

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

State v. Clark

2025-Ohio-5342 · No. 114808 · Decided November 26, 2025

SUMMARY

The Ohio Eighth District Court of Appeals affirmed Sunleaf Clark’s conviction and sentence for second-degree felonious assault based on complicity in a shooting committed by her son. The court held that the trial court’s complicity instructions, considered together with the instructions on the underlying offense and mens rea, were legally sufficient and nonprejudicial. The court also held that sufficient circumstantial evidence supported Clark’s conviction and that the conviction was not against the manifest weight of the evidence.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Michelle J. Sheehan; Eileen A. Gallagher; Mary J. Boyle
JURISDICTION	Ohio Court of Appeals, Eighth Appellate District, Cuyahoga County
DECIDED	November 26, 2025
DOCKET	114808
DISPOSITION	affirmed
PROCEDURAL POSTURE	Clark appealed her jury-trial conviction and sentence for second-degree felonious assault under a complicity theory.
STANDARD OF REVIEW	The legal sufficiency of jury instructions is reviewed de novo, and a conviction will not be reversed for instructional error absent clear prejudicial error. Sufficiency of the evidence is reviewed as a question of law by viewing the evidence in the light most favorable to the prosecution and determining whether any rational trier of fact could find the essential elements beyond a reasonable doubt. Manifest-weight review requires 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.
PRECEDENTIAL VALUE	Published opinion; precedential within the applicable Ohio appellate framework.

TOPICS

criminal procedure

jury instructions

mens rea

evidence

appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

appellate litigation

evidence

QUESTIONS PRESENTED

1. Whether the trial court's complicity jury instructions were legally incomplete because they did not separately repeat the knowingly mens rea or expressly state that Clark had to share the principal's criminal intent.
2. Whether sufficient evidence supported Clark's conviction for felonious assault under a complicity theory.
3. Whether Clark's conviction was against the manifest weight of the evidence because of witness inconsistencies and allegedly conflicting physical evidence.

HOLDINGS

1. The complicity instructions were legally sufficient when read as a whole because the trial court instructed the jury on the knowingly culpable mental state for the underlying felonious-assault offense and instructed that an aider and abettor acts with the intent to aid the principal. The court was not required to repeat the mens rea instruction in the complicity portion of the charge.
2. Sufficient evidence supported Clark's conviction because, viewed in the light most favorable to the State, a rational jury could infer from her motive, communications with Jayse, conduct immediately before and during the shooting, and conduct afterward that she aided and abetted Jayse while sharing the criminal intent required for the felonious assault.
3. The conviction was not against the manifest weight of the evidence because the jury did not clearly lose its way in resolving witness inconsistencies, assessing credibility, and weighing the eyewitness and physical evidence.

KEY QUOTATIONS

“Whether jury instructions correctly state the law is a legal issue that an appellate court reviews de novo” (¶ 27)

“The court was not required to repeat the mens rea instruction with respect to complicity.” (¶ 31)

“participation in criminal intent may be inferred from presence, companionship and conduct before and after the offense is committed.” (¶ 43)

“the mere presence of an accused at the scene of a crime . . . is insufficient to prove, in and of itself, that the accused was an aider and abettor.” (¶ 44)

FACTUAL BACKGROUND

On August 13, 2023, tensions between Clark's family and R.A.'s family escalated into a physical altercation at a cheerleading competition. After additional confrontations, Clark drove to R.A.'s house with family members, and her son Jayse exited another vehicle and fired multiple shots toward the house, seriously injuring R.A.'s niece K.A. The court relied on evidence of Clark's motive, her communications with Jayse before the shooting, her conduct at the scene, and her conduct after the shooting to conclude that a jury could infer she aided and abetted Jayse.

PROCEDURAL HISTORY

Clark was charged in a seven-count indictment arising from a shooting committed by her son, Jayse Fitch. After a jury trial, she was convicted of felonious assault as charged in Count 2, acquitted of the firearm specifications and Counts 1, 3, 4, 5, and 6, and obtained a Crim.R. 29 acquittal on Count 7. The trial court imposed an indefinite sentence of two to three years, and the Court of Appeals affirmed.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The case was remanded to the trial court solely for execution of the affirmed sentence; the mandate directed the common pleas court to carry the judgment into execution.

CASES CITED

- State v. Echevarria, 2018-Ohio-1193, ¶¶ 27-29 (8th Dist.)
- State v. Williams, 2015-Ohio-172, ¶ 35 (8th Dist.)
- State v. White, 2015-Ohio-492, ¶ 46
- State v. Comen, 50 Ohio St.3d 206 (1990)
- State v. Mincey, 2018-Ohio-662, ¶¶ 27, 30 (1st Dist.)
- State v. Hinton, 2014-Ohio-490, ¶¶ 34-35 (8th Dist.)
- State v. Rose, 2008-Ohio-1262, ¶ 18
- State v. Griffin, 2014-Ohio-4767, ¶ 5
- State v. Sowell, 2016-Ohio-8025, ¶ 134
- State v. Group, 2002-Ohio-7247, ¶ 108
- State v. Shepherd, 2016-Ohio-931, ¶ 25 (8th Dist.)
- State v. McKibbon, 2002-Ohio-2041, ¶ 27 (1st Dist.)
- State v. Copeland, 2016-Ohio-1537, ¶ 28 (8th Dist.)
- State v. Madrigal, 87 Ohio St.3d 378, 396 (2000)
- State v. Gibbs, 2006-Ohio-175, ¶ 24 (8th Dist.)
- State v. Head, 2005-Ohio-3407, ¶ 31 (11th Dist.)

- State v. Patterson, 2018-Ohio-3348, ¶ 39 (1st Dist.)
- Simbo Props. v. M8 Realty, L.L.C., 2019-Ohio-4361, ¶ 26 (8th Dist.)
- State v. Nucklos, 2007-Ohio-1025, ¶ 57 (2d Dist.)
- State v. Wilborn, 2024-Ohio-5003, ¶¶ 37-38, 43-44 (8th Dist.)
- State v. Cottingham, ¶ 32 (8th Dist.)
- State v. Webb, 2025-Ohio-456, ¶ 9
- State v. Jenks, 61 Ohio St.3d 259 (1991)
- State v. Jackson, 2025-Ohio-109, ¶¶ 25, 29 (8th Dist.)
- State v. Thompkins, 78 Ohio St.3d 380, 386-387, 390 (1997)
- State v. Radano, 2017-Ohio-1034, ¶ 35 (8th Dist.)
- State v. Cassano, 2012-Ohio-4047, ¶ 13 (8th Dist.)
- State v. Crosby, 2018-Ohio-3793, ¶¶ 11-12 (8th Dist.)
- State v. McFarland, 2020-Ohio-3343, ¶¶ 27-29
- State v. Shabazz, 2014-Ohio-1828, ¶ 31 (8th Dist.)
- Rosemond v. United States, 572 U.S. 65 (2014)
- State v. Pruett, 28 Ohio App.2d 29, 34 (4th Dist. 1971)
- State v. Hughes-Davis, 2025-Ohio-3151, ¶ 24
- Eastley v. Volkman, 2012-Ohio-2179, ¶¶ 12, 20
- In re Z.C., 2023-Ohio-4703, ¶ 14
- Parma Hts. v. Brett, 2025-Ohio-4, ¶ 21 (8th Dist.)
- State v. Jones, 2025-Ohio-2866, ¶ 47
- State v. Sheline, 2019-Ohio-528, ¶ 100 (8th Dist.)
- State v. Dodson, 2025-Ohio-1733, ¶ 12
- State v. Rentas, 2024-Ohio-732, ¶ 16 (8th Dist.)
- State v. Solomon, 2021-Ohio-940, ¶ 62
- State v. Pace, 2025-Ohio-2874, ¶ 62 (10th Dist.)
- State v. Cowen, 2012-Ohio-3682, ¶ 54 (8th Dist.)
- State v. Smith, 2010-Ohio-4006, ¶ 16 (8th Dist.)