Appellate Court Decisions –week of 8/31/26

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

First Appellate District of Ohio

***State v. Reed*, C-250632**

***Bruen*; WUD/juvenile adjudication for violent felony**

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

Appellant's convictions for CCW and possessing a weapon while intoxicated affirmed. However, trial court erred when it denied appellant's motion to dismiss his WUD charge. COA find that the Second Amendment "prohibited his total and presumptively permanent disarmament based on his juvenile adjudication" for aggravated robbery with gun specs. "[T]he State has failed to provide sufficient historical support for its presumptively-permanent disarmament of [appellant] based on his prior juvenile adjudication. And COA further hold[s] that [appellant] was not required to have first raised his as-applied constitutional challenge by bringing an application under R.C. 2923.14." Conviction reversed, and case remanded with instructions to dismiss the WUD charge.

Second District of Ohio

Nothing to report.

Third Appellate District of Ohio

Nothing to report.

Fourth Appellate District of Ohio

Nothing to report.

Fifth Appellate District of Ohio

***State v. Kindred*, 2026-Ohio-3414**

Consecutive sentences

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-3414.pdf

Trial court plainly erred when it failed to make the required findings to support consecutive prison terms pursuant to R.C. 2929.14(C)(4) at the sentencing hearing and in the sentencing entry. Case remanded for resentencing.

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. Edelen*, 2026-Ohio-3426**

PRC

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/9/2026/2026-Ohio-3426.pdf

Convictions affirmed, but trial court erred when it failed to advise appellant that he was subject to a two-year discretionary PRC term for count two. Court also erred when it imposed both a prison term and conditions that appellant engage in sex offender treatment; have no unsupervised contact with minors; have his internet usage monitored; and to not ingest with drugs of abuse. Those conditions were akin to community control sanctions, but a court may not impose both a prison term and such community control sanctions. *See State v. Anderson*, 2015-Ohio-2089. Case remanded for court to vacate conditions and so advise appellant about PRC.

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.