

COURT OF APPEALS OF OHIO, EIGHTH APPELLATE DISTRICT,
CUYAHOGA COUNTY

City of South Euclid v. Datwan Hall

2026-Ohio-1198 · No. 115445 · Decided April 2, 2026

SUMMARY

The Eighth District Court of Appeals affirmed Datwan Hall's domestic-violence conviction under R.C. 2919.25(A). The court held that Hall could not claim self-defense because he was at fault in creating the confrontation, and counsel was not ineffective for failing to provide notice of a futile self-defense claim. The court also concluded that sufficient evidence supported the conviction.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Eileen T. Gallagher; Lisa B. Forbes; Anita Laster Mays
JURISDICTION	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
DECIDED	April 2, 2026
DOCKET	115445
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hall appealed his bench-trial conviction for domestic violence from the South Euclid Municipal Court, challenging the rejection of self-defense, the effectiveness of trial counsel, and the sufficiency of the evidence.
STANDARD OF REVIEW	For ineffective assistance of counsel, the court applied the Strickland performance-and-prejudice standard. For sufficiency of the evidence, the court viewed the admitted evidence in the light most favorable to the prosecution and asked whether any rational trier of fact could have found the essential elements proven beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Datwan Hall v. City of South Euclid

TOPICS

- self defense
- ineffective assistance
- criminal procedure
- appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

QUESTIONS PRESENTED

1. Whether the prosecution disproved self-defense beyond a reasonable doubt.
2. Whether trial counsel rendered ineffective assistance by failing to file written notice of an intent to present self-defense under Crim.R. 12.2.
3. Whether sufficient evidence supported Hall's domestic-violence conviction under R.C. 2919.25(A).

HOLDINGS

1. Hall was not entitled to assert self-defense because the uncontroverted evidence established that he created the situation giving rise to the altercation by entering D.W.'s apartment without permission, pushing his way inside, taking her phone, and refusing to return it.
2. Trial counsel was not ineffective for failing to file written notice of an intent to present self-defense because asserting self-defense would have been futile, and the failure to perform a futile act cannot establish deficient performance or prejudice.
3. Sufficient evidence supported Hall's conviction because the victim's testimony and authenticated photographs established that Hall knowingly caused or attempted to cause physical harm to a family or household member.

KEY QUOTATIONS

“The failure to do a futile act cannot be the basis for a claim of ineffective assistance of counsel, nor could such a failure be prejudicial.” (II.A)

“a person cannot provoke assault or voluntarily enter an encounter and then claim a right of self-defense.” (II.A)

“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.” (II.B)

FACTUAL BACKGROUND

Datwan Hall entered D.W.'s apartment unannounced, pushed his way inside, took her phone, and refused to return it while demanding repayment of money. When D.W. tried to retrieve the phone, Hall pushed her, placed his hands around her neck, and pushed or attempted to throw her into a wall and over a couch. D.W. sustained cuts and scrapes to her neck and a scrape on her foot, which were observed by a responding officer and documented in photographs admitted at trial.

PROCEDURAL HISTORY

Hall was charged with domestic violence under R.C. 2919.25(A). After a bench trial, the South Euclid Municipal Court found him guilty and imposed a suspended 30-day jail sentence, six months of active probation, a \$500

fine, and court costs. The Ohio Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Strickland v. Washington, 466 U.S. 668 (1984)
- State v. Yancy, 2025-Ohio-5135, ¶ 55
- State v. Carter, 2017-Ohio-8847, ¶ 27
- State v. Knox, 2013-Ohio-1662, ¶ 20
- State v. Ford, 2007-Ohio-5722, ¶ 9
- State v. Davis, 2021-Ohio-4015, ¶ 26
- State v. Messenger, 2022-Ohio-4562, ¶¶ 1, 15
- State v. Barnes, 94 Ohio St.3d 21 (2002)
- State v. Sekic, 2011-Ohio-3978, ¶ 15
- State v. Nichols, 2002 Ohio App. LEXIS 329 (4th Dist. Jan. 22, 2002)
- State v. Smith, 2020-Ohio-4976, ¶ 53
- State v. Jenks, 61 Ohio St.3d 259 (1991), paragraph two of the syllabus
- Jackson v. Virginia, 443 U.S. 307 (1979)