

OHIO COURT OF APPEALS, TWELFTH APPELLATE DISTRICT, BUTLER
COUNTY

State v. Williams

2026-Ohio-2033 · No. CA2025-07-078 · Decided June 1, 2026

SUMMARY

The Ohio Twelfth District Court of Appeals affirmed Germaine Montel Williams's sentence following his guilty plea to aggravated assault. The court held that Williams's challenge to a community-control condition restricting his presence on Kunz Avenue was procedurally barred under the invited-error doctrine and, alternatively, that the condition was neither overbroad nor unreasonable.

CASE DETAILS

COURT	Ohio Court of Appeals, Twelfth Appellate District, Butler County
WRITING FOR THE COURT	Robert A. Hendrickson, Presiding Judge; Mike Powell, Judge; Melena S. Siebert, Judge
JURISDICTION	Ohio Court of Appeals, Twelfth District, Butler County
DECIDED	June 1, 2026
DOCKET	CA2025-07-078
DISPOSITION	affirmed
PROCEDURAL POSTURE	Williams appealed the sentence imposed after he pleaded guilty to the reduced charge of aggravated assault, challenging a community-control condition restricting his presence on Kunz Avenue.
STANDARD OF REVIEW	Community-control sanctions are generally reviewed for abuse of discretion. Because Williams did not object to the challenged condition, the court reviewed for plain error, requiring an obvious error that affected the outcome and resulted in a manifest miscarriage of justice.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Germaine Montel Williams v. State of Ohio

TOPICS

- probation
- sentencing
- preservation of error
- standard of review
- appellate procedure

PRACTICE AREAS

criminal law

sentencing

community control

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court committed plain error by imposing a community-control condition restricting Williams's presence on Kunz Avenue.
2. Whether the condition was overbroad and unreasonable because it allegedly required Williams to leave his residence and was not reasonably related to rehabilitation, the offense, or preventing future criminality.
3. Whether the invited-error doctrine barred Williams from challenging a community-control condition that he and his counsel helped formulate.

HOLDINGS

1. The invited-error doctrine barred Williams from obtaining relief because he and his counsel actively participated in crafting the restriction and agreed to the condition that he later challenged.
2. The restriction on Williams's presence in the Kunz Avenue neighborhood was not overbroad or unreasonable and did not constitute plain error.
3. Because Williams did not object to the community-control condition in the trial court, any review was limited to plain error, and no plain error occurred.

KEY QUOTATIONS

"However, a court will not be found to have abused its discretion in fashioning a community control sanction as long as the condition is reasonably related to the probationary goals of doing justice, rehabilitating the offender, and insuring good behavior." (§ 12)

"In determining whether a community control sanction is related to the three probationary goals above, courts must "consider whether the condition (1) is reasonably related to rehabilitating the offender, (2) has some relationship to the crime of which the offender was convicted, and (3) relates to conduct which is criminal or reasonably related to future criminality and serves the statutory ends of probation." (§ 13)

"[U]nder the settled principle of invited error, a litigant may not take advantage of an error which he himself invited or induced" (§ 16)

FACTUAL BACKGROUND

Williams was involved in an altercation with a neighbor near the Kunz Avenue address, during which he struck the victim in the head with a hammer and the leg with a rake. He was initially indicted for felonious assault but pleaded guilty to reduced aggravated assault. At sentencing, the trial court restricted his presence in the Kunz Avenue neighborhood because of the incident and his strained relationships with the victim and other neighbors, while allowing limited access to assist with lawn and home care. Williams and his counsel participated in crafting the condition, and Williams did not object when it was imposed.

PROCEDURAL HISTORY

A Butler County grand jury indicted Williams for second-degree felony felonious assault. Pursuant to an agreement with the State, Williams pleaded guilty to fourth-degree felony aggravated assault. The Butler County Court of Common Pleas imposed five years of community control, including a condition generally barring Williams from the Kunz Avenue neighborhood while permitting limited weekly access to the property. Williams did not object to the condition at sentencing and appealed; the Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Logan, 2025-Ohio-1772, ¶ 20
- State v. Ballish, 2026-Ohio-503, ¶ 10
- State v. Ellis, 2022-Ohio-2330, ¶¶ 24-25 (12th Dist.)
- State v. Lang, 2011-Ohio-4215, ¶ 108
- State v. Blankenburg, 2012-Ohio-1289, ¶ 53 (12th Dist.)
- State v. Oghojafor, 2023-Ohio-44, ¶ 104 (12th Dist.)
- State v. Chapman, 2020-Ohio-6730, ¶¶ 8, 23
- State v. Jones, 49 Ohio St.3d 51, 53 (1990)
- State v. Talty, 2004-Ohio-4888, ¶ 12
- State v. Murphy, 2001-Ohio-112, ¶ 122
- State v. Kinsworthy, 2014-Ohio-1584, ¶ 28 (12th Dist.)
- State v. Keever, 2012-Ohio-4643, ¶¶ 16, 21-22 (12th Dist.)
- Lakewood v. Bretzfelder, 2013-Ohio-4477, ¶¶ 43-45 (8th Dist.)