

COURT OF APPEALS OF OHIO, TENTH APPELLATE DISTRICT

State v. Holtz

2025-Ohio-5646 · No. 24AP-745 · Decided December 18, 2025

SUMMARY

The Tenth District Court of Appeals of Ohio affirmed Eric W. Holtz’s convictions for rape of a child under 13 and gross sexual imposition, as well as his aggregate sentence of 18 years to life. The court held that the victim’s forensic interview supplied sufficient evidence and that the convictions were not against the manifest weight of the evidence. It also upheld consecutive sentences, concluding that the trial court’s proportionality findings satisfied Ohio sentencing requirements.

CASE DETAILS

COURT	Court of Appeals of Ohio, Tenth Appellate District
WRITING FOR THE COURT	Beatty Blunt, J.; Mentel, J.; Dingus, J.
JURISDICTION	Ohio Court of Appeals, Tenth Appellate District
DECIDED	December 18, 2025
DOCKET	24AP-745
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed after a bench trial in which the Franklin County Court of Common Pleas convicted him of rape and gross sexual imposition and imposed an aggregate sentence of 18 years to life.
STANDARD OF REVIEW	Sufficiency of the evidence is reviewed by asking whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements proven beyond a reasonable doubt. Manifest-weight review requires examination of the entire record, weighing the evidence and reasonable inferences, considering witness credibility, and determining whether the factfinder clearly lost its way and created a manifest miscarriage of justice. Consecutive-sentence findings are reviewed under the applicable Ohio sentencing statute, with no talismanic recitation required if the necessary findings appear in the record and sentencing entry.
PRECEDENTIAL VALUE	published
PARTIES	Eric W. Holtz v. State of Ohio

TOPICS

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QUESTIONS PRESENTED

1. Whether the convictions for rape and gross sexual imposition were supported by sufficient evidence.
2. Whether the convictions were against the manifest weight of the evidence.
3. Whether the trial court lawfully imposed consecutive sentences under R.C. 2929.14(C)(4).

HOLDINGS

1. The child's statements during the forensic interview constituted sufficient evidence of sexual contact and supported the essential elements of both rape and gross sexual imposition.
2. The convictions were not against the manifest weight of the evidence.
3. The trial court's finding that the consecutive sentence was not disproportionate to the totality of the crimes satisfied the proportionality requirement for consecutive sentences, and the consecutive sentences were not erroneous.

KEY QUOTATIONS

“The relevant inquiry is whether, after viewing the evidence in a light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime proven beyond a reasonable doubt.” (¶ 9)

“An appellate court considering a manifest weight challenge “may not merely substitute its view for that of the trier of fact, but must review the entire record, weigh the evidence and all reasonable inferences, consider the credibility of witnesses, and determine whether, in resolving conflicts in the evidence, the trier of fact clearly lost its way and created such a manifest miscarriage of justice that the conviction must be reversed and a new trial ordered.”” (¶ 10)

“Under Jones, we must conclude that the trial court’s statement that Holtz’s sentence is “not disproportionate to the totality of the crimes” is equivalent to the finding that Holtz’s sentence is “not disproportionate to . . . the danger the offender poses to the public.”” (¶ 15)

FACTUAL BACKGROUND

Holtz lived with his former girlfriend and her eight-year-old daughter during 2021 and 2022. After the child moved to her biological father's home, she disclosed that Holtz had touched her private areas and later described vaginal touching over her clothing and oral contact during a forensic interview. A physical examination revealed no specific trauma, but the examining physician testified that the findings were consistent with the reported contact and the elapsed time. The trial court relied principally on the child's forensic-interview statements and imposed consecutive sentences after convicting Holtz of rape and gross sexual imposition.

PROCEDURAL HISTORY

The trial court found Holtz guilty of first-degree felony rape of a minor under thirteen and third-degree felony gross sexual imposition after a bench trial. It imposed consecutive sentences of fifteen years to life for rape and three years for gross sexual imposition. Holtz challenged the sufficiency and manifest weight of the evidence and the imposition of consecutive sentences. The Court of Appeals overruled both assignments of error and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Jenks, 61 Ohio St.3d 259 (1991)
- Jackson v. Virginia, 443 U.S. 307 (1979)
- State v. DeHass, 10 Ohio St.2d 230 (1967)
- State v. Raver, 2003-Ohio-958, ¶ 21 (10th Dist.)
- State v. Antill, 176 Ohio St. 61, 67 (1964)
- State v. Dear, 2014-Ohio-5104, ¶ 11 (10th Dist.)
- State v. Davis, 2018-Ohio-58, ¶ 23 (10th Dist.)
- State v. Harris, 2014-Ohio-2501, ¶ 22 (10th Dist.)
- State v. Thompkins, 78 Ohio St.3d 380, 387 (1997)
- State v. Martin, 20 Ohio App.3d 172, 175 (1st Dist. 1983)
- State v. Jones, 2024-Ohio-1083, ¶¶ 6-8
- State v. Bonnell, 2014-Ohio-3177, ¶ 37