

DISTRICT COURT OF APPEAL OF FLORIDA, THIRD DISTRICT

S.A., the Mother v. Department of Children and Families

No. 3D25-2407 (Fla. 3d DCA May 20, 2026) · No. 3D25-2407 · Decided May 20, 2026

SUMMARY

The Third District Court of Appeal of Florida affirmed the termination of S.A.’s parental rights. The court held that the trial evidence supported findings that S.A. had not substantially complied with her case plan and that termination was the least restrictive means of protecting the child, and it rejected her claims that she was denied participation and counsel at trial.

CASE DETAILS

COURT	District Court of Appeal of Florida, Third District
WRITING FOR THE COURT	SCALES, C.J.; LOGUE, J.; LOBREE, J.
JURISDICTION	Florida Third District Court of Appeal
DECIDED	May 20, 2026
DOCKET	3D25-2407
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an order of the Circuit Court for Miami-Dade County terminating the mother's parental rights.
PRECEDENTIAL VALUE	published
PARTIES	S.A., the Mother v. Department of Children and Families, Guardian ad Litem

TOPICS

- termination of parental rights
- parental rights
- evidence
- appellate procedure
- family law

PRACTICE AREAS

- family law
- termination of parental rights
- appellate procedure
- evidence

QUESTIONS PRESENTED

1. Whether competent evidence supported the trial court's findings that S.A. had not substantially complied with the case plan and that termination of her parental rights was the least restrictive means of protecting A.M.A. from harm.

2. Whether the record supported S.A.'s claims that she was deprived of the right to participate in the trial and was not represented by counsel at trial.

HOLDINGS

1. The evidence admitted at trial supported the trial court's findings that S.A. had not substantially complied with the case plan and that termination of her parental rights was the least restrictive means to protect A.M.A. from harm.
2. The record expressly contradicted S.A.'s claims that she was deprived of the right to participate in the trial and was not represented by counsel at trial.

FACTUAL BACKGROUND

At trial, the evidence supported findings that S.A. had not substantially complied with her case plan. The trial court also found that termination of S.A.'s parental rights was the least restrictive means of protecting A.M.A. from harm. The appellate record contradicted S.A.'s claims that she was deprived of participation in the trial and lacked counsel at trial.

PROCEDURAL HISTORY

The Circuit Court for Miami-Dade County found that S.A. had not substantially complied with her case plan and that termination of her parental rights was the least restrictive means of protecting A.M.A. from harm. S.A. appealed, arguing that she was deprived of the right to participate in the trial and was not represented by counsel. The Third District Court of Appeal affirmed.

DISPOSITION

affirmed

CASES CITED

- G.C. v. Dep't of Child. & Fams., 337 So. 3d 446, 448 (Fla. 3d DCA 2022)

OPINION

PER CURIAM.

Third District Court of Appeal State of Florida Opinion filed May 20, 2026. Not final until disposition of timely filed motion for rehearing. _____ No. 3D25-2407 Lower Tribunal No. 17-15662 TPB D001 _____ S.A., the Mother, Appellant, vs. Department of Children and Families, et al., Appellees. An Appeal from the Circuit Court for Miami-Dade County, Yery Marrero, Judge.

S. A., the Mother, in proper person. Karla Perkins, B.C.S., for appellee Department of Children & Families; Sara Elizabeth Goldfarb, Statewide Director of Appeals, and Laura J. Lee, Assistant Director of Appeals (Tallahassee), for appellee Guardian ad Litem.

Before SCALES, C.J., and LOGUE and LOBREE, JJ. PER CURIAM. The evidence admitted at trial supports the trial court's findings that S.A. has not substantially complied with the case plan and that termination of S.A.'s parental rights is the least restrictive means to protect A.M.A. from harm. Furthermore, the record expressly contradicts S.A.'s claims that she was deprived of the right to participate in the trial and was not represented by counsel at trial.

Accordingly, we affirm. See generally *G.C. v. Dep't of Child. & Fams.*, 337 So. 3d 446, 448 (Fla. 3d DCA 2022). Affirmed. 2