Appellate Court Decisions –week of 9/8/26

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

First Appellate District of Ohio

***State v. Trevino*, C-250382**

***Batson* challenge**

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

Trial court erred in overruling appellant's *Batson* challenge where the prosecutor improperly excluded two prospective jurors from serving on the jury on the basis of their race . . . the State's explanation for its decision to remove at least one of the identified prospective jurors was pretextual rather than race-neutral. When asked to provide her rationale for using the majority of the State's peremptory strikes to excuse the only two African-American females from the jury, the prosecutor proffered a plausible reason—that a relative of one of the African-American jurors had served time in prison. But a similarly-situated white prospective juror, who also had a family member with ties to the criminal legal system was not stricken, even though that prospective juror expressed hostility towards law enforcement and the African-American juror did not." Conviction for soliciting reversed, and case remanded.

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

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

***State v. Smith*, 2026-Ohio-3472**

Sex offender registration; place of employment

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/0/2026/2026-Ohio-3472.pdf

Criminal law—R.C. 2950.05(F)(2)—Plain, ordinary meaning of "place of employment address," as used in sex-offender registration statute, is the physical environment where an offender performs work—Statute requiring registration of a new "place of employment address" not unconstitutionally vague as applied to offender who registered only the business address of his employer but not the address of the physical location where he worked for several weeks—Court of appeals' judgment upholding conviction affirmed.

Sixth Circuit Court of Appeals

Nothing to report.

Supreme Court of the United States

Nothing to report.