

OHIO FIRST DISTRICT COURT OF APPEALS

State v. Estill

2026-Ohio-2101 · No. C-250565 · Decided June 5, 2026

SUMMARY

The Ohio First District Court of Appeals affirmed Adreyanna Estill’s conviction for first-degree-misdemeanor telecommunications harassment. The court rejected challenges concerning unnotified other-acts evidence, hearsay testimony regarding a computer database search, photographic duplicates of text-message screenshots, ineffective assistance of counsel, and the sufficiency and manifest weight of the evidence.

CASE DETAILS

COURT	Ohio First District Court of Appeals
WRITING FOR THE COURT	Kinsley, Presiding Judge; Crouse, Judge; Bock, Judge
JURISDICTION	Ohio First District Court of Appeals, Hamilton County
DECIDED	June 5, 2026
DOCKET	C-250565
DISPOSITION	affirmed
PROCEDURAL POSTURE	Adreyanna Estill appealed her conviction for first-degree-misdemeanor telecommunications harassment following a bench trial in the Hamilton County Municipal Court.
STANDARD OF REVIEW	Unpreserved evidentiary errors are reviewed for plain error; preserved evidentiary rulings are reviewed for abuse of discretion, followed by harmless-error review where appropriate. Sufficiency is reviewed by asking whether, viewing the evidence most favorably to the prosecution, any rational trier of fact could find the essential elements proven beyond a reasonable doubt. Manifest weight is reviewed independently, with reversal warranted only in the exceptional case where the evidence weighs heavily against the conviction. Ineffective-assistance claims are governed by the Strickland two-prong test.
PRECEDENTIAL VALUE	Published Ohio First District Court of Appeals opinion
PARTIES	Adreyanna Estill v. State of Ohio

TOPICS

evidence

hearsay

best evidence rule

ineffective assistance

standard of review

PRACTICE AREAS

Criminal law

Criminal procedure

Evidence

Appellate practice

QUESTIONS PRESENTED

1. Whether the trial court plainly erred by admitting other-acts testimony without the notice required by Evid.R. 404(B)(2).
2. Whether the trial court plainly erred by admitting hearsay testimony concerning the results of a law-enforcement computer inquiry.
3. Whether the trial court abused its discretion by admitting photographs of screenshots of text messages under the best-evidence rules.
4. Whether trial counsel rendered ineffective assistance by failing to object to the other-acts and hearsay evidence.
5. Whether sufficient evidence supported Estill's identity as the sender and her purpose to abuse, threaten, or harass A.S.
6. Whether the conviction was against the manifest weight of the evidence.

HOLDINGS

1. The trial court did not commit plain error by admitting testimony about Estill's prior Facebook messages because failure to provide Evid.R. 404(B)(2) notice is not an automatic basis for exclusion, and the record contained no evidence of bad faith.
2. The admission of testimony that an Axon computer inquiry linked Estill to the sending phone number did not constitute plain error because the record did not affirmatively show that the bench-trial court considered the hearsay in reaching its verdict.
3. The trial court did not abuse its discretion by admitting photographs of screenshots of the text messages because the photographs were duplicates admissible under Evid.R. 1003, and Estill did not show either an authenticity question or unfairness.
4. Estill failed to establish ineffective assistance because she did not show that objections to the other-acts evidence or hearsay testimony would have changed the evidentiary ruling or the outcome of the trial.
5. The conviction for telecommunications harassment was supported by sufficient evidence and was not against the manifest weight of the evidence.

KEY QUOTATIONS

“The failure to provide the notice required by Evid.R. 404(B)(2) is not automatic grounds for excluding “other acts” evidence at trial.” (¶ 18)

“In a bench trial, “we presume that the trial court did not consider improper evidence in reaching its verdict. Rather, we presume that the court considered only relevant, material and competent evidence unless the

record affirmatively discloses otherwise.”” (§ 22)

“Evid.R. 1003 allows duplicates to be admissible “to the same extent as an original unless (1) a genuine question is raised as to the authenticity of the original or (2) in the circumstances it would be unfair to admit the duplicate.”” (§ 25)

“To succeed on an ineffective assistance of counsel claim, Estill must show that “(1) trial counsel’s performance was deficient, and (2) the deficient performance deprived [Estill] of a fair trial.”” (§ 31)

“To assess whether a conviction is supported by sufficient evidence, we ask “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.”” (§ 37)

FACTUAL BACKGROUND

A.S., who was approximately seven-and-a-half months pregnant, received threatening text messages from an unknown number on June 9, 2025, including statements that her baby might not live and that the sender would bring violence. A.S. had previously received threatening and harassing Facebook messages from Estill concerning the same man and had blocked Estill. A.S. identified photographs of screenshots of the messages, and a police officer testified that an Axon search linked the sending number to Estill. The trial court convicted Estill after a bench trial.

PROCEDURAL HISTORY

The Hamilton County Municipal Court convicted Estill of telecommunications harassment under R.C. 2917.21 after a bench trial and sentenced her to 180 days in jail, suspended, one year of probation, and court costs. On appeal, Estill challenged the admission of other-acts evidence, hearsay, and duplicate text-message photographs; alleged ineffective assistance of counsel; and contested the sufficiency and manifest weight of the evidence. The First District Court of Appeals overruled all assignments of error and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Browner, 2024-Ohio-1547, ¶ 8 (1st Dist.)
- State v. Sowders, 2023-Ohio-4498, ¶ 11 (1st Dist.)
- State v. Long, 53 Ohio St. 2d 91 (1978), paragraph three of the syllabus
- State v. Fritsch, 2023-Ohio-2676, ¶ 10 (1st Dist.)
- State v. Morris, 2012-Ohio-2407, ¶ 19
- State v. Jones, State v. Jones, 2020-Ohio-3051, ¶ 18 (1st Dist.)
- State v. Perry, 2004-Ohio-297, ¶ 15
- State v. Akins, 2024-Ohio-1491, ¶¶ 28, 45 (1st Dist.)
- State v. Grubbs, 2025-Ohio-1384, ¶¶ 39-41 (1st Dist.)

- State v. Binks, 2018-Ohio-1570, ¶ 48 (12th Dist.)
- State v. Justice, 2024-Ohio-2574, ¶ 22 (1st Dist.)
- State v. Neal, 2022-Ohio-1290, ¶ 31 (1st Dist.)
- State v. Mead, 2021-Ohio-1107, ¶¶ 32, 34 (1st Dist.)
- State v. Searles, 2019-Ohio-3109, ¶ 7 (1st Dist.)
- Marder v. Marder, 2008-Ohio-2500, ¶ 50 (12th Dist.)
- State v. Tibbetts, 92 Ohio St. 3d 146, 160 (2001)
- State v. Hackney, 2016-Ohio-4609, ¶¶ 36, 39 (1st Dist.)
- Strickland v. Washington, 466 U.S. 668, 687 (1984)
- State v. Bradley, 42 Ohio St. 3d 136, 143 (1989)
- State v. Cephas, 2019-Ohio-52, ¶ 34 (1st Dist.)
- State v. Smith, 2025-Ohio-3131, ¶ 54 (1st Dist.)
- State v. Jenks, 61 Ohio St. 3d 259 (1991), paragraph two of the syllabus
- State v. Gurung, 2024-Ohio-3202, ¶ 19 (1st Dist.)
- State v. Powell, 2020-Ohio-4283, ¶¶ 16-19 (1st Dist.)
- State v. Thompkins, 78 Ohio St. 3d 380, 388 (1997)
- State v. Glover, 2019-Ohio-5211, ¶ 30 (1st Dist.)
- Barberton v. Jenney, 2010-Ohio-2420, ¶ 20
- State v. Martin, 20 Ohio App. 3d 172, 175 (1st Dist. 1983)
- State v. Gibson, 2008-Ohio-410, ¶ 8 (9th Dist.)
- State v. Lewis, 2019-Ohio-4081, ¶ 20 (7th Dist.)
- State v. Kelly, 2024-Ohio-1864, ¶ 31 (1st Dist.)
- State v. Brewer, 2009-Ohio-593, ¶¶ 17-20
- State v. January, 2021-Ohio-3364, ¶ 9 (1st Dist.)
- State v. Harshbarger, 2010-Ohio-4413, ¶ 19 (3d Dist.)