

COURT OF APPEALS OF OREGON

State v. T. L.

346 Or. App. 414 (2026) · No. A185653 · Decided January 7, 2026

SUMMARY

The Oregon Court of Appeals reversed a civil commitment judgment because the citation did not provide adequate notice that the appellant was alleged to be unable to meet her basic personal needs. The court held that, under ORS 426.090 and due process requirements, the citation had to identify the theory of commitment, and the incorporated emergency-hold notice did not sufficiently identify a basic-needs theory. The court did not decide whether the statute requires the citation to state the reasons of the court, investigator, or emergency-hold doctor.

CASE DETAILS

COURT	Court of Appeals of Oregon
WRITING FOR THE COURT	Aoyagi, Presiding Judge; Egan, Judge; Pagán, Judge
JURISDICTION	Oregon Court of Appeals
DECIDED	January 7, 2026
DOCKET	A185653
DISPOSITION	reversed
PROCEDURAL POSTURE	Appeal from a civil-commitment judgment after the circuit court denied the appellant's motions to dismiss based on allegedly inadequate notice in the citation and committed her to the custody of the Oregon Health Authority for up to 180 days.
STANDARD OF REVIEW	Not expressly stated in the opinion; the court reviewed the legal sufficiency of the civil-commitment citation and the denial of the motions to dismiss.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	T. L. v. State of Oregon

TOPICS

- health law
- procedural due process
- statutory interpretation
- appellate procedure
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the citation satisfied ORS 426.090 and due process by stating the specific reasons T. L. was believed to be a person with mental illness.
2. Whether incorporation of the doctor's notice of mental illness adequately notified T. L. that the state would seek commitment under the theory that she was unable to provide for her basic personal needs.

HOLDINGS

1. A citation under ORS 426.090 must provide sufficient specific-reasons notice to reveal the theory of commitment, including whether the person is alleged to be dangerous to self, dangerous to others, or unable to meet basic personal needs.
2. The citation was insufficient because it failed to notify T. L. that she was believed to be unable to provide for her basic personal needs due to a mental disorder and could be committed on that basis.
3. The civil-commitment judgment could not stand because T. L. was committed solely on the basic-needs theory, which the citation did not adequately disclose.

KEY QUOTATIONS

“when the state seeks to deprive a person of their liberty through the civil commitment process, the Due Process Clause of the Fourteenth Amendment to the United States Constitution requires, among other things, that the state provide prehearing notice to the person ‘of the specific issues the person must meet.’” (419-420)

“a minimum requirement for adequate notice is that the citation “reveal a theory of commitment—whether appellant was a danger to herself, a danger to others, or unable to meet her basic needs”” (420-421)

“the citation did not adequately state the “specific reasons” that appellant was believed to be a person with mental illness, ORS 426.090, in that it failed to notify appellant that she was believed to be unable to provide for her basic personal needs due to a mental disorder and was subject to commitment on that basis.” (422)

FACTUAL BACKGROUND

T. L.'s sister became concerned that T. L. was not eating or drinking, and T. L. was taken to a hospital and placed on an emergency hold. The doctor's notice stated that T. L. had not been eating or drinking for three days, had been off psychiatric medication for a month, was experiencing mental decompensation, and was unable to care for herself. The citation incorporated that notice but characterized the doctor's concern as dangerousness to self or others; at the commitment hearing, the state presented no evidence or argument on dangerousness and proceeded solely under a theory that T. L. was unable to meet her basic personal needs.

PROCEDURAL HISTORY

After an emergency hold, an investigation, and a probable-cause determination, the Multnomah County Circuit Court issued and served a citation incorporating the doctor's notice of mental illness. The circuit court denied the appellant's motions to dismiss, conducted a commitment hearing focused on inability to meet basic personal

needs, and ordered civil commitment. The Court of Appeals reversed because the citation did not adequately notify the appellant that the basic-needs theory would be pursued.

DISPOSITION

reversed

CASES CITED

- State v. B. L. W., 335 Or. App. 639, 560 P.3d 766 (2024)
- State v. T. C., 327 Or. App. 558, 536 P.3d 591 (2023), rev. denied, 371 Or. 825 (2024)
- State v. V. L., 341 Or. App. 774, 778, 575 P.3d 215 (2025)
- State v. A. M. W., 340 Or. App. 473, 474, 572 P.3d 343 (2025)
- State v. P. D., 333 Or. App. 738, 742, 553 P.3d 1063 (2024)
- State v. B. B., 240 Or. App. 75, 82-83, 245 P.3d 697 (2010)
- State v. L. D., 310 Or. App. 347, 484 P.3d 1100 (2021)
- State v. J. D. S., 242 Or. App. 445, 263 P.3d 1017 (2011)