

OREGON COURT OF APPEALS

State v. T. L.

350 Or. App. 212 (2026) · No. A184520 · Decided June 3, 2026

SUMMARY

The Oregon Court of Appeals affirmed an involuntary commitment judgment under the expanded criteria for persons with chronic mental illness. The court held that prior commitments under the expanded criteria may qualify as prior hospitalizations for purposes of former ORS 426.005(1)(f)(C) (ii). The court also held that the evidence was sufficient to establish substantially similar symptoms and a reasonable medical probability of deterioration without treatment.

CASE DETAILS

COURT	Oregon Court of Appeals
WRITING FOR THE COURT	Ortega, Presiding Judge; Lagesen, Chief Judge; Hellman, Judge
JURISDICTION	Oregon Court of Appeals
DECIDED	June 3, 2026
DOCKET	A184520
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a judgment involuntarily committing appellant for 180 days as a person with mental illness under the expanded chronic-mental-illness criteria in former ORS 426.005(1)(f)(C) (2023).
STANDARD OF REVIEW	Unless the court exercises its discretion to review de novo, it views the record in the light most favorable to the trial court's determination and reviews whether the evidence, including permissible derivative inferences, was legally sufficient to permit a rational factfinder to reach the same outcome. De novo review is exercised only in exceptional cases; neither party requested it here.
PRECEDENTIAL VALUE	Published and precedential Oregon Court of Appeals opinion.
PARTIES	T. L. v. State of Oregon

TOPICS

- statutory interpretation
- health law
- appellate procedure
- standard of review

PRACTICE AREAS

mental health law

health law

appellate procedure

statutory interpretation

QUESTIONS PRESENTED

1. Whether prior hospitalizations resulting from commitments under the expanded chronic-mental-illness criteria may satisfy the requirement in former ORS 426.005(1)(f)(C)(ii) that the person was twice placed in a hospital or approved inpatient facility within the previous three years.
2. Whether the evidence was legally sufficient to establish that appellant was exhibiting symptoms or behavior substantially similar to those preceding and leading to prior commitments under former ORS 426.005(1)(f)(C)(iii).
3. Whether the evidence was legally sufficient to establish that, without treatment, appellant would continue, to a reasonable medical probability, to deteriorate until becoming dangerous to himself or others or unable to meet his basic needs under former ORS 426.005(1)(f)(C)(iv).

HOLDINGS

1. Hospitalizations resulting from prior commitments under the expanded criteria of former ORS 426.005(1)(f)(C) may satisfy the requirement in former ORS 426.005(1)(f)(C)(ii) that the person was twice placed in a hospital or approved inpatient facility within the previous three years.
2. The evidence was legally sufficient to permit a rational factfinder to find by clear and convincing evidence that appellant exhibited symptoms substantially similar to those preceding his prior commitments and would, without treatment, deteriorate to become dangerous to himself or others or unable to meet his basic needs.

KEY QUOTATIONS

“Because the language of the statute is plain, we conclude that previous commitments under the expanded criteria may meet the requirements of former ORS 426.005(1)(f)(C)(ii).” (350 Or. App. at 216)

FACTUAL BACKGROUND

Appellant, a sixty-six-year-old veteran with schizoaffective disorder, drove to a police station, appeared confused and agitated, approached a behavioral-health specialist in a threatening posture, clenched his fists, and stated, “I’ll kill you all.” He was hospitalized and had also been committed in December 2022, May 2023, and February 2024. Mental-health witnesses testified that his current disorganization, delusions, and agitation substantially resembled symptoms preceding his earlier commitments and that, without treatment, he would deteriorate to the point of becoming dangerous to others or unable to meet his basic needs.

PROCEDURAL HISTORY

The Clackamas County Circuit Court found by clear and convincing evidence that appellant satisfied the expanded criteria for involuntary commitment and entered a 180-day commitment judgment. Appellant argued on appeal that prior commitments under the expanded criteria could not count toward the statute’s requirement of

two prior hospitalizations and that the evidence did not establish the statutory similarity and deterioration requirements. The Oregon Court of Appeals rejected both arguments and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. E. D., 264 Or. App. 71, 73, 331 P.3d 1032 (2014)
- State v. Gaines, 346 Or. 160, 171-172, 206 P.3d 1042 (2009)
- State v. T. Z., 287 Or. App. 8, 9, 13-14, 401 P.3d 1265 (2017)
- State v. Belli, 120 Or. App. 94, 96-98, 852 P.2d 238 (1993)

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