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SUPREME COURT OF TEXAS
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Cause No. 23-0067

In the Supreme Court of Texas

CHRISTINE LENORE STARY,

Petitioner,

v.

BRADY NEAL ETHRIDGE,

Respondent.

On Review from the First District Court of Appeals
Houston, Texas No. 01-21-00101-CV

Brief for the Family Freedom Project as Amicus Curiae

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INTEREST OF AMICUS CURIAE

Amicus Curiae is Family Freedom Project (FFP), a registered assumed name of the Texas Home School Coalition, which is a nonprofit organization committed to preserving the fundamental rights of parents to raise their children without unwarranted and unnecessary interference by the government or other nonparents.

FFP does extensive work in the courts and the Texas legislature to protect the constitutional rights of Texas parents to raise their children. FFP has been instrumental in the passage of numerous bills in the Texas legislature designed to ensure that the fundamental rights of Texas parents are protected against unlawful interference from Child Protective Services. Additionally, FFP routinely works on legislation that would protect the rights and responsibilities of parents to raise their children in the areas of family law, healthcare, education, and criminal law.

Similarly, FFP works to protect the rights of Texas parents from overreach in the courts. FFP regularly intervenes in cases dealing with complex questions of child welfare and parental rights. Many of these cases have been before this Court. FFP works to clarify jurisprudence on questions of parental rights so that the rights of parents are protected against unwarranted intrusion from the state and to ensure that families across Texas have equal access to justice through Texas courts regardless of their background or socioeconomic status.

FFP will continue advocating as a friend of the court in significant cases in which this Court is asked to explain, interpret, or protect the fundamental liberty interests of parents. This case, which presents an important question regarding the circumstances under which parental rights may be almost entirely eliminated by the state, is one of those cases.

No party's counsel authored this brief in whole or in part, and no party's counsel made a monetary contribution intended to fund the preparation or submission of this brief. No person other than Amicus Curiae or its counsel have made a monetary contribution to this brief's preparation or submission. Tex. R. App. P. 11.

STATEMENT OF FACTS

FFP adopts and incorporates by reference Petitioner's Statement of Facts for the purpose of this brief.

INTRODUCTION AND SUMMARY OF ARGUMENT

Courts do not need to choose between protecting children and protecting parents' constitutional rights. Using well-established jurisprudence, they can do both.

Parental rights law can be a subject of high conflict. An inherent tension exists between the constitutional rights of parents to raise their children without

government interference and the duty of the government to protect its most vulnerable citizens from harm.

Lawmakers and judges have grappled with finding the right balance for over a century. Over the decades, a finely balanced truce, however uneasy it may be, has been hammered out in near-countless legislative sessions and judicial opinions. Parents' constitutional rights have definable contours, as do the due process rights afforded to them.

The facts as found by the courts below are admittedly egregious. The matter may well have warranted a termination of parental rights lawsuit. FFP's interest in this case is in the process, not the parties, because the case at bar threatens to turn parental rights jurisprudence on its head. Using a procedure that effectively produces the same result as a termination of parental rights but that lacks the due process protections of a termination case, the courts below have ordered a *lifetime* ban on a relationship between mother and children. This act violates constitutional mandates and due process protections by failing to abide by strict scrutiny requirements and by using a lower standard of evidence than the constitution mandates. FFP agrees with the Heritage Defense Foundation's argument that this order shocks the conscience and urges this Court to right this wrong by striking down the lifetime ban.

The compelling interest of the state in protecting its most vulnerable citizens from harm may be achieved using the constitutionally mandated safeguards that apply to any other case concerning state intrusion into the private realm of the family. It is not necessary to abandon more than a century of constitutional jurisprudence safeguarding fundamental liberties in order to achieve that compelling interest. The proper and constitutionally mandated balance between the advancement of a compelling state interest and the protection of fundamental liberties deserves continued respected. Doing so provides the state latitude to protect children when necessary, while at the same time protecting its citizens from governmental overreach that tramples the fundamental liberties enshrined in our federal and state constitutions.

ARGUMENT

I. Parents' rights to the care, custody and control of their children are fundamental in nature, protected under the Fourteenth Amendment of the U. S. Constitution, Article I § 19 of the Texas Constitution, and Texas Supreme Court precedent.

Parental rights are, without question, one of the personal and fundamental rights protected by the Constitution. "This natural parental right has been characterized as 'essential,' 'a basic civil right of man,' and 'far more precious than property rights.'" *Holick v. Smith*, 685 S.W.2d 18, 20 (Tex. 1985) (quoting *Stanley v. Illinois*, 405 U.S. 645, 651 (1972)). "The history and culture of Western civilization reflect a strong tradition of parental concern for the nurture and

upbringing of their children. This primary role of the parents in the upbringing of their children is now established beyond debate as an enduring American tradition." *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972).

"The natural right which exists between parents and their children is one of constitutional dimensions." *Wiley v. Spratlan*, 543 S.W.2d 349, 352 (Tex. 1976) (collecting cases). "It is cardinal . . . that the custody, care and nurture of the child reside first in the parents . . . ." *Troxel v. Granville*, 530 U.S. 57, 65 (2000) (plurality opinion) (quoting *Prince v. Massachusetts*, 321 U.S. 158, 166 (1944)). "Parents enjoy a fundamental right to make decisions concerning 'the care, custody, and control of their children.'" *In re Chambless*, 257 S.W.3d 698, 700 (Tex. 2008) (quoting *Troxel*, 530 U.S. at 65).

The right of parents to raise their children free from government interference is a fundamental right protected by the Due Process Clause of the Fourteenth Amendment. *See* U.S. CONST. amend. XIV § 1; *Troxel*, 530 U.S. at 66. This right is recognized by both the U.S. and Texas Supreme Courts. *Troxel*, 530 U.S. at 66; *In re Chambless*, 257 S.W.3d at 700. The right of a fit parent to determine the care, custody, and control of his or her child is subject to the protections of the Due Process Clause of the Fourteenth Amendment. *Troxel*, 530 U.S. at 66. "The liberty interest at issue in this case—the interest of parents in the care, custody, and control of their children—is perhaps the oldest of the fundamental liberty interests

recognized by this Court." *Id*. at 65; *see also Pierce v. Soc'y of the Sisters of the Holy Names of Jesus & Mary*, 268 U.S. 510, 534–35 (1925); *Yoder*, 406 U.S. at 214; *Santosky v. Kramer*, 455 U.S. 745, 753 (1982).

The Texas Constitution provides parents due process rights to the care, custody, and control of their children:

> No citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disenfranchised, except by the due course of the law of the land.

TEX. CONST. art. I, § 19.

The Texas Supreme Court has made clear that these due process rights extend to parents:

> The United States Constitution and Texas Constitution provide parents due process rights as to the care, custody, and control of their children. The United States Constitution mandates that no state shall "deprive any person of life, liberty, or property, without due process of law." In Texas, "[n]o citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disfranchised, except by the due course of the law of the land." This Court has stated that there is no "meaningful distinction" between due process of the law under the United States Constitution and due course of law under the Texas Constitution. Texas courts have, therefore, traditionally followed federal due process precedent.
>
> . . . One of the most fundamental liberty interests recognized is the interest of parents in the care, custody, and control of their children.

In re N.G., 577 S.W.3d 230, 234–35 (Tex. 2019) (alteration in original) (citations omitted).

II. A lifetime protective order effectively terminates a parent's right to the care, custody and control of his or her child. It is effectively equivalent to, and in some ways worse than a parental rights termination order.

The trial court effectively terminated Petitioner's parental rights, depriving her of her fundamental liberty interest in the care, custody, and control of her children. The First Court of Appeals stated that "the scope of the rights affected by a protective order, even for an indefinite period of time, is more limited than the rights affected by a parental termination case." *Stary v. Ethridge*, No. 01-21-00101-CV, 2022 WL 17684334, at *6 (Tex. App.—Houston [1st Dist.] Dec. 15, 2022, pet. filed). Specifically, the Court stated that the protective order "only prohibits certain specific actions, including prohibiting Stary from . . . communicating with [the children] except through their attorney or counselor; . . . going near any location where they are known to be and their residence, child-care facilities, and schools; and possessing a firearm or ammunition." *Id*. In short, the First Court of Appeals affirmed that Petitioner is "only" deprived of her right to care for her children, to have custody of her children, or control them in any way.

Thus, the protective order *entirely eliminates* Petitioner's ability to enjoy her fundamental right to "make decisions concerning 'the care, custody, and control of [her] children.'" *In re Chambless*, 257 S.W.3d 698 at 700 (quoting *Troxel*, 530 U.S. at 65). The First Court of Appeals stated that the protective order is not as extensive as a termination order because Petitioner retains such rights as "to receive

information and records about the children's health, education, and welfare; to confer with [the father] *when possible* in making decisions about the children's health, education, and welfare; and to consent to medical, dental, and surgical procedures and educational decisions *subject to* [the father's] agreement." *Stary*, 2022 WL 17684334, at *6 (emphasis added). In other words, she may make recommendations—as doctors, teachers, welfare agency workers, friends, relatives, and strangers on the street may—and has the ability to receive the same information that is available to any number of government agencies. *See id.*

The First Court of Appeals went on to state that "the retention of some rights distinguishes the protective order in this case from an order in a parental termination case." *Id*. However, those "some rights" are not the core rights of care, custody, and control protected by the U.S. and Texas Constitutions. Those core, fundamental, and protected rights were eliminated by the protective order. There are no substantive differences in the effect on a parent's constitutionally protected rights between this lifetime protective order and a termination order.

Yet differences do exist, which in significant ways make the lifetime protective order *worse*. For example, the deprivation created by the protective order *may* (or may not), ultimately, be permanent and is subject to the discretion of a judge. Texas Family Code Section 85.025(b) allows for the *possibility* of vacating the

otherwise permanent ban. TEX. FAM. CODE ANN. § 85.025(b). A comparison of the two statutory procedures may be of benefit to the Court:

	Lifetime Protective Order[1]	Termination of Parental Rights[2]
Right to Jury	No[3]	Yes[4]
Right to Discovery	No	Yes[5]
Duration of Order	Lifetime	Ends at Adulthood
Evidence Standard	Preponderance of Evidence[6]	Clear and Convincing Evidence[7]
Proof Required	Finding of Felony Family Violence—No Criminal Indictment Required[8]	Ground + Best Interest[9]

1 *Id.* §§ 85.001–.065.

2 *Id.* §§ 262.001–.417.

3 *Id.* § 85.001.

4 *Id.* § 105.002(b); TEX. CONST. art. I, § 15.

5 TEX. FAM. CODE ANN. § 262.014; TEX. R. CIV. P. 190.3.

6 *Roper v. Jolliffe*, 493 S.W.3d 624, 634 (Tex. App.—Dallas 2015, pet. denied).

7 TEX. FAM. CODE ANN. § 161.001(b).

8 *Id.* § 85.025(a-1).

9 *Id.* § 161.001.

Service Plan Prior to Final Order	No	Yes[10]
Pre-Trial Permanency Hearing to Determine if Child Can Go Home	No	Yes[11]
Pre-Trial Monitored Return of Child	No	Yes[12]
Narrowly Tailored (Strict Scrutiny)	No	Yes

A lifetime protective order and a termination of parental rights order are not the same, as shown above. They are procedurally different, including the procedures in place to reverse them. However, the effect is the same:

Fundamental, constitutional parental rights are substantially burdened. A lifetime protective order creates this burden without the due process safeguards required, and without the level of proof required. Thus, it fails.

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10 *Id.* § 263.101–.102.

11 *Id.* § 263.306(a-1)(6)–(7).

12 *Id.* § 263.403.

III. A lifetime protective order that fails to abide by strict scrutiny requirements violates a parent's constitutional due process rights.

Any intervention by the state into the parent-child relationship is fraught with peril, for it is presumed that the interests of the child and the parent will normally align. *Santosky*, 455 U.S. at 753, 760 ("At the factfinding [stage], the State cannot presume that a child and his parents are adversaries."). Yet, it is sometimes necessary to protect children from significant harm at the hand of an abusive parent. A strict scrutiny analysis provides the method by which courts can effectively analyze the validity of any such intervention, and assures the proper balance between advancing a compelling interest and respecting fundamental liberties. Doing so provides the state the latitude it needs to protect children when necessary, while at the same time protecting citizens from governmental overreach that tramples the fundamental liberties enshrined in our federal and state constitutions.

Courts generally apply strict scrutiny if a state statute infringes upon a fundamental liberty interest protected under the Due Process Clause of the Fourteenth Amendment. *See Reno v. Flores*, 507 U.S. 292, 302 (1993). Longstanding jurisprudence from the U.S. Supreme Court holds that the proper standard of review when parental rights are at issue is strict scrutiny. *See id.*; *see also Troxel*, 530 U.S. at 80 (Thomas, J., concurring) (noting that strict scrutiny is the appropriate standard for reviewing the infringement of fundamental rights such as the parental right to direct a child's upbringing).

Application of this standard prevents any infringement of fundamental rights "unless the infringement is narrowly tailored to serve a compelling state interest." *Reno*, 507 U.S. at 301–02 (1993); *see also Washington v. Glucksberg*, 521 U.S. 702, 721 (1997) (noting that the Fourteenth Amendment of the U.S. Constitution forbids the government from infringing on fundamental liberty interests *at all*, *no matter what process is provided*, unless the infringement is narrowly tailored to serve a compelling state interest).

A law that is subject to strict scrutiny must be "narrowly tailored to serve a compelling state interest." *Reno*, 507 U.S. at 302. When a fundamental right is implicated, like the right of parents to raise their children, a statute will be upheld only if it is narrowly tailored to serve a compelling state interest. *In re Pensom*, 126 S.W.3d 251, 254 (Tex. App.—San Antonio 2003, orig. proceeding). "A statute is narrowly tailored if it targets and eliminates no more than the exact source of the 'evil' it seeks to remedy." *Frisby v. Schultz*, 487 U.S. 474, 485 (1988) (citation omitted). A complete ban can be narrowly tailored only if each activity within the proscription's scope is an appropriately targeted evil. *Id.*

The lifetime protective order is clearly not narrowly tailored. It is a *lifetime* ban and almost by definition not narrowly tailored to the need to protect *children*. Even a termination-of-parental-rights order does not follow the children into adulthood. But the lifetime protective order stays in effect regardless of the age or

circumstances of the children or Petitioner. What if the children are in their forties, Petitioner is languishing in hospice care days from death, and the children desire to see her? It does not matter. This meeting would violate the lifetime protective order. Texas Family Code Section 85.025(b) allows only the subject of the lifetime protective order the right to move to modify that order. TEX. FAM. CODE ANN. § 85.025(b). If the subject has used up her two strikes, the adult children in this example are out of luck. *See id.* § 85.025(b)–(b-1) (permitting the subject of a protective order to move for review of the order for a maximum of two times). Why? Because a protective order was never designed to last a lifetime.

However, no such action is required under a termination order—because the termination order is narrowly tailored to eliminate "no more than the exact source of the 'evil' it seeks to remedy." *Frisby*, 487 U.S. at 475. The lifetime protective order goes far beyond that, even for far less extreme scenarios.

May Petitioner and children meet under the SAFE program?[13] The lifetime protective order says no. A program designed to facilitate safe, closely supervised contact between a child and a parent who has committed abuse, is a drug or alcohol abuser, or even is a flight risk cannot be considered under this lifetime protective

[13] The SAFE program is a supervised visitation program for non-custodial parents. *Welcome to SAFE*, SAFE PROGRAM, www.thesafeprogram.org (last visited May 22, 2024).

order. Zero contact is allowed. This far exceeds the need for protection and thus fails to be narrowly tailored.

In many ways, this lifetime protective order not only equals a termination order but far exceeds it. As such, it is not narrowly tailored and thus fails constitutionally-required strict scrutiny.

The facts of the case at bar, as found,[14] are egregious. But this in no way gives a court leeway to suspend constitutional safeguards. It is the difficult cases where those safeguards are needed the most. The trial court failed to use them; thus the lifetime protective order must fail.

IV. A lifetime protective order violates a parent's due process rights by effectively terminating the parent-child relationship using a constitutionally deficient preponderance of the evidence standard.

Involuntary termination of parental rights must pass a two-pronged test. The trial court must find, by clear and convincing evidence, that the parent has engaged in one of the grounds set forth in the Texas Family Code and that termination is in the best interest of the child. *See* TEX. FAM. CODE ANN. § 161.001(b); *see also Leal v. Tex. Dep't of Protective & Regul. Servs.*, 25 S.W.3d 315, 318 (Tex. App.—Austin 2000, no pet.). The clear and convincing burden of proof "is defined as that measure or degree of proof which will produce in the mind of the trier of fact a firm belief or

[14] The record shows that no discovery was conducted, and hearing evidence was based in part on hearsay testimony.

conviction as to the truth of the allegations sought to be established." *State v. Addington*, 588 S.W.2d 569, 570 (Tex. 1979). The definition is also established in the Texas Family Code. *See* TEX. FAM. CODE ANN. § 101.007. The clear-and-convincing standard is required not only by statute, but also by the United States Constitution. "Before a State may sever completely and irrevocably the rights of parents in their natural child, due process requires that the State support its allegations by at least clear and convincing evidence." *Santosky*, 455 U.S. at 747–48.

However, the lifetime protective order was not issued under this standard. Under Texas Family Code Section 85.025, the burden of proof for a protective order is preponderance of the evidence, which is significantly less than clear and convincing evidence. *Roper v. Jolliffe*, 493 S.W.3d 624, 638 (Tex. App.—Dallas 2015, pet. denied). Such a standard is sufficient for a protective order of limited duration. However, for a lifetime protective order, which in effect is equal to or worse than a parental rights termination order, it is wholly improper. When, as here, a protective order permanently deprives a parent of the constitutional right to the care, custody and control of a child, the heightened clear-and-convincing standard is mandated.

True, not *all* of Petitioner's rights are completely and irrevocably severed, but the important, constitutionally-protected rights to care, custody and control *are*.

Compare Santosky, 455 U.S. at 747–48 (analyzing complete and irrevocable severance of rights), *with Stary*, 2022 WL 17684334, at *6 (listing limited rights left unsevered). The *Santosky* court stated:

> This Court has mandated an intermediate standard of proof—"clear and convincing evidence"—when the individual interests at stake in a state proceeding are both "particularly important" and "more substantial than mere loss of money." Notwithstanding "the state's 'civil labels and good intentions,'" the Court has deemed this level of certainty necessary to preserve fundamental fairness in a variety of government-initiated proceedings that threaten the individual involved with "a significant deprivation of liberty" or "stigma."

455 U.S. at 756 (citations omitted). The infringement or loss of parental rights threatens "a significant deprivation of liberty" certainly "more substantial than mere loss of money." *Id.* (quoting *Addington v. Texas*, 441 U.S. 418, 424, 425 (1979)). The loss of the care, custody, and control of a child is a greater one than deportation or denaturalization. *Cf. id.* (identifying deportation and denaturalization as rights that threaten significant deprivations of liberty). The stigma, too, is similar to or greater than the other deprivations for which the Supreme Court has required clear and convincing evidence. Such a deprivation rightly demands a clear-and-convincing standard, especially in a lifetime protective order.

The wholly deficient standard of evidence used by the trial court in this case, along with the lack of discovery and other missing due process protections required for a parental rights termination case, makes it clear that the lifetime protective order does not pass constitutional muster. It must not stand.

CONCLUSION

For the reasons discussed above, the lifetime protective order against Petitioner does not pass constitutional muster. It must, therefore, be struck down. The Family Freedom Project respectfully requests that this Court, using an explicit strict scrutiny analysis, vacate the lifetime protective order issued by the trial court.

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this document complies with TEX. R. APP. P. 9. It contains 3,667 words, as determined by the computer software's word count function, excluding the sections of the brief exempted by TEX. R. APP. P. 9.4(i)(1) and is proportionally spaced using Times New Roman, 14 point.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was delivered to each party and/or their respective attorney of record on or before May 22, 2024 via electronic service in accordance with TEX. R. APP. P. 9.5.

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