

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT

State v. Crowley

2026-Ohio-1402 · No. 2025CA00112 · Decided April 17, 2026

SUMMARY

The Ohio Court of Appeals for the Fifth Appellate District affirmed the denial of Dennis Crowley’s motion to suppress evidence discovered during an inventory search following a traffic stop. The court held that the officer had reasonable and articulable suspicion to stop Crowley based on the vehicle’s loud muffler, in violation of Ohio Revised Code § 4513.22(A).

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District
WRITING FOR THE COURT	Andrew J. King; William B. Hoffman; Kevin W. Popham
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District
DECIDED	April 17, 2026
DOCKET	2025CA00112
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed the denial of his motion to suppress evidence obtained after a traffic stop. After the motion was denied, he pleaded no contest, was found guilty of possession of cocaine, and was sentenced to three years of community control.
STANDARD OF REVIEW	Appellate review of a motion to suppress presents a mixed question of law and fact. The appellate court accepts factual findings supported by competent, credible evidence but independently reviews de novo whether those facts satisfy the applicable legal standard. Determinations of reasonable suspicion and probable cause are generally reviewed de novo.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Dennis Crowley v. State of Ohio

TOPICS

- suppression of evidence
- fourth amendment
- search and seizure
- standard of review
- appellate procedure

PRACTICE AREAS

Criminal procedure

Fourth Amendment

Appellate procedure

QUESTIONS PRESENTED

1. Whether the officer had reasonable articulable suspicion to initiate a traffic stop based on the vehicle's loud muffler.
2. Whether the trial court properly denied Crowley's motion to suppress.

HOLDINGS

1. Determinations of reasonable suspicion and probable cause should generally be reviewed de novo on appeal after the appellate court accepts supported factual findings by the trial court.
2. A traffic stop is constitutionally valid when an officer personally observes a traffic violation or has a reasonable and articulable suspicion that the motorist has committed, is committing, or is about to commit a crime. Under the totality of the circumstances, the officer had reasonable articulable suspicion that Crowley's vehicle violated Ohio's muffler statute because the muffler produced excessive or unusual noise.

KEY QUOTATIONS

"On appeal, we "must accept the trial court's findings of fact if they are supported by competent, credible evidence." (¶ 9)

"Accepting those facts as true, we must then "independently determine as a matter of law, without deference to the conclusion of the trial court, whether the facts satisfy the applicable legal standard." (¶ 9)

"We concur with the trial court that Officer Webb had specific articulable facts giving rise to a reasonable suspicion that Crowley was in violation of R.C. 4513.22(A) and the traffic stop was proper." (¶ 16)

FACTUAL BACKGROUND

A Jackson Township police officer stopped Dennis Crowley after hearing what he believed was excessive or unusual noise from Crowley's vehicle's muffler. During the stop, the officer learned that Crowley's New York driver's license was suspended, ordered the vehicle towed, and conducted an inventory search that revealed powdered cocaine between the driver's seat and center console. Body-camera footage corroborated the officer's testimony that the muffler produced a notable rumble, and the officer consistently testified that the stop was based on noise rather than exhaust odor.

PROCEDURAL HISTORY

A Stark County grand jury indicted Crowley for possession of cocaine. The trial court denied his motion to suppress, finding that the officer had reasonable articulable suspicion to stop him for a loud muffler. Crowley then pleaded no contest, was convicted and sentenced, and appealed the suppression ruling. The Fifth District affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Leak, 2016-Ohio-154, ¶ 12
- State v. Burnside, 100 Ohio St. 3d 152, 2003-Ohio-5372, 797 N.E.2d 71, ¶ 8
- State v. Mills, 62 Ohio St. 3d 357, 366, 582 N.E.2d 972 (1992)
- State v. Fanning, 1 Ohio St. 3d 19, 20, 437 N.E.2d 583 (1982)
- State v. Mays, 2008-Ohio-4539
- State v. Orr, 2001 Ohio 50
- Dayton v. Erickson, 76 Ohio St. 3d 3 (1996)
- Delaware v. Prouse, 440 U.S. 648 (1979)
- State v. Freeman, 64 Ohio St. 2d 291 (1980)
- State v. Rayburn, 2019-Ohio-1028 (5th Dist.)
- State v. Williams, 2007-Ohio-4617 (2d Dist.)