

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT, DELAWARE
COUNTY

State v. Anderson

2026-Ohio-425 · No. 24 CAA 12 0110 · Decided February 9, 2026

SUMMARY

The Fifth District Court of Appeals of Ohio affirmed Rayshawn Anderson's convictions and aggregate sentence arising from the shooting death of Alonzo Byrd. The court rejected challenges based on manifest weight of the evidence and self-defense, an alleged Brady violation, admission of other-acts evidence under Evid.R. 404(B), and alleged prosecutorial misconduct concerning post-Miranda silence.

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District, Delaware County
WRITING FOR THE COURT	Andrew J. King, P.J.; Robert G. Montgomery, J.; Kevin W. Popham, J.
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District, Delaware County
DECIDED	February 9, 2026
DOCKET	24 CAA 12 0110
DISPOSITION	affirmed
PROCEDURAL POSTURE	Anderson appealed his convictions and aggregate sentence from the Delaware County Court of Common Pleas after a jury trial.
STANDARD OF REVIEW	Manifest weight of the evidence for the self-defense challenge; de novo review for admissibility of Evid.R. 404(B) evidence; abuse of discretion for a mistrial determination; plain-error review where no mistrial was requested; and prejudice-based review for prosecutorial misconduct.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Rayshawn Lamont Anderson v. State of Ohio

TOPICS

- self defense
- criminal procedure
- evidence
- prosecutorial misconduct
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Anderson's murder convictions were against the manifest weight of the evidence because the State failed to disprove his claim of self-defense.
2. Whether the State violated due process under *Brady v. Maryland* by failing to obtain or preserve the names of juveniles who were present when Anderson made an allegedly incriminating statement in custody.
3. Whether the trial court improperly admitted evidence of Anderson's prior assault and property damage under Ohio Evid.R. 404(B).
4. Whether the trial court erred by failing to declare a mistrial, and whether the prosecutor committed misconduct, based on questioning concerning Anderson's post-Miranda silence.

HOLDINGS

1. The convictions for murder were not against the manifest weight of the evidence because the State presented evidence disproving at least one required element of self-defense beyond a reasonable doubt, including that Anderson was at fault in creating the situation and used more force than necessary.
2. Anderson did not establish a *Brady* violation because the information concerning the conversation and the other juveniles was known to him before trial and was not post-trial-discovered information withheld by the State.
3. The trial court properly admitted evidence concerning Anderson's prior assault, property damage, feud with the residents, and no-contact order because the evidence was relevant to a permissible non-character purpose, including motive and prior calculation and design, and its probative value was not substantially outweighed by unfair prejudice.
4. The trial court did not plainly err by failing to declare a mistrial sua sponte, and the prosecutor's questioning did not warrant reversal because any impropriety was cured by the court's limiting instruction and did not prejudice Anderson.

KEY QUOTATIONS

“whether in resolving conflicts in the evidence, the jury clearly lost its way and created such a manifest miscarriage of justice that the conviction must be reversed and a new trial ordered.” (§ 27)

“In order to be admissible, (1) the evidence must be relevant, (2) the evidence cannot be presented to prove a person's character to show conduct in conformity therewith but must instead be presented for a legitimate other purpose, and (3) the probative value of the evidence cannot be substantially outweighed by the danger of unfair prejudice.” (§ 45)

FACTUAL BACKGROUND

Seventeen-year-old Anderson went to a Delaware, Ohio residence despite an interim juvenile-court order requiring him to avoid contact with one of the residents. After the homeowner, Alonzo Byrd, told Anderson to

leave, Anderson shot Byrd five times and fled; Byrd died at the scene. Anderson claimed self-defense, asserting that Byrd reached toward his waistband, but witnesses testified Byrd's hands held papers and a tumbler, and no weapon was found near him. The trial also included evidence of an earlier feud and assault involving residents of the home, Anderson's statement while detained, and his post-arrest telephone calls discussing self-defense.

PROCEDURAL HISTORY

Following bind-over proceedings in juvenile court, a grand jury indicted Anderson on aggravated murder, murder, felony murder, discharge of a firearm on or near prohibited premises, and tampering with evidence, with firearm specifications on the first four counts. The State dismissed the tampering count before trial. After a seven-day jury trial, Anderson was acquitted of aggravated murder but convicted of the remaining charges and sentenced to 27 years to life. The Ohio Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Messenger, 2022-Ohio-4562
- State v. Martin, 20 Ohio App.3d 172, 175 (1st Dist. 1983)
- State v. Thompkins, 78 Ohio St.3d 380 (1997)
- State v. Gatewood, 2021-Ohio-3325, ¶ 68 (1st Dist.)
- State v. Jackson, 22 Ohio St.3d 281, 284 (1986)
- State v. Staats, 2021-Ohio-1325, ¶ 28 (5th Dist.)
- State v. Walker, 2021-Ohio-2037, ¶ 19 (8th Dist.)
- Brady v. Maryland, 373 U.S. 83 (1963)
- In re P.K., 2019-Ohio-2311, ¶ 11 (5th Dist.)
- Cone v. Bell, 556 U.S. 449, 469-470 (2009)
- United States v. Agurs, 427 U.S. 97, 103 (1976)
- State v. Wickline, 50 Ohio St.3d 114, 116 (1990)
- State v. Williams, 2012-Ohio-5695, ¶¶ 17, 20
- State v. Hartman, 2020-Ohio-4440, ¶¶ 20, 22, 25
- State v. Cooper, 2002-Ohio-617, ¶ 57 (12th Dist.)
- State v. Skatzes, 2004-Ohio-6391, ¶ 113
- State v. Loza, 71 Ohio St.3d 61, 75 (1994)
- State v. Trimble, 122 Ohio St.3d 2009-Ohio-2961
- Huffman v. Hair Surgeon, Inc., 19 Ohio St.3d 83, 87 (1985)
- AAAA Ent., Inc. v. River Place Community Urban Redev. Corp., 50 Ohio St.3d 157, 161 (1990)
- State v. Lott, 51 Ohio St.3d 160 (1990)
- Darden v. Wainwright, 477 U.S. 168 (1986)

- State v. Taylor, 1999 Ohio App. LEXIS 397 (9th Dist.)
- Kremer v. Cox, 114 Ohio App.3d 41, 60 (9th Dist. 1996)
- Albrechtsen v. Bd. of Regents, 309 F.3d 433 (7th Cir. 2002)
- United States v. Dunkel, 927 F.2d 955, 956 (7th Cir. 1991)
- Cleveland v. Walters, 98 Ohio App.3d 165, 168 (8th Dist. 1994)
- State v. Jones, 115 Ohio App.3d 204, 207 (7th Dist. 1996)
- State v. West, 2022-Ohio-1556, ¶ 22

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