meza
JURISDICTION	Fourth Court of Appeals, San Antonio, Texas
DECIDED	December 17, 2025
DOCKET	04-25-00409-CV
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from order terminating parental rights
STANDARD OF REVIEW	Legal and factual sufficiency reviewed under clear and convincing evidence standard
PRECEDENTIAL VALUE	published
PARTIES	Mother, Father C.J.E. v. the State of Texas

TOPICS

- termination of parental rights
- child custody
- domestic violence
- standard of review
- evidence

PRACTICE AREAS

- family law

QUESTIONS PRESENTED

1. Whether the evidence is legally and factually sufficient to support the trial court's finding under statutory ground (E) that Father engaged in conduct endangering the physical or emotional well-being of his children
2. Whether the evidence is legally and factually sufficient to support the finding that termination of Father's parental rights is in the children's best interests
3. Whether the evidence is legally and factually sufficient to support the finding that termination of Mother's parental rights is in the children's best interests

HOLDINGS

1. The evidence is legally and factually sufficient to support the trial court's subsection (E) finding. Father's history of domestic violence against Mother and the children, combined with his long history of methamphetamine abuse, established an endangering course of conduct.
2. The evidence is legally and factually sufficient to support the trial court's best-interest finding as to Father.
3. The evidence is legally and factually sufficient to support the trial court's best-interest finding as to Mother.

KEY QUOTATIONS

"In reviewing the legal sufficiency of the evidence to support the termination of parental rights, we must 'look at all the evidence in the light most favorable to the finding to determine whether a reasonable trier of fact could have formed a firm belief or conviction that its finding was true.'" (p. 2)

"[W]hen a trial court makes a finding to terminate parental rights under section 161.001(b)(1)(D) or (E) and the parent challenges that finding on appeal, due process requires the appellate court to review that finding and detail its analysis.'" (p. 4)

"The children deserve a loving home where they can be taken care of and where their needs can be met. They don't have to worry about if they're going to have a house to live in for the next day or two or if they're going to have food in their home.'" (p. 27)

FACTUAL BACKGROUND

The case arose from a Department investigation after Father physically abused J.A.B., giving him a black eye by punching/slapping him and covering his mouth to prevent screaming. Father had a long history of domestic violence against Mother and the children, and a history of substance abuse including methamphetamine use. Both parents had unstable housing and employment. Mother had limited contact with the children and failed to complete most of her service plan requirements.

PROCEDURAL HISTORY

The Department filed a petition seeking termination of Father's and Mother's parental rights. After a bench trial, the trial court terminated both parents' parental rights based on multiple statutory grounds and a best-interest finding. Parents appeal, challenging the sufficiency of the evidence.

DISPOSITION

affirmed

CASES CITED

- In re H.R.M., 209 S.W.3d 105 (Tex. 2006)
- In re J.P.B., 180 S.W.3d 570 (Tex. 2005)
- In re J.F.C., 96 S.W.3d 256 (Tex. 2002)
- In re J.F.-G., 627 S.W.3d 304 (Tex. 2021)
- In re R.R.A., 687 S.W.3d 269 (Tex. 2024)
- In re N.G., 577 S.W.3d 230 (Tex. 2019)
- In re C.W., 586 S.W.3d 405 (Tex. 2019)
- Tex. Dep't of Hum. Servs. v. Boyd, 727 S.W.2d 531 (Tex. 1987)
- In re M.E.-M.N., 342 S.W.3d 254 (Tex. App.—Fort Worth 2011, pet. denied)
- In re J.T.G., 121 S.W.3d 117 (Tex. App.—Fort Worth 2003, no pet.)
- In re R.S.-T., 522 S.W.3d 92 (Tex. App.—San Antonio 2017, no pet.)
- In re J.O.A., 283 S.W.3d 336 (Tex. 2009)
- In re A.B.R., No. 04-19-00631-CV, 2020 WL 1159043 (Tex. App.—San Antonio Mar. 11, 2020, pet. denied)
- In re A.R.P., No. 04-23-00668-CV, 2024 WL 251957 (Tex. App.—San Antonio Jan. 24, 2024, no pet.)
- In re G.V.S., No. 04-18-00563-CV, 2018 WL 6624398 (Tex. App.—San Antonio Dec. 19, 2018, pet. denied)
- In re D.J.R., No. 04-23-00568-CV, 2023 WL 8246666 (Tex. App.—San Antonio Nov. 29, 2023, no pet.)
- In re A.V., 113 S.W.3d 355 (Tex. 2003)
- In re D.F.S., No. 04-20-00441-CV, 2021 WL 603364 (Tex. App.—San Antonio Feb. 17, 2021, pet. denied)
- In re A.A.M., 464 S.W.3d 421 (Tex. App.—Houston [1st Dist.] 2015, no pet.)
- In re E.A.M.V., No. 04-18-00866-CV, 2019 WL 1923214 (Tex. App.—San Antonio May 1, 2019, pet. denied)
- In re A.L.S., 660 S.W.3d 257 (Tex. App.—San Antonio 2022, pet. denied)
- In re R.R., 209 S.W.3d 112 (Tex. 2006)
- Holley v. Adams, 544 S.W.2d 367 (Tex. 1976)
- In re C.H., 89 S.W.3d 17 (Tex. 2002)
- Dupree v. Tex. Dep't of Protective & Regul. Servs., 907 S.W.2d 81 (Tex. App.—Dallas 1995, no writ)
- In re E.D., 419 S.W.3d 615 (Tex. App.—San Antonio 2013, pet. denied)
- Coburn v. Moreland, 433 S.W.3d 809 (Tex. App.—Austin 2014, no pet.)
- In re J.L.B., No. 04-17-00364-CV, 2017 WL 4942855 (Tex. App.—San Antonio Nov. 1, 2017, pet. denied)
- In re M.T.C., No. 04-16-00548-CV, 2017 WL 603634 (Tex. App.—San Antonio Feb. 15, 2017, no pet.)
- In re A.B., 437 S.W.3d 498 (Tex. 2014)
- In re J.J.O., No. 04-18-00425-CV, 2018 WL 5621881 (Tex. App.—San Antonio Oct. 31, 2018, no pet.)
- In re R.M.H., No. 04-23-00765-CV, 2023 WL 8103188 (Tex. App.—San Antonio Nov. 22, 2023, no pet.)

- In re N.L.R., No. 04-23-01020-CV, 2024 WL 1184462 (Tex. App.—San Antonio Mar. 20, 2024, no pet.)
- In re J.S.R., No. 04-21-00517-CV, 2022 WL 1559107 (Tex. App.—San Antonio May 18, 2022, pet. denied)
- In re A.N., No. 04-19-00584-CV, 2020 WL 354773 (Tex. App.—San Antonio Jan. 22, 2020, no pet.)
- In re J.M.T., 519 S.W.3d 258 (Tex. App.—Houston [1st Dist.] 2017, pet. denied)
- In re K.M., No. 04-08-00037-CV, 2008 WL 2923655 (Tex. App.—San Antonio July 30, 2008, pet. denied)
- In re A.M.L., No. 04-19-00422-CV, 2019 WL 6719028 (Tex. App.—San Antonio Dec. 11, 2019, pet. denied)
- In re E.C.R., 402 S.W.3d 239 (Tex. 2013)

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