Appellate Court Decisions –week of 3/30/26

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

First Appellate District of Ohio

***State v. Wilson*, 2026-Ohio-1178**

Consecutive sentences

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/1/2026/2026-Ohio-1178.pdf

Appellant's convictions affirmed. However, trial court erred when it imposed consecutive sentences without making "any of the requisite statutory findings under R.C. 2929.14(C)(4) . . . ." State concedes error. Case remanded for resentencing.

Second Appellate District of Ohio

Nothing to report.

Third Appellate District of Ohio

Nothing to report.

Fourth Appellate District of Ohio

***State v. Blevins*, 2026-Ohio-1181**

PRC

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/4/2026/2026-Ohio-1181.pdf

Convictions for drug offenses affirmed. However, trial court failed to advise appellant at sentencing "of the sanctions that the parole board could impose if he violate[d] any terms of his postrelease control" pursuant to R.C. 2967.28. State concedes error. Case remanded for sole purpose of advising appellant of PRC.

Fifth Appellate District of Ohio

***State v. Crable*, 2026-Ohio-1088**

Community control modifications

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-1088.pdf

Trial court erred in modifying the terms of appellant's community control sanctions when it imposed a jail term for her failure to make restitution payments "without without making '[a]ny finding with respect to [appellant's] capability of paying restitution or whether the failure to pay was willful or intentional.'" Case remanded for "trial court to determine if [a]ppellant's nonpayment of restitution was willful or if she failed to make a bona fide effort to pay."

***State v. Glenn*, 2026-Ohio-1063**

PRC

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-1063.pdf

After appellant violated his PRC with convictions for multiple offenses in two separate cases, trial court erred when it failed to calculate the exact number of days remaining on his PRC period for which it was imposing a consecutive sentence. Court also erred when it imposed PRC prison terms in both of appellant's new cases. The plain language of R.C. 2929.141 "authorizes the imposition of just one prison term as a post-release-control sanction because he was on post-release-control supervision in just one case." State concedes error. Cases remanded for resentencing.

***State v. Reedy*, 2026-Ohio-1119**

Forfeiture

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-1119.pdf

In convictions for drug and weapons offenses, trial court erred in ordering the forfeiture of appellant's cellphone where there was no forfeiture specification in her indictment. Also, appellant's negotiated plea where she

agreed to forfeit any contraband found by police during the search of her vehicle did not apply to the cellphone, as the COA held that it was not contraband. Court's order denying appellant's motion for return of her cellphone reversed, and case remanded with instructions to return the phone.

Sixth Appellate District of Ohio

***State v. Schafer*, 2026-Ohio-1172**

Forfeiture

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/6/2026/2026-Ohio-1172.pdf

In convictions for DUS and failure to comply, convictions affirmed. However, trial court erred in ordering the forfeiture of appellant's vehicle to the police department. Although there was a forfeiture specification in the indictment, "the jury did not make a finding of forfeiture pursuant to R.C. Chapter 2981, and [appellant] made no motion to request that the trial court make the forfeiture determination. The State concedes the error in this case and agrees that it is appropriate for this court to vacate the forfeiture order." Case remanded.

***State v. Doolittle*, 2026-Ohio-1160**

Jury waiver

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/6/2026/2026-Ohio-1160.pdf

In bench trial where trial court found appellant NGRI, appellant's jury waiver was not made knowingly, intelligently, nor voluntarily where "the court never personally spoke with [appellant], in open court, concerning the waiver of the right to trial by jury. The court did not inquire of [appellant] if he signed the jury waiver form, nor did [appellant] acknowledge or confirm that he wished to waive his right to a jury trial. Rather, the court simply confirmed with defense counsel that [appellant] had signed the jury waiver form." Therefore, since the "court did not strictly comply with R.C. 2945.05, specifically the open court requirement, [] the jury waiver is invalid. Moreover, in the absence of strict compliance with that statute, the trial court erroneously exercised its jurisdiction by trying [appellant] without a jury." Judgment reversed, and case remanded.

Seventh Appellate District of Ohio

Nothing to report.

Eighth Appellate District of Ohio

***State v. Woods*, 2026-Ohio-1204**

Suppression; warrantless search of residence

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/8/2026/2026-Ohio-1204.pdf

In state's appeal, trial court did not err when it granted appellee's MTS all evidence obtained in the warrantless search of his apartment. Although the COA found that there were sufficient facts to support the conclusion that appellee gave implied consent to the police to enter his apartment, the subsequent search of his bedroom was not lawful. "The circumstances of the instant matter, however, did not warrant the extended nature of the protective sweep. The police were not at [appellant's] apartment to arrest [appellant], and Alexis was not under arrest. [Appellant] came to the door voluntarily and did not show any sort of resistance to the officers. If the officers intended to act on his misdemeanor arrest warrant, they could have done so when [appellant] exited the apartment without incident and without the need to search the apartment any further. [Appellant] did not resist or protest when he was informed of the warrant and appeared calm and cooperative. Without consent to enter other areas of the apartment, and without a reason to believe that their safety was at risk, the officers could not and did not need to conduct a protective sweep of the bedroom where they discovered the firearm." Judgment affirmed.

***State v. Lewis*, 2026-Ohio-1202**

Postconviction relief

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/8/2026/2026-Ohio-1202.pdf

Trial court erred when it denied appellant's "timely petition for postconviction relief without issuing findings of fact and conclusions of law as required by R.C. 2953.21." State concedes error. Case remanded for court to include such findings and conclusions.

Ninth Appellate District of Ohio

***State v. Wesson*, 2026-Ohio-1141**

Death penalty/intellectual disability

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/9/2026/2026-Ohio-1141.pdf

Trial court erred when it denied appellant's Civ.R. 60(B) motion "seeking relief from the death penalty due to his intellectual disability . . . trial court misapplied the law in several respects when analyzing [appellant's] claim of intellectual disability. Those errors affected its entire analysis, as they led it to categorically disregard certain evidence and to rely upon much of the same type of flawed rationale the United States Supreme Court cautioned against in *Hall*, *Moore I*, and *Moore II*. See *Hall*, 572 U.S. 701 (2014); *Moore I*, 581 U.S. 1 (2017); *Moore II*, 586 U.S. 133 (2019)." Case remanded for court "to conduct a proper review."

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

***State v. Reed*, 2026-Ohio-1174**

Joinder/severance

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/0/2026/2026-Ohio-1174.pdf

Crim. R. 8(A) and 14—Crim.R. 8(A) permits offenses of same or similar character to be joined in a single indictment—Crim.R. 14 requires severance if a defendant is prejudiced by joinder—Severance is not

required if evidence is simple and direct—In applying simple-and-direct test, the inquiry is on whether the evidence of each offense is separate and direct, whether the evidence is uncomplicated, and whether jury is likely to be confused—Trial court did not abuse its discretion in determining that joinder was not prejudicial, because the evidence was simple and direct.

Sixth Circuit Court of Appeals

Nothing to report.

Supreme Court of the United States

Nothing to report.