Appellate Court Decisions –week of 3/23/26

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

First Appellate District of Ohio

Nothing to report.

Second Appellate District of Ohio

***State v. Halderman*, 2026-Ohio-853**

Sex offender classification/ineffective assistance of counsel

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/2/2026/2026-Ohio-853.pdf

In reopened appeal, trial court erred by classifying appellant as a Tier I sex offender after his conviction for unlawful sexual conduct with a minor. Appellant was not a sex offender because "a sex offender does not include a defendant convicted of a sexually oriented offense if the offense involved 'consensual sexual conduct,' the victim 'was thirteen years of age or older,' and the defendant 'is not more than four years older than the victim.' R.C. 2950.01(B)(2)(b)." COA also finds that appellant's "trial counsel provided ineffective assistance by failing to object to his designation as a sex offender and that his prior appellate counsel provided ineffective assistance by failing to raise the issue on appeal." Designation of appellant as a sex offender is reversed, and case remanded for trial court to vacate designation.

Third Appellate District of Ohio

Nothing to report.

Fourth Appellate District of Ohio

Nothing to report.

Fifth Appellate District of Ohio

***State v. Rugg*, 2026-Ohio-1010**

Consecutive sentences; failure to advise at original sentencing hearing

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/5/2026/2026-Ohio-1010.pdf

Trial court erred in imposing consecutive sentences after revoking appellant's community control because court failed to advise him at the original sentencing hearing "that the reserved prison terms could be ordered to run consecutively." State concedes error. Imposition of consecutive sentences vacated, and case remanded for resentencing.

Sixth Appellate District of Ohio

Nothing to report.

Seventh Appellate District of Ohio

***State v. Hallowell*, 2026-Ohio-1036**

No contest plea

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/7/2026/2026-Ohio-1036.pdf

Appellant's no contest plea was not made knowingly, intelligently, nor voluntarily where the trial court failed to inform him of the effects of entering a no contest plea. Appellant also filed to "expressly tender his no contest plea on the record. Plea and conviction vacated, and case remanded.

Eighth Appellate District of Ohio

***State v. Griffin*, 2026-Ohio-925**

Attempted felony murder/invalid plea

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/8/2026/2026-Ohio-925.pdf

As appellant "pled guilty to attempted felony murder which is not a cognizable offense in Ohio" and is void, plea and conviction vacated. And "because [appellant's] conviction for failure to comply was part of a plea agreement, his remaining conviction also cannot stand. *See State v. Nolan*,

2014-Ohio-4800, ¶ 10 and *State v. Bozek*, 2016-Ohio-1305, ¶¶ 21, 26 (11th Dist.). Case remanded.

Ninth Appellate District of Ohio

Nothing to report.

Tenth Appellate District of Ohio

Nothing to report.

Eleventh Appellate District of Ohio

***Girard v. Adovasio*, 2026-Ohio-974**

Sufficiency; failure to file vacant building registration

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/11/2026/2026-Ohio-974.pdf

Appellant's conviction for property maintenance violations affirmed. However, state failed to present sufficient evidence to support appellant's conviction for failure to file a registration statement on a vacant building. The "City never introduced evidence that (1) [appellant] knew his building was vacant or (2) received notice to register the building as vacant." That conviction is reversed, and appellant discharged.

Twelfth Appellate District of Ohio

***State v. Conley*, 2026-Ohio-975**

Deficient complaint/subject matter jurisdiction

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/12/2026/2026-Ohio-975.pdf

In appellant's reopened appeal arising from his conviction for failure to disclose his personal information, the complaint failed to comply with Crim.R. 3 where the complaint "contains no numerical designation of the charged ordinance, and it fails to include a proper oath." Therefore, "[b]ecause the complaint fails to satisfy the requirements of Crim.R. 3, it is invalid and did not invoke the trial court's subject-matter jurisdiction." Conviction reversed, and appellant discharged.

***State v. Flecha*, 2026-Ohio-980**

PRC

Full Decision:
https://www.supremecourt.ohio.gov/rod/docs/pdf/12/2026/2026-Ohio-980.pdf

Trial court erred when it failed to orally advise appellant of the consequences of violating PRC as required by R.C. 2929.19(B)(2)(f). Case remanded for limited purpose for court to provide such advisement.

Supreme Court of Ohio

Nothing to report.

Sixth Circuit Court of Appeals

Nothing to report.

Supreme Court of the United States

Nothing to report.