

Addington v. Texas (1979)

Nature: Standard of proof in civil commitment proceedings

Facts and Procedure: Frank Addington had a lengthy history of mental illness and had been committed to various Texas state hospitals on 10 occasions between 1969 and 1975. On December 18, 1975, he was arrested for misdemeanor “assault by threat” against his mother, who later filed a petition for his indefinite commitment. He was subsequently committed following a finding by a jury that he was mentally ill and required hospitalization for an indeterminate period of time for his own welfare and the protection of others. Addington objected to the instructions given to the jury that employed a “clear, unequivocal and convincing” standard without success. He appealed his commitment to the Texas Court of Civil Appeals and argued that the standards of commitment violated his due process rights by using a standard less than that required for criminal convictions (i.e., beyond a reasonable doubt). The court agreed and reversed the judgment of the trial court. The State appealed to the Texas Supreme Court, which reversed the Court of Civil Appeals decision. The USSC granted cert.

Issue:

What standard of proof is required by the Fourteenth Amendment in civil commitment proceedings?

Holding: A clear and convincing standard of proof is required by the due process clause of the Fourteenth Amendment (vacated and remanded).

Rationale: The Court stated that applying a standard of proof is not an empty semantic exercise and that such standards reflect the value that society’s places on individual liberty. As involuntary civil commitment constitutes a significant deprivation of liberty that requires due process protection, a preponderance standard creates too much risk of erroneously committing individuals. However, civil commitment is not intended to be used punitively and should not be equated with a criminal prosecution. The Court argued that the “beyond a reasonable doubt” standard is a critical part of the “moral force of the criminal law” and should not be applied too

broadly or casually in noncriminal cases. The Court concluded that applying a criminal standard of proof was too strict since civil commitment results in “continuous opportunities for an erroneous commitment to be corrected.” In addition, such a standard of proof is used in part to establish factual issues in criminal proceedings and “[g]iven the lack of certainty and the fallibility of psychiatric diagnoses, there is a serious question as to whether a state could ever prove beyond a reasonable doubt that an individual is both mentally ill and likely to be dangerous.” As such, the Court concluded that using a middle-level standard of proof (i.e., clear and convincing) “strikes a fair balance between the rights of the individual and the legitimate concerns of the state.”