

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

- 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)