Appellate Court Decisions –Week of 11/21/22

Note: This is not a comprehensive list of every case released this week.

First Appellate District of Ohio

***State v. Patrick*, C-220049**

Sentencing; no-contact order; PRC

Full Decision: (No web cite as of yet).

Trial court erred when it imposed both a prison term and a no-contact order for the same offense; a no-contact order is a community-control sanction, but appellant was not sentenced to community control. Trial court also erred in failing to notify appellant of post-release control at the sentencing hearing. No-contact order vacated, and case remanded "for the limited purpose of holding a notification-of-postrelease-control hearing pursuant to R.C. 2929.191."

Second Appellate District of Ohio

***State v. Slaughter*, 2022-Ohio-3946**

Juror waiver

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/2/2022/2022-Ohio-3946.pdf

At a pretrial hearing conducted remotely with appellant not present, but appearing via video, appellant's oral waiver of a jury trial and defense counsel's signing the written jury waiver for appellant was not sufficient to satisfy the requirements of R.C. 2975.05. "The Ohio Supreme Court has consistently required strict compliance with the statutory requirements of R.C. 2945.05." Appellant's failure to personally sign the jury waiver rendered it invalid.

Third Appellate District of Ohio

Nothing to report.

Fourth Appellate District of Ohio

Nothing to report.

Fifth Appellate District of Ohio

Nothing to report.

Sixth Appellate District of Ohio

Nothing to report.

Seventh Appellate District of Ohio

Nothing to report.

Eighth Appellate District of Ohio

Nothing to report.

Ninth Appellate District of Ohio

Nothing to report.

Tenth Appellate District of Ohio

Nothing to report.

Eleventh Appellate District of Ohio

Nothing to report.

Twelfth Appellate District of Ohio

Nothing to report.

Supreme Court of Ohio

Nothing to report.

Sixth Circuit Court of Appeals

Nothing to report.

Supreme Court of the United States

Nothing to report.