

OHIO COURT OF APPEALS, FIRST APPELLATE DISTRICT, HAMILTON
COUNTY

In re A.J.

2025-Ohio-5616 · No. C-250544 · Decided December 17, 2025

SUMMARY

The Ohio First District Court of Appeals affirmed a juvenile court judgment terminating the mother’s parental rights and granting permanent custody of A.J. to the Hamilton County Department of Job and Family Services. The court held that the judgment was supported by the manifest weight of the evidence, citing the mother’s continuing substance-use issues, unstable housing, and inability to remedy the conditions leading to removal. The court also concluded that permanent custody was in A.J.’s best interest.

CASE DETAILS

COURT	Ohio Court of Appeals, First Appellate District, Hamilton County
WRITING FOR THE COURT	Nestor, Judge; Bock, Presiding Judge; Moore, Judge
JURISDICTION	Ohio First District Court of Appeals
DECIDED	December 17, 2025
DOCKET	C-250544
DISPOSITION	affirmed
PROCEDURAL POSTURE	Mother appealed the Hamilton County Juvenile Court's judgment terminating her parental rights and granting permanent custody of A.J. to the Hamilton County Department of Job and Family Services.
STANDARD OF REVIEW	For a judgment terminating parental rights under R.C. 2151.414, the appellate court applies a sufficiency-of-the-evidence and/or manifest-weight-of-the-evidence standard depending on the arguments raised. Under the manifest-weight standard, the court weighs the evidence and reasonable inferences, considers witness credibility, and determines whether the juvenile court clearly lost its way and created a manifest miscarriage of justice.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Mother v. Hamilton County Department of Job and Family Services, Guardian ad Litem

TOPICS

termination of parental rights

parental rights

family law procedure

standard of review

appellate procedure

PRACTICE AREAS

juvenile law

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appellate procedure

QUESTIONS PRESENTED

1. Whether the juvenile court's determination under R.C. 2151.414(E) that A.J. could not or should not be placed with either parent was against the manifest weight of the evidence.
2. Whether the juvenile court's determination under R.C. 2151.414(D)(1) that permanent custody with HCJFS was in A.J.'s best interest was against the manifest weight of the evidence.

HOLDINGS

1. The juvenile court's finding that A.J. could not or should not be placed with either parent was supported by the manifest weight of the evidence.
2. The juvenile court properly determined that permanent custody with HCJFS was in A.J.'s best interest.
3. The juvenile court did not clearly lose its way or create a manifest miscarriage of justice; the permanent-custody judgment was not against the manifest weight of the evidence.

KEY QUOTATIONS

“weigh the evidence and all reasonable inferences, consider the credibility of the witnesses, and determine whether in resolving conflicts in the evidence, the [juvenile] court clearly lost its way and created such a manifest miscarriage of justice that the judgment must be reversed and a new trial ordered.” (¶ 20)

“terminating a parent’s right to raise his or her own [child] is the family-law equivalent of the death penalty.” (¶ 52)

FACTUAL BACKGROUND

A.J. was born in March 2018 and had previously been removed from Mother's care because of Mother's substance abuse and overdose. HCJFS obtained emergency custody again in March 2023 after A.J.'s older brother overdosed and authorities raised concerns about Mother's substance abuse and the condition of the home. During the proceedings, Mother repeatedly tested positive for cocaine, methamphetamine, fentanyl, benzodiazepines, and other substances, sometimes appeared intoxicated during supervised visits, and failed to provide reliable evidence of meaningful treatment, stable housing, or stable income. Although Mother maintained a positive relationship with A.J., A.J. was bonded to her foster family, which was willing to adopt her.

PROCEDURAL HISTORY

A.J. was removed from Mother's care in March 2023 after an overdose involving A.J.'s older brother and concerns about Mother's substance abuse and home conditions. The magistrate adjudicated A.J. abused,

neglected, and dependent in May 2024 and granted HCJFS permanent custody after a dispositional trial. The juvenile court reviewed objections, committed A.J. to HCJFS's permanent custody in September 2025, and the Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- In re Z.C., 2023-Ohio-4703, ¶¶ 11, 13
- In re A.B., 2015-Ohio-3247, ¶ 16 (1st Dist.)
- Eastley v. Volkman, 2012-Ohio-2179, ¶ 12
- In re P/W Children, 2020-Ohio-3513, ¶¶ 28-29 (1st Dist.)
- In re R.B., 2019-Ohio-3469, ¶¶ 10-11 (1st Dist.)
- In re J.B., 2025-Ohio-2135, ¶ 39 (1st Dist.)
- In re Z.F., 2024-Ohio-1698, ¶ 41 (1st Dist.)
- In re S.H. and Y.H., 2025-Ohio-2338, ¶ 53 (1st Dist.)
- In re N, 2024-Ohio-1492, ¶ 17 (1st Dist.)
- In re A.S., 2025-Ohio-1724, ¶ 27 (1st Dist.)
- In re E.H., 2022-Ohio-4701, ¶ 24 (1st Dist.)
- In re P. & H., 2019-Ohio-3637, ¶¶ 10, 42 (1st Dist.)
- In re Y.F., 2024-Ohio-5604, ¶ 32 (8th Dist.)