

COURT OF APPEALS OF OHIO, FOURTH APPELLATE DISTRICT,
LAWRENCE COUNTY

State v. McKnight

2026-Ohio-2346 · No. 25CA14, 25CA15 · Decided June 9, 2026

SUMMARY

The Ohio Fourth District Court of Appeals affirmed Rickey L. McKnight’s burglary and felonious-assault convictions and the sentence imposed for violating community-control sanctions. The court held that the evidence sufficiently supported findings that McKnight trespassed by stealth and that the jury reasonably rejected his self-defense claim. The court also affirmed the community-control-violation judgment because McKnight did not assign error to it.

CASE DETAILS

COURT	Court of Appeals of Ohio, Fourth Appellate District, Lawrence County
WRITING FOR THE COURT	Peter B. Abele; Smith, P.J.; Hess, J.
JURISDICTION	Ohio Court of Appeals, Fourth Appellate District, Lawrence County
DECIDED	June 9, 2026
DOCKET	25CA14, 25CA15
DISPOSITION	affirmed
PROCEDURAL POSTURE	Consolidated criminal appeal from Lawrence County Common Pleas Court judgments convicting McKnight of burglary and felonious assault, sentencing him to prison, and imposing a sentence for violating community-control sanctions.
STANDARD OF REVIEW	For manifest-weight review, the appellate court reviews the entire record, weighs the evidence and reasonable inferences, and considers witness credibility, while deferring substantially to the fact finder. A conviction may be reversed only in the exceptional case in which the fact finder clearly lost its way and created a manifest miscarriage of justice. For sufficiency review, the court considers whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could find the essential elements beyond a reasonable doubt; credibility is not assessed.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion

PARTIES

Rickey L. McKnight v. State of Ohio

TOPICS

criminal procedure

appellate procedure

evidence

self defense

standard of review

PRACTICE AREAS

criminal law

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evidence

QUESTIONS PRESENTED

1. Whether McKnight's burglary conviction was supported by sufficient evidence and was not against the manifest weight of the evidence, particularly as to trespass and entry by stealth or deception.
2. Whether McKnight's felonious-assault conviction was against the manifest weight of the evidence because he acted in self-defense.
3. Whether the trial court's judgment imposing a sentence for a community-control violation should be affirmed when McKnight assigned no error to that judgment.

HOLDINGS

1. A person may commit trespass and burglary against property the person legally owns when another person has control or custody of the property; therefore, McKnight's alleged landlord status and possession of a key did not preclude a finding of trespass.
2. Any privilege to enter or remain on the premises was withdrawn when McKnight assaulted J.M.; the victim's instruction to leave independently revoked any consent.
3. The evidence was sufficient and supported the jury's manifest-weight finding that McKnight trespassed by stealth when he used a key to enter the residence without announcing his presence and entered the room while J.M. was sleeping.
4. McKnight's burglary conviction was not against the manifest weight of the evidence.
5. McKnight's felonious-assault conviction was not against the manifest weight of the evidence because the jury could reasonably find beyond a reasonable doubt that McKnight was at fault in creating the altercation and therefore did not act in self-defense.
6. The community-control-violation judgment was affirmed because McKnight did not assign error to that judgment.

KEY QUOTATIONS

“The legal concepts of sufficiency of the evidence and weight of the evidence are both quantitatively and qualitatively different.” (§ 13)

“A reviewing court should find a conviction against the manifest weight of the evidence only in the “exceptional case in which the evidence weighs heavily against the conviction.”” (§ 15)

“a sufficiency challenge requires a reviewing court to determine “whether the evidence presented, when viewed in a light most favorable to the prosecution, would allow any rational trier of fact to find the essential elements of the crime beyond a reasonable doubt”” (¶ 16)

FACTUAL BACKGROUND

On December 10, 2024, Rickey McKnight entered the residence of J.M., who rented the property from McKnight's family, and an altercation occurred. J.M. testified that McKnight entered without permission, awakened him, pushed him into a drum set, and struck him near the eye, causing serious injuries. McKnight claimed that he entered with a key pursuant to an alleged agreement allowing him to come and go and that J.M. initiated the confrontation by poking or headbutting him. The jury acquitted McKnight of aggravated burglary but convicted him of burglary and felonious assault.

PROCEDURAL HISTORY

A Lawrence County grand jury indicted McKnight for aggravated burglary and felonious assault. After a jury trial, the jury acquitted him of aggravated burglary but found him guilty of burglary and felonious assault; the trial court imposed prison terms of 18 months and six years, respectively, and separately imposed a prison sentence for a community-control violation. McKnight appealed, challenging the sufficiency and manifest weight of the evidence. The Fourth District overruled his sole assignment of error and affirmed both judgments.

DISPOSITION

affirmed

CASES CITED

- State v. Thompkins, 78 Ohio St.3d 380, 386-387 (1997)
- State v. Beasley, 2018-Ohio-493, ¶ 208
- State v. McKelton, 2016-Ohio-5735, ¶ 328
- Eastley v. Volkman, 2012-Ohio-2179, ¶ 21
- State v. Issa, 93 Ohio St.3d 49, 67 (2001)
- State v. Murphy, 2008-Ohio-1744, ¶ 31 (4th Dist.)
- Barberton v. Jenney, 2010-Ohio-2420, ¶ 20
- State v. Konya, 2006-Ohio-6312, ¶ 6 (2d Dist.)
- State v. Lawson, 1997 WL 476684 (2d Dist. Aug. 22, 1997)
- Seasons Coal Co., Inc. v. Cleveland, 10 Ohio St.3d 77, 80 fn. 3 (1984)
- State v. Picklesimer, 2012-Ohio-1282, ¶ 24 (4th Dist.)
- State v. Howard, 2007-Ohio-6331, ¶ 6 (4th Dist.)
- State v. Leonard, 2004-Ohio-6235, ¶ 81
- State v. Getsy, 84 Ohio St.3d 180, 193-194 (1998)
- State v. Eley, 56 Ohio St.2d 169 (1978)

- Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/ohio-court-of-appeals-fourth-appellate-district-lawrence-county-court-of-appeals-of-ohio-fourth-appel/2026/state-v-mcknight-21o1qucl>