Appellate Court Decisions –week of 9/14/26

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

First Appellate District of Ohio

***State v. Bell*, C-250533**

Sufficiency; failure to disclose personal information/public place

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

Convictions for OOB and DC affirmed. However, there was insufficient evidence to support conviction for failure to disclose personal information where the COA concluded that the back of a police car is not a "public place" as required by R.C. 2921.29. Conviction reversed, and appellant discharged from further prosecution on that 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. Browning*, 2026-Ohio-3561**

Suppression; warrantless traffic stop

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-3561.pdf

Trial court erred in denying appellant's motion to suppress the evidence obtained from a warrantless traffic stop. Although finding the traffic stop was unlawful, and the $718 found should be suppressed, the court nonetheless concluded that appellant's statements made soon after the stop were admissible. This was error. "*Miranda* warnings alone [cannot break]

the causal connection between an unlawful arrest and subsequent statement." *See Bronn v. Illinois*, 122 U.S. 590 (1975). Therefore, appellant's "statements were fruits of the unlawful seizure." And what the COA found very disturbing was "flagrancy" of the misconduct of the police. "A plan to conduct a field arrest of the appellant had been in place for at least a week before the stop. No warrant was sought. Detective Miller followed the appellant for several miles and observed no traffic violation or other arrestable offense. And the appellant was to be arrested on suspicion of drug trafficking regardless of whether the pre-arranged canine sniff resulted in an alert, and regardless of whether any contraband was recovered from the vehicle . . . It was a deliberate and pre-planned decision to arrest without a warrant and without regard to what any search might produce – the investigatory arrest that *Brown* identified as the conduct the exclusionary rule exists to deter. *Brown* at 602-603. If an officer's spontaneous and inchoate suspicion weighs in favor of suppression, a plan formed a week in advance and executed without regard to what the search would reveal does so more strongly still." Both the statement made by appellant immediately following the unlawful stop and seizure and her recorded statement made at the police station should have been suppressed.

However, the search warrant for appellant's camper was found to be independent from the traffic stop. Therefore, the trial court was correct in not ordering the search of the camper suppressed. Convictions reversed, and case remanded for Counts One through Five, as appellant had been found not guilty on Counts Six through Eleven.

***State v. Packard*, 2026-Ohio-3540**

PRC

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-3540.pdf

Conviction for DV affirmed. However, trial court erred when it failed to advise appellant "during the sentencing hearing that a PRC violation could result in the Parole Board returning the appellant to prison for up to fifty percent of the stated prison term, and that if the violation is a new felony the he may be returned to prison for the greater of one year or the time remaining on post-release control, consecutive to any prison sentence imposed for the new felony." Case remanded for limited purpose to advise appellant.

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.