

COURT OF APPEALS OF OHIO, FOURTH APPELLATE DISTRICT,
PICKAWAY COUNTY

In re T.L.

2025-Ohio-5592 · No. 25CA24 · Decided December 10, 2025

SUMMARY

The Ohio Fourth District Court of Appeals affirmed a judgment granting Pickaway County Job and Family Services permanent custody of T.L. The court held that the mother's stipulation to permanent custody was knowingly, voluntarily, and intelligently made under the totality of the circumstances, and that she failed to demonstrate prejudice from any omission in the trial court's Juv.R. 29(D) colloquy.

CASE DETAILS

COURT	Court of Appeals of Ohio, Fourth Appellate District, Pickaway County
WRITING FOR THE COURT	Michael D. Hess; Smith, P.J.; Wilkin, J.
JURISDICTION	Ohio Court of Appeals, Fourth Appellate District, Pickaway County
DECIDED	December 10, 2025
DOCKET	25CA24
DISPOSITION	affirmed
PROCEDURAL POSTURE	Mother appealed a juvenile court judgment terminating her parental rights and granting permanent custody of T.L. to Pickaway County Job and Family Services after she stipulated to permanent custody.
STANDARD OF REVIEW	Because Mother did not object to the colloquy, the court applied plain-error review. Under Juv.R. 29(D), substantial compliance is assessed under the totality of the circumstances, and an admission is deemed voluntary absent prejudice or circumstances showing that the waiver was invalid.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Mother v. Pickaway County Job and Family Services

TOPICS

- termination of parental rights
- parental rights
- family law procedure
- appellate procedure
- due process

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the juvenile court violated Mother's due process rights by accepting her stipulation to permanent custody without determining that it was entered knowingly, voluntarily, and intelligently as required by Juv.R. 29(D).
2. Whether any omission in the juvenile court's colloquy concerning Juv.R. 29(D)(2) constituted plain error requiring reversal when the permanent-custody judgment was based on evidence beyond Mother's stipulation.

HOLDINGS

1. The juvenile court substantially complied with Juv.R. 29(D) because the totality of the circumstances showed that Mother understood she was consenting to an order terminating her parental rights and granting permanent custody to the Agency, and that her stipulation was knowing, voluntary, and intelligent.
2. Even assuming the omission of Juv.R. 29(D)(2) invalidated Mother's admission, reversal was unwarranted because Mother failed to demonstrate prejudice.

KEY QUOTATIONS

“The preferred practice is strict compliance with Juv.R. 29(D). However, if the trial court substantially complies with Juv.R. 29(D) in accepting an admission, the admission will be deemed voluntary absent a showing of prejudice or a showing that the totality of the circumstances does not support a finding of a valid waiver.” (¶ 13)

“The trial court did not solely rely on her admission when it terminated her parental rights and awarded the Agency permanent custody.” (¶ 15)

FACTUAL BACKGROUND

The Agency sought permanent custody of T.L. after prior dependency proceedings and failed reunification efforts involving the parents' drug addictions, Mother's serious health issues, and the parents' lack of housing and employment. Before the permanent-custody hearing, Mother signed a written stipulation acknowledging that the order would permanently sever and terminate her parental rights and that she would no longer be considered T.L.'s legal mother. At the hearing, Mother testified under oath, confirmed her understanding, and denied coercion, threats, promises, or being rushed. The juvenile court also heard testimony from Agency caseworkers and the guardian ad litem before finding by clear and convincing evidence that permanent custody was in T.L.'s best interest.

PROCEDURAL HISTORY

The Agency filed a dependency, abuse, and neglect complaint in February 2023, and the juvenile court adjudicated T.L. dependent and awarded the Agency temporary custody. In February 2025, the Agency moved for permanent custody. After Mother filed a written stipulation and affirmed it during the permanent-custody

hearing, the juvenile court held an evidentiary hearing, terminated Mother's parental rights, and granted the Agency permanent custody. The court of appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- In re E.A.G., 2024-Ohio-315, ¶ 81 (4th Dist.)
- In the Matter of G.R.S., 2019-Ohio-396, ¶ 6 (4th Dist.)
- In re Hayes, 79 Ohio St. 3d 46, 48 (1997)
- Matter of C.B., 2020-Ohio-5151, ¶ 12 (4th Dist.)
- Elmer v. Lucas Cty. Children Servs. Bd., 36 Ohio App. 3d 241, 245 (6th Dist. 1987)
- In re C.S., 2007-Ohio-4919, ¶ 113
- In the Matter of N.D., 2002-Ohio-3791, ¶¶ 18, 25 (8th Dist.)
- In the Matter of H.G., M.B., Z.W., and L.W., 2024-Ohio-2122, ¶¶ 19-23 (4th Dist.)