

COURT OF APPEALS OF OHIO, SECOND APPELLATE DISTRICT, CLARK COUNTY

State v. Doucette

2026-Ohio-2426 · No. 2025-CA-67 · Decided June 26, 2026

SUMMARY

The Ohio Second District Court of Appeals affirmed Blake Doucette’s convictions and sentence following his guilty plea to failure to comply with an order or signal of a police officer. The court held that the 25-year driver’s license suspension fell within the statutory range and that the maximum 60-month prison sentence was not contrary to law. The court also concluded that the trial court adequately considered the purposes and principles of felony sentencing under R.C. 2929.11 and the factors under R.C. 2929.12.

CASE DETAILS

COURT	Court of Appeals of Ohio, Second Appellate District, Clark County
WRITING FOR THE COURT	Ronald C. Lewis, Presiding Judge; Huffman, Judge; Hanseman, Judge
JURISDICTION	Ohio Court of Appeals, Second Appellate District, Clark County
DECIDED	June 26, 2026
DOCKET	2025-CA-67
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a judgment of conviction and sentence entered after he pleaded guilty to third-degree-felony failure to comply with an order or signal of a police officer.
STANDARD OF REVIEW	Under Ohio Revised Code § 2953.08(G)(2), an appellate court may increase, reduce, modify, or vacate and remand a felony sentence only if it clearly and convincingly finds that the record does not support specified findings or that the sentence is otherwise contrary to law.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Blake Doucette v. State of Ohio

TOPICS

- sentencing
- standard of review
- appellate procedure
- criminal procedure

PRACTICE AREAS

criminal law

criminal sentencing

appellate practice

QUESTIONS PRESENTED

1. Whether the trial court's 25-year driver's-license suspension was clearly and convincingly contrary to law because the court allegedly failed to articulate a sufficient rationale.
2. Whether the trial court's maximum 60-month prison sentence, considered together with the 25-year license suspension, violated the minimum-sanctions principle in Ohio Revised Code § 2929.11(A) or was otherwise clearly and convincingly contrary to law.

HOLDINGS

1. The 25-year driver's-license suspension was not clearly and convincingly contrary to law because it fell within the authorized statutory range and the trial court stated that it had considered the purposes and principles of sentencing under Ohio Revised Code § 2929.11 and the factors under § 2929.12.
2. The maximum 60-month prison sentence was not clearly and convincingly contrary to law. The sentence was within the authorized statutory range, and the record demonstrated that the trial court considered Ohio Revised Code §§ 2929.11 and 2929.12; the court was not required to make additional findings or explain why it selected the maximum term.

KEY QUOTATIONS

“Under this statute, an appellate court may increase, reduce, or otherwise modify a sentence, or it may vacate the sentence and remand for resentencing, only if it “clearly and convincingly” finds either: (1) that the record does not support certain specified findings or (2) that the sentence imposed is otherwise contrary to law.” (¶ 7)

“The trial court has full discretion to impose any sentence within the authorized statutory range, and the court is not required to make any findings or give its reasons for imposing maximum or more than minimum sentences.” (¶ 14)

FACTUAL BACKGROUND

Doucette drove a stolen vehicle at high speeds during a police pursuit, including through a school zone and construction zone, while driving recklessly and eventually crashing into another vehicle. He pleaded guilty to third-degree-felony failure to comply with an order or signal of a police officer, and the State dismissed the receiving-stolen-property charge. The trial court imposed the maximum 60-month prison term and a 25-year driver's-license suspension, citing Doucette's criminal history, prior prison terms, community-control violations, and high risk-assessment score.

PROCEDURAL HISTORY

A Clark County grand jury indicted Doucette for failure to comply with a police officer's order or signal and receiving stolen property. Doucette pleaded guilty to the failure-to-comply count, the receiving-stolen-property count was dismissed, and the trial court imposed a 60-month prison sentence and a 25-year driver's-license

suspension. Doucette timely appealed, challenging the license suspension and maximum prison term as contrary to law.

DISPOSITION

affirmed

CASES CITED

- State v. Marcum, 2016-Ohio-1002, ¶ 22
- State v. Bartley, 2023-Ohio-2325, ¶ 9 (2d Dist.)
- State v. Dorsey, 2021-Ohio-76, ¶ 18 (2d Dist.)
- State v. Frazier, 2015-Ohio-344, ¶ 10 (2d Dist.)
- State v. Rodeffer, 2013-Ohio-5759, ¶ 32 (2d Dist.)
- State v. King, 2013-Ohio-2021, ¶ 45 (2d Dist.)
- State v. Foster, 2006-Ohio-856, paragraph seven of the syllabus
- State v. Benedict, 2021-Ohio-966, ¶ 8 (2d Dist.)
- State v. Trent, 2021-Ohio-3698, ¶ 15 (2d Dist.)