

OHIO COURT OF APPEALS, NINTH JUDICIAL DISTRICT

State v. Head

2026-Ohio-700 · No. 2025CA0055-M · Decided March 2, 2026

SUMMARY

The Ninth District Court of Appeals of Ohio affirmed Victor Head’s conviction-related sentence imposing a 20-year driver’s license suspension for failure to comply with a police order or signal. The court held that the suspension was within the statutory range and that the record supported the trial court’s consideration of the applicable felony-sentencing purposes and factors.

CASE DETAILS

COURT	Ohio Court of Appeals, Ninth Judicial District
WRITING FOR THE COURT	Scot Stevenson; Flagg Lanzinger; Sutton
JURISDICTION	Ohio Court of Appeals, Ninth Judicial District
DECIDED	March 2, 2026
DOCKET	2025CA0055-M
DISPOSITION	affirmed
PROCEDURAL POSTURE	Victor Head appealed from the Medina County Court of Common Pleas judgment imposing a 20-year driver's license suspension after he pleaded guilty to an amended felony charge of failure to comply with an order or signal of a police officer.
STANDARD OF REVIEW	Under R.C. 2953.08(G)(2), an appellate court may vacate or modify a felony sentence only if clear and convincing evidence shows that the record does not support the trial court's findings under the relevant statutes or that the sentence is otherwise contrary to law.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Victor Head v. State of Ohio

TOPICS

- sentencing
- standard of review
- criminal procedure
- appellate procedure
- probation

PRACTICE AREAS

- criminal law
- criminal procedure
- felony sentencing
- driver's license suspension

QUESTIONS PRESENTED

1. Whether the trial court erred by imposing a 20-year driver's license suspension without expressly discussing the purposes of felony sentencing, seriousness and recidivism factors, or the minimum three-year suspension.
2. Whether the record clearly and convincingly failed to support the 20-year license suspension or established that the sentence was otherwise contrary to law.

HOLDINGS

1. A trial court must consider the statutory sentencing factors applicable to every felony case, but neither R.C. 2929.11 nor R.C. 2929.12 requires the court to make specific factual findings, explain its reasons for imposing the sentence, or work through each statutory factor on the record.
2. Head failed to establish by clear and convincing evidence that the record did not support the trial court's findings or that the 20-year driver's license suspension was otherwise contrary to law. The suspension was mandatory in some period under R.C. 2921.331 and fell within the statutory range under R.C. 4510.02(A)(2).

KEY QUOTATIONS

“an appellate court may vacate or modify a felony sentence on appeal only if it determines by clear and convincing evidence that the record does not support the trial court’s findings under relevant statutes or that the sentence is otherwise contrary to law.” (¶11)

“Nevertheless, ‘the court must carefully consider the statutes that apply to every felony case[,]’ including ‘R.C. 2929.11, which specifies the purposes of sentencing, and R.C. 2929.12, which provides guidance in considering factors relating to the seriousness of the offense and recidivism of the offender.’” (¶12)

“The record supports the conclusion that the court considered the statutory factors when it imposed a 20-year driver’s license suspension.” (¶18)

FACTUAL BACKGROUND

Head led police on a roughly 20-minute pursuit on Interstate 71 after failing to stop when officers activated their lights. His driving was reckless and endangered officers and others; the pursuit ended only after police used spike sticks to stop his vehicle. After plea negotiations, he pleaded guilty to an amended fourth-degree-felony charge and acknowledged his conduct and cannabis use disorder at the plea and sentencing hearing.

PROCEDURAL HISTORY

A Medina County grand jury indicted Head for third-degree-felony failure to comply with an order or signal of a police officer. Pursuant to plea negotiations, the indictment was amended to a fourth-degree felony, Head pleaded guilty, and the trial court imposed two years of nonresidential community control and a 20-year driver's license suspension. Head appealed only the length of the license suspension.

DISPOSITION

affirmed

CASES CITED

- State v. Marcum, 2016-Ohio-1002, ¶1
- Cross v. Ledford, 161 Ohio St. 469, 477 (1954)
- State v. Foster, 2006-Ohio-856, paragraph seven of the syllabus
- State v. Lucas, 2019-Ohio-2607, ¶13 (9th Dist.)
- State v. Mathis, 2006-Ohio-855, ¶38
- State v. Jones, State v. Jones, 2020-Ohio-6729, ¶20
- State v. Godschild, 2025-Ohio-5085, ¶21, ¶25-26 (9th Dist.)
- State v. Farakhan, 2024-Ohio-1260, ¶7 (9th Dist.)

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