



Charles v. County of Orange (2nd Cir.)

Topics Covered: Mental Health Rights

Issue

The issue in this case is whether a county run immigration detention center violated the due process rights of two former detainees when they were released without a medical discharge plan.

AMA Interest

The AMA supports appropriate discharge planning for patients with mental illness.

Case Summary

Two plaintiffs, Michelet Charles and Carol Small, are legal permanent residents of the United States (“green card” holders). They were both detained in the immigration detention center maintained by Orange County, NY pending civil immigration proceedings. Those proceedings resulted in allowing the green card holders to remain in the United States.

The green card holders both suffered from serious mental health conditions. They received treatment, including psychotropic medications, while in detention. After each of their immigration proceedings, the green card holders were immediately released without continuing prescriptions for their medications or other discharge planning. Upon this release, the green card holders suffered mental breakdown, which required substantial medical care.

The green card holders sued in the United States District Court for the Southern District of New York for violation of their civil rights. They alleged that the County and its employees had violated their rights by failing to provide a medical plan for their discharge. Pursuant to a motion of the County, the district court dismissed the case. The court supported its decision by noting that while the nature of the claims was serious, the alleged violation did not meet the standard necessary for the plaintiffs to prevail. Particularly, the defendants’ behavior was not so egregious as to “shock the contemporary conscience.”

Plaintiffs appealed the district court order to the Court of Appeals.

AMA Involvement

The AMA joined the American Psychiatric Association and the American Public Health Association in filing an *amicus* brief in support of the plaintiffs. The brief discussed the importance of discharge planning in psychiatric care.

United States Court of Appeals for the Second Circuit brief