

MONTANA SUPREME COURT

In re C.C.

384 Mont. 135 (2016) · Decided July 19, 2016

SUMMARY

The Montana Supreme Court reviewed an involuntary commitment order for C.C. and held that the district court failed to provide the detailed factual findings required by Montana law. The court declined to apply implied findings to cure the deficient, pre-prepared order, vacated the commitment order, and remanded for dismissal. The court did not reach the separate issue concerning involuntary medication.

CASE DETAILS

COURT	Montana Supreme Court
WRITING FOR THE COURT	Justice Cotter; Justice Baker; Justice Wheat; Justice Shea; Justice Rice
JURISDICTION	Montana
DECIDED	July 19, 2016
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	C.C. appealed an order of involuntary commitment entered by the Nineteenth Judicial District Court, arguing that the order lacked the detailed factual findings required by Montana law and improperly authorized involuntary medication.
STANDARD OF REVIEW	Whether a district court's findings of fact meet the statutory requirements is a question of law reviewed for correctness.
PRECEDENTIAL VALUE	Published Montana Supreme Court opinion; precedential.
PARTIES	C.C. v. State of Montana

TOPICS

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

PRACTICE AREAS

- mental health law
- appellate procedure
- statutory interpretation

QUESTIONS PRESENTED

1. Whether the District Court erred by failing to provide a detailed statement of facts supporting C.C.'s involuntary commitment as required by § 53-21-127(8)(a), MCA.
2. Whether the District Court erred by including an involuntary-medication provision in the written judgment when that provision was not made in the oral pronouncement, was not statutorily compliant, and was unsupported by findings.

HOLDINGS

1. The District Court's pre-prepared commitment order, which contained only conclusory statutory findings and no detailed facts specific to C.C., failed to strictly comply with § 53-21-127(8)(a), MCA.
2. The Court declined to address the challenge to the involuntary-medication provision because vacatur of the commitment order made resolution of that issue unnecessary.

KEY QUOTATIONS

“We decline to expand the doctrine of implied facts to the degree necessary to affirm a commitment order that is beyond “bare-bones” and “spartan.”” (384 Mont. at 141, ¶ 23)

“The pre-prepared order signed by the District Court wholly fails to satisfy statutory requirements.” (384 Mont. at 141, ¶ 23)

“We vacate the District Court’s Order of Commitment and its separate Findings of Fact, Conclusions of Law and Order of Commitment and reverse and remand for an order of dismissal.” (384 Mont. at 142, ¶ 26)

FACTUAL BACKGROUND

C.C. exhibited unusual and threatening behavior, including possessing a loaded shotgun, making frightening statements to a neighbor, and speaking about killing an unidentified man while being transported to detention. A mental health professional diagnosed her with unspecified schizophrenia spectrum disorder and recommended commitment for further observation, assessment, and possible treatment. Following the adjudicatory hearing, the District Court entered a largely pre-prepared order containing conclusory findings but no detailed facts specific to C.C.'s condition, symptoms, or actions.

PROCEDURAL HISTORY

The Lincoln County Attorney filed a petition seeking C.C.'s involuntary commitment. After an adjudicatory hearing, the District Court committed C.C. to Montana State Hospital for ninety days and authorized involuntary medication. C.C. moved to amend the written order to conform to the court's oral pronouncement, but the motion was denied. The Montana Supreme Court vacated the commitment order, reversed, and remanded for entry of an order of dismissal.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Vacate the District Court's Order of Commitment and its separate Findings of Fact, Conclusions of Law and Order of Commitment, and remand for entry of an order of dismissal. The Court declined to remand for a supplemental order containing detailed facts.

CASES CITED

- In re L.L.A., 2011 MT 285, ¶ 7, 362 Mont. 464, 267 P.3d 1
- In re Mental Health of E.P.B., 2007 MT 224, 339 Mont. 107, 168 P.3d 662
- In re Mental Health of O.R.B., 2008 MT 301, 345 Mont. 516, 191 P.3d 482
- In re Mental Health of S.C., 2000 MT 370, 303 Mont. 444, 15 P.3d 861
- In re S.M., 2014 MT 309, 377 Mont. 133, 339 P.3d 23
- In re the Mental Health of L.K.-S., 2011 MT 21, 359 Mont. 191, 247 P.3d 1100
- In re R.W.K., 2013 MT 54, 369 Mont. 193, 297 P.3d 318
- In re M.P.-L., 2015 MT 338, 381 Mont. 496, 362 P.3d 627
- In re S.G.R., 2016 MT 70, 383 Mont. 74, 368 P.3d 1180