

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, WESTERN DIVISION

Coley v. Clinton

479 F. Supp. 1036 (E.D. Ark. 1979) · No. LR-C-78-198 · Decided November 9, 1979

SUMMARY

The United States District Court for the Eastern District of Arkansas considered constitutional challenges to Arkansas procedures governing the commitment and release of persons found incompetent to stand trial or not guilty by reason of insanity. The court abstained from deciding the facial constitutional claims without prejudice, concluding that Arkansas courts should first interpret the statutes. It denied class-wide relief concerning confinement conditions but ordered the State Hospital Director to file required reports for certain patients, including at least annual reports concerning the plaintiff found not guilty by reason of insanity.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Western Division
WRITING FOR THE COURT	Roy, District Judge
JURISDICTION	Arkansas
DECIDED	November 9, 1979
DOCKET	LR-C-78-198
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs brought a putative class action under 42 U.S.C. § 1983 seeking declaratory and injunctive relief concerning Arkansas criminal-commitment procedures, conditions of confinement, and reporting duties. The district court sua sponte abstained from deciding the facial and as-applied constitutional challenges to the commitment statutes, denied class relief, and granted limited injunctive relief requiring statutory reports for certain patients.
STANDARD OF REVIEW	The court applied abstention principles to the constitutional challenge, evaluated the challenged confinement classifications under due process and equal protection principles, and construed the Arkansas statutes governing hospital reporting and release.

PRECEDENTIAL VALUE	Published federal district court memorandum opinion; persuasive authority within the district and not binding on other courts.
PARTIES	Floyd F. Coley, Ralph Steed, All other persons similarly situated v. Bill Clinton, Gail S. Huecker, Robert M. Rankin, Pat Hamilton, A. C. Yopp, James S. Beckman, Larry Killough, Virginia Robinson, Darrell Williams, Blanche Choate

TOPICS

procedural due process equal protection section 1983 civil rights criminal procedure

PRACTICE AREAS

constitutional law civil rights criminal commitment mental health law federal courts

QUESTIONS PRESENTED

1. Whether the federal court should decide the facial and as-applied constitutional challenges to Arkansas criminal-commitment statutes before Arkansas courts had interpreted them.
2. Whether the segregation and differing treatment of patients committed under criminal statutes violated equal protection or imposed arbitrary restrictions on personal liberty.
3. Whether the Director of the Arkansas State Hospital had a statutory duty to file periodic reports concerning patients committed after being found incompetent to stand trial and patients acquitted by reason of insanity.
4. Whether plaintiffs were entitled to class-wide injunctive relief concerning reporting and release procedures.

HOLDINGS

1. The court abstained from deciding the constitutional challenges and dismissed the declaratory-relief claims without prejudice because the statutory provisions were unsettled, available state remedies existed, and the Arkansas courts had not yet interpreted the challenged provisions.
2. The challenged restraints and segregation did not violate equal protection or constitute impermissibly arbitrary restrictions because the differences were related to security, the nature of the commitments, and therapeutic treatment.
3. Under Ark. Stat. Ann. § 41-607, the Director had a duty to file a report for Steed because he had been committed under the Criminal Code for more than one year; the court ordered that the report be filed if it had not already been filed.
4. Although § 41-613 did not expressly require an annual report for Coley, a reasonable interpretation of the Arkansas statutory scheme required the Director to file a report at least once a year.
5. Class relief was denied because the differing lengths, statutory bases, and reasons for commitment created too many individual variations, making individualized examination necessary and preventing

satisfaction of the requirements of Federal Rule of Civil Procedure 23.

KEY QUOTATIONS

“The federal courts should not attempt to displace the state courts.” (479 F. Supp. at 1038)

“This court cannot predict the exact way in which the state court will interpret the statutes, but we assume it will be in a lawful and constitutional manner.” (479 F. Supp. at 1039)

FACTUAL BACKGROUND

Coley was committed to the Arkansas State Hospital after being found not guilty of aggravated robbery by reason of insanity. Steed was committed after being found incompetent to stand trial on a disorderly-conduct charge. Both were housed in Rogers Hall, where criminally committed patients were segregated from civilly committed patients and generally had fewer privileges; the hospital also used different wards and restrictions based on patient status and treatment progression. Hospital officials acknowledged that many patients committed under the criminal code had remained hospitalized for more than one year without reports being submitted to the committing courts.

PROCEDURAL HISTORY

Coley and Steed, patients committed to the Arkansas State Hospital under criminal-commitment statutes, challenged the constitutionality of the commitment and release procedures and alleged unequal and excessively restrictive treatment. The court declined to reach the statutory constitutional challenges because Arkansas courts had not interpreted the provisions and available state remedies could address the claims. After evaluating the hospital's treatment practices and statutory reporting obligations, the court denied class-wide relief, ordered a report concerning Steed, and required annual reporting for Coley under a reasonable interpretation of the statute.

DISPOSITION

other

CASES CITED

- Wessel v. Pryor, 461 F. Supp. 1144 (W.D. Ark. 1978)
- Moore v. Sims, ___ U.S. ___, 99 S. Ct. 2371, 60 L. Ed. 2d 994 (1979)
- Calvin Burks v. Joseph Teasdale, 603 F.2d 59 (8th Cir. 1979)
- Rizzo v. Goode, 423 U.S. 362, 96 S. Ct. 598, 46 L. Ed. 2d 561 (1976)
- Welsch v. Likins, 550 F.2d 1122 (8th Cir. 1977)
- George v. Parratt, 602 F.2d 818 (8th Cir. 1979)
- Bennett v. National Ass'n for Advancement of Colored People, 236 Ark. 750, 370 S.W.2d 79 (1963)
- Jackson v. Indiana, 406 U.S. 715, 92 S. Ct. 1845, 32 L. Ed. 2d 435 (1972)
- Baxstrom v. Herold, 383 U.S. 107, 86 S. Ct. 760, 15 L. Ed. 2d 620 (1966)
- Bolton v. Harris, 130 U.S. App. D.C. 1, 395 F.2d 642 (D.C. Cir. 1968)

- Campbell v. State, 265 Ark. 77, 576 S.W.2d 938 (1979)

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