

IN RE E.C.

Submitted on Briefs May 30, 2013

Decided June 4, 2013

Panel: SAUFLEY, C.J., and ALEXANDER, LEVY, SILVER, GORMAN, and JABAR, JJ.

The mother of E.C. appeals from a judgment of the District Court (Lewiston, *Beliveau, J.*) terminating her parental rights pursuant to 22 M.R.S. § 4055(1)(B)(2) (2012). Contrary to the mother’s contentions, the proceedings before the trial court met the requirements of the Due Process Clause of the Fourteenth Amendment, *see Adoption of Tobias D.*, 2012 ME 45, ¶ 17, 40 A.3d 990; *In re Crystal S.*, 483 A.2d 1210, 1213 (Me. 1984), and in any event, her allegations regarding deficiencies in the Department’s reunification process do not establish a constitutional violation, *see Adoption of L.E.*, 2012 ME 127, ¶ 13 n.2, 56 A.3d 1234; *In re Daniel C.*, 480 A.2d 766, 770 (Me. 1984). Additionally, the mother’s assertion that the possible use of this involuntary termination of her parental rights as an aggravating factor in any future child protection proceedings is speculative and does not present a justiciable question. *See Varney v. Look*, 377 A.2d 81, 83 (Me. 1977) (“The adverse effect on the party must be something more than . . . speculative . . .”).

The entry is:

Judgment affirmed.

On the briefs:

N. Seth Levy, Esq., Brunswick, for appellant mother

Janet T. Mills, Attorney General, and Nora Sosnoff, Asst. Atty. Gen.,
Portland, for the appellee, Department of Health and Human Services