

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

Watson v. Minnich

2026-Ohio-1151 · No. 25CA18 · Decided March 20, 2026

SUMMARY

The Ohio Fourth District Court of Appeals affirmed a divorce decree dividing an e-Trade account as marital property. The court held that, because the appellant failed to provide a transcript of the final hearing, it had to presume the regularity and validity of the trial court’s proceedings.

CASE DETAILS

COURT	Court of Appeals of Ohio, Fourth Appellate District, Pickaway County
WRITING FOR THE COURT	Jason P. Smith; Hess, J.; Wilkin, J.
JURISDICTION	Ohio Court of Appeals, Fourth Appellate District, Pickaway County
DECIDED	March 20, 2026
DOCKET	25CA18
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a divorce decree and the trial court's dismissal of his objections to the magistrate's decision concerning the classification and division of an e-Trade account.
STANDARD OF REVIEW	Property-classification determinations in a divorce action are reviewed under the manifest-weight-of-the-evidence standard. A judgment will not be reversed as against the manifest weight of the evidence if supported by some competent, credible evidence. When the appellant fails to provide the transcript necessary to review the assigned error, the appellate court presumes the validity and regularity of the trial court's proceedings.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Martin Derek Minnich v. Amy Watson

TOPICS

- equitable distribution
- divorce
- appellate procedure
- standard of review
- family law procedure

PRACTICE AREAS

family law

appellate procedure

civil procedure

QUESTIONS PRESENTED

1. Whether the appellate court could review Husband's challenge to the classification and division of the e-Trade account as marital property when Husband failed to provide a transcript of the final divorce hearing.

HOLDINGS

1. Because Husband failed to provide the transcript necessary to review his claim that the trial court improperly classified and divided the e-Trade account, the appellate court was required to presume the regularity and validity of the trial court's proceedings and affirm the judgment.

KEY QUOTATIONS

“Where an appellant fails to provide the portions of the transcript required by an appellate court to resolve the assigned errors, “the appellate court has no choice but to presume the validity of the trial court's judgment and affirm.”” (¶ 17)

“Because we have no record upon which we can review Husband’s sole assignment of error, we must presume the regularity of the trial court proceeding.” (¶ 18)

FACTUAL BACKGROUND

The parties married in 2014 and had two minor children. During the divorce proceedings, Husband contended that an e-Trade account was funded with separate property or a gift connected to a partnership with his father. The magistrate and trial court classified the account as marital property and awarded Wife one-half of its value. Husband challenged that determination on appeal but did not provide a transcript of the final divorce hearing.

PROCEDURAL HISTORY

The magistrate classified the e-Trade account as marital property and awarded Wife one-half of the account. Husband objected and requested a transcript of the final hearing, but no transcript was filed. The trial court dismissed the objections for failure to file a transcript and entered the divorce decree. The appellate court affirmed because the absence of a transcript prevented review of Husband's evidentiary and property-classification challenge.

DISPOSITION

affirmed

CASES CITED

- Thompson v. Thompson, 2024-Ohio-2147, ¶¶ 32-34 (4th Dist.)
- Evans v. Evans, 2014-Ohio-4450, ¶ 26 (4th Dist.)

- *Barkley v. Barkley*, 119 Ohio App.3d 155, 159-161 (4th Dist. 1997)
- *Wright v. Wright*, 1994 WL 649271 (4th Dist. 1994)
- *C.E. Morris Co. v. Foley Constr. Co.*, 54 Ohio St. 2d 279 (1978)
- *In re Jane Doe I*, 57 Ohio St.3d 135 (1991)
- *Seasons Coal Co. v. Cleveland*, 10 Ohio St.3d 77 (1984)
- *Suppan v. Suppan*, 2018-Ohio-2569, ¶ 21 (9th Dist.)
- *Entingh v. Entingh*, 2008-Ohio-756, ¶¶ 21-22 (2d Dist.)
- *Middledorf v. Middledorf*, 1998-Ohio-403
- *Maloney v. Maloney*, 2005-Ohio-1368, ¶¶ 4-16
- *Wilson v. Wilson*, 2004-Ohio-6248 (12th Dist.), cert. denied, 105 Ohio St.3d 1470
- *Plum Run, Inc. v. Cantor*, 2003-Ohio-5545, ¶ 11 (4th Dist.)
- *Woodgeard v. Hines*, 2023-Ohio-2362, ¶ 8 (4th Dist.)
- *Am. Family Ins. Co. v. Hoop*, 2014-Ohio-3773, ¶ 36 (4th Dist.)
- *Malone v. Ford*, 2021-Ohio-330, ¶ 9 (4th Dist.)
- *State ex rel. Bardwell v. Cuyahoga Cty. Bd. of Commrs.*, 2010-Ohio-5073, ¶ 14
- *Pryor v. Pryor*, 2009-Ohio-6670, ¶ 25 (4th Dist.)