Appellate Court Decisions –week of 8/3/26

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

First Appellate District of Ohio

***State v. Haywood*, C-250663**

Sentence/Reagan Tokes

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

Denial of motion to suppress and convictions affirmed. However, trial court erred when it imposed a 42-month to 63-month sentence for a first-degree felony where the sentencing range is 3 to 11 years. Court also failed to provide appellant with all the required notifications for indefinite sentences pursuant to R.C. 2929.19. State concedes error. Case remanded for resentencing.

***State v. Hubbard*, C-250562, 563, 564**

Sufficiency; window tint

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

Convictions for failure to comply and resisting arrest affirmed. Denial of motion to suppress affirmed. However, there was insufficient evidence to support the conviction for window-tint violation. "State's evidence fell short of proving the light transmittance of [appellant's] front windows. Joyce testified that [appellant's] 'front driver's side window measured at four percent.' But he failed to explain what 'four percent' reflected. With no mention of light transmittance, 'four percent' does not establish a violation of R.C. 4513.241. *See State v. French*, 72 Ohio St.3d 446, 452 (1995) ('the trial court committed reversible error by allowing the actual numerical figure of the BAC test to be introduced into evidence in the absence of expert testimony explaining the significance of the figure.')." Conviction reversed, and appellant discharged from further prosecution for that offense.

Second District of Ohio

Nothing to report.

Third Appellate District of Ohio

Nothing to report.

Fourth Appellate District of Ohio

***State v. Feagin*, 2026-Ohio-2928**

Reagan Tokes

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/4/2026/2026-Ohio-2928.pdf

Appellant's convictions affirmed. However, trial court erred when it imposed sentence without providing appellant with the "notifications required by R.C. 2929.19(B)(2)(c) for an indefinite prison sentence pursuant to the Reagan Tokes Act. State concedes error. Case remanded for resentencing.

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

***State v. Edding*, 2026-Ohio-2908**

Suppression/lack of findings of fact

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/9/2026/2026-Ohio-2908.pdf

Trial court erred in denying appellant's motion to suppress without making any findings of fact for the COA to review. Case remanded for "court to make findings of fact and address the motion to suppress in the first instance."

Tenth Appellate District of Ohio

Nothing to report.

Eleventh Appellate District of Ohio

Nothing to report.

Twelfth Appellate District of Ohio

***State v. Stringer-Smith*, 2026-Ohio-2976**

Consecutive sentences

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/12/2026/2026-Ohio-2976.pdf

Trial court erred in imposing consecutive sentences without "mak[ing] the statutorily required finding that the consecutive sentences were proportionate to the danger [appellant] posed to the public." Case remanded for resentencing.

Supreme Court of Ohio

Nothing to report.

Sixth Circuit Court of Appeals

Nothing to report.

Supreme Court of the United States

Nothing to report.