

CALIFORNIA COURT OF APPEAL, FIRST APPELLATE DISTRICT, DIVISION
FOUR

The People v. Sebastian C.

Sebastian C. · No. A172531 · Decided April 15, 2026

SUMMARY

The California Court of Appeal, First Appellate District, Division Four, held that placement in a family member’s home, together with supervision and programming provided by a community-based agency, can qualify as a less restrictive program under Welfare and Institutions Code section 875, subdivision (f). The court nevertheless dismissed the appeal as moot because the appellant had subsequently been placed in a less restrictive program.

CASE DETAILS

COURT	California Court of Appeal, First Appellate District, Division Four
WRITING FOR THE COURT	Goldman, J.; Brown, P. J.; Sweet, J.
JURISDICTION	California Court of Appeal, First Appellate District, Division Four
DECIDED	April 15, 2026
DOCKET	A172531
DISPOSITION	dismissed
PROCEDURAL POSTURE	Appeal from the Solano County Superior Court's denial of Sebastian C.'s request under Welfare and Institutions Code section 875, subdivision (f), to transfer from a secure youth treatment facility to a less restrictive program involving placement in his adult sister's home.
STANDARD OF REVIEW	Questions of statutory interpretation are reviewed independently. Mootness and whether to exercise discretion to decide an otherwise moot issue are governed by whether effective relief remains available and whether the issue presents a matter of broad public interest likely to recur.
PRECEDENTIAL VALUE	Published and certified for publication; precedential California Court of Appeal opinion.
PARTIES	Sebastian C. v. The People

TOPICS

statutory interpretation

mootness

appellate procedure

plain meaning rule

PRACTICE AREAS

Juvenile law

Juvenile justice

Statutory interpretation

Appellate procedure

Mootness

QUESTIONS PRESENTED

1. Whether a less restrictive program under Welfare and Institutions Code section 875, subdivision (f), may include placement in a relative's home when supervision and programming are provided or coordinated by a community-based agency.
2. Whether the appeal should be dismissed as moot after Sebastian was subsequently placed in other less restrictive programs.
3. Whether the juvenile court abused its discretion in denying the requested placement with Sebastian's sister.

HOLDINGS

1. Placement in a family member's home may satisfy section 875, subdivision (f), when the ward receives supervision and programming from a community-based agency. In that circumstance, the less restrictive program is the community residential or nonresidential service program providing or coordinating the services, not merely the family home.
2. The appeal was moot because reversal of the order denying placement with Sebastian's sister would provide no effective relief after Sebastian had subsequently been placed in less restrictive programs, including placement in his mother's home.
3. The court did not decide whether the juvenile court abused its discretion because the placement order was moot.

KEY QUOTATIONS

“Subdivision (f)(1)(B) describes the programming and services the court should consider in deciding whether to approve the transfer request, but it does not purport to define “less restrictive program.”” (9-10)

“Thus, consistently with the statute, a ward could receive programming or services from a community nonresidential service program while being housed in a relative’s home.” (10)

“In such circumstances, the less restrictive program is the “community . . . nonresidential service program,” not just the family home.” (11-12)

“For a ward whose progress warrants it, such a less restrictive program is not an improper effort to jump to the discharge phase of the case but something the statute appears to contemplate in appropriate circumstances.” (13)

FACTUAL BACKGROUND

At age 14, Sebastian C. was committed to a secure youth treatment facility for a four-year baseline term after admitting voluntary manslaughter and personal use of a firearm. After his baseline term was reduced by nine and one-half months, the probation department requested placement in a supervised independent living placement at his adult sister's home, accompanied by intensive probation supervision and community-based services. The juvenile court denied the request, concluding that the sister's home was not itself a less restrictive program. While the appeal was pending, Sebastian was placed first in an approved less restrictive program and later in his mother's home as part of a less restrictive program.

PROCEDURAL HISTORY

Sebastian C. was committed to a secure youth treatment facility for a baseline term after admitting voluntary manslaughter and personal firearm use. The probation department later sought his transfer to a supervised independent living placement in his adult sister's home, but the juvenile court denied the request on the ground that the home was not a less restrictive program under section 875. During the appeal, Sebastian was placed in other less restrictive programs, including his mother's home, rendering the requested placement order moot. The Court of Appeal nevertheless addressed the statutory-interpretation issue because it presented a matter of broad public interest, then dismissed the appeal as moot.

DISPOSITION

dismissed

CASES CITED

- People v. Alsafar (2017) 8 Cal.App.5th 880, 883
- In re David B. (2017) 12 Cal.App.5th 633, 644
- People v. Sebastian C. (In re Sebastian C.) (Dec. 5, 2023, A167599) [nonpub. opn.]
- In re Miguel C. (2021) 69 Cal.App.5th 899, 907