

SUPREME COURT OF OHIO

State v. Reed

2026-Ohio-1174 · No. 2024-0522 · Decided April 3, 2026

SUMMARY

The Supreme Court of Ohio held that offenses involving the sexual abuse of four minor victims were properly joined under Crim.R. 8(A) because they were of the same or similar character. It further held that the defendant failed to establish prejudice under Crim.R. 14 because the evidence was simple and direct, and therefore the trial court did not abuse its discretion in denying severance. The court reversed the Fifth District Court of Appeals and reinstated the trial court's judgment and sentence.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	DeWine, J.; Kennedy, C.J.; Fischer, J.; Deters, J.; Hawkins, J.; Shanahan, J.
JURISDICTION	Supreme Court of Ohio
DECIDED	April 3, 2026
DOCKET	2024-0522
DISPOSITION	reversed
PROCEDURAL POSTURE	The State of Ohio appealed the Fifth District Court of Appeals' judgment holding that the trial court abused its discretion by denying Reed's motion to sever 22 criminal counts involving four victims, vacating Reed's no-contest plea, and reversing the trial court's judgment. The Supreme Court of Ohio reversed and reinstated the trial court's judgment and sentence.
STANDARD OF REVIEW	A trial court's decision denying severance under Crim.R. 14 is reviewed for abuse of discretion, meaning conduct that is unreasonable, arbitrary, or unconscionable. A defendant challenging the denial bears a heavy burden and must affirmatively demonstrate prejudice, that sufficient information was provided for the trial court to weigh joinder against the right to a fair trial, and that the trial court abused its discretion.
PRECEDENTIAL VALUE	published
PARTIES	State of Ohio v. Jeremy Reed

TOPICS

criminal procedure

evidence

appellate procedure

standard of review

preservation of error

PRACTICE AREAS

criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the offenses involving four minor victims were properly joined under Crim.R. 8(A) because they were of the same or similar character.
2. Whether Reed affirmatively demonstrated prejudice from joinder under Crim.R. 14.
3. Whether the trial court abused its discretion by finding that the evidence was simple and direct and denying severance.
4. Whether the State's challenge to the Fifth District's en banc voting procedure should be reached.

HOLDINGS

1. The charges were properly joined because all involved sex crimes allegedly committed by Reed against minor victims while he was in a relationship with their mother or grandmother, making the offenses of the same or similar character.
2. Reed failed to affirmatively demonstrate that joinder prejudiced his rights because his motion supplied insufficient case-specific information for the trial court to weigh the considerations favoring joinder against his right to a fair trial.
3. Severance was not required because the evidence was simple and direct and the jury could reasonably segregate the proof concerning each offense.
4. The court declined to reach the en banc voting-procedure issue because its decision on severance rendered that issue moot and any ruling would be advisory.

KEY QUOTATIONS

“The State need only show that one of these tests is met to overcome a defendant’s claim of prejudice under Crim.R. 14.” (¶ 22)

“In applying the simple-and-direct test, the inquiry is on whether the evidence of each offense is separate and direct, whether the evidence is uncomplicated, and whether the jury is likely to be confused.” (¶ 31)

“Based on the limited information provided to the trial court, we conclude that the trial court did not abuse its discretion in determining that joinder was not prejudicial because the evidence was simple and direct.” (¶ 37)

FACTUAL BACKGROUND

Reed was charged with 22 sex-related offenses involving four young girls, with alleged conduct occurring between 2003 and 2020. The charges involved distinct alleged incidents and time periods, and Reed was alleged

to have been romantically involved with the mother or grandmother of each victim. Before trial, Reed moved to sever the charges into four separate trials, but he provided few case-specific facts or theories of prejudice and later pleaded no contest to four amended charges.

PROCEDURAL HISTORY

Reed was indicted on 22 counts involving alleged sexual offenses against four minor victims. The trial court denied his motion to sever, after which he pleaded no contest to two amended rape counts and two gross-sexual-imposition counts; the remaining charges were dismissed, and he received an aggregate prison term of 28 to 33 years. The Fifth District reversed and vacated the plea, concluding that joinder was prejudicial. The Supreme Court of Ohio reversed the appellate judgment and reinstated the trial court's judgment and sentence.

DISPOSITION

reversed

REMAND INSTRUCTIONS

The court reinstated the trial court's judgment and sentence; no further remand instructions were stated.

CASES CITED

- State v. Torres, 66 Ohio St.2d 340, 343-344 (1981)
- State v. Schaim, 1992-Ohio-31
- State v. Lott, 51 Ohio St.3d 160, 163 (1990)
- State v. Roberts, 62 Ohio St.2d 170, 175 (1980)
- State v. Beasley, 2018-Ohio-16, ¶ 12
- State v. Ford, 2019-Ohio-4539, ¶ 106
- State v. Coley, 2001-Ohio-1340, ¶ 41
- State v. Brooks, 44 Ohio St.3d 185, 193 (1989)
- State v. Wiles, 59 Ohio St.3d 71, 77 (1991)
- State v. Strobel, 51 Ohio App.3d 31, 32-33 (3d Dist. 1988)
- State v. Loza, 71 Ohio St.3d 61, 75 (1994)
- State v. Meeks, 2015-Ohio-1527, ¶ 99
- State v. Clinton, 2017-Ohio-9423, ¶¶ 3, 42, 48
- State v. Dean, 2015-Ohio-4347, ¶¶ 58, 64
- State v. Ashcraft, 2009-Ohio-5281, ¶ 19
- United States v. Gooch, 665 F.3d 1318, 1337 (D.C. Cir. 2012)
- Drew v. United States, 331 F.2d 85, 91 (D.C. Cir. 1964)
- United States v. Lotsch, 102 F.2d 35, 36 (2d Cir. 1939)
- Oppen v. United States, 348 U.S. 84, 95 (1954)
- Fortner v. Thomas, 22 Ohio St.2d 13, 14 (1970)

- State v. Hartman, 2020-Ohio-4440, ¶¶ 23, 27, 46
- State v. Frazier, 2004-Ohio-1121, ¶ 18
- State v. Short, 2015-Ohio-3183, ¶ 49
- State v. Slaven, 2010-Ohio-6400, ¶ 33

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