

COURT OF APPEALS OF OHIO, ELEVENTH APPELLATE DISTRICT,
TRUMBULL COUNTY

State of Ohio v. Ashley Crislip

State v. Crislip, 2026-Ohio-789 · No. 2025-T-0046 · Decided March 9, 2026

SUMMARY

The Eleventh District Court of Appeals of Ohio affirmed Ashley Crislip’s 36-month prison sentence following her guilty pleas to multiple drug-trafficking and drug-possession offenses. The court held that the sentence was within the statutory range, that the trial court properly considered the relevant sentencing factors, and that post-sentencing remarks did not establish bias or improper reliance on personal considerations. The court also rejected claims that bond revocation coerced the plea, that the sentence was vindictive, or that the trial judge’s alleged conflict required appellate relief.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eleventh Appellate District, Trumbull County
WRITING FOR THE COURT	Eugene A. Lucci, J.; Matt Lynch, P.J.; Robert J. Patton, J.
JURISDICTION	Court of Appeals of Ohio, Eleventh Appellate District, Trumbull County
DECIDED	March 9, 2026
DOCKET	2025-T-0046
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a judgment of the Trumbull County Court of Common Pleas imposing an aggregate 36-month prison sentence after she pleaded guilty to an amended indictment charging multiple felony drug offenses.
STANDARD OF REVIEW	Felony sentences are reviewed under R.C. 2953.08(G)(2), under which an appellate court may modify or vacate a sentence only if it clearly and convincingly finds that the record does not support specified statutory findings or that the sentence is otherwise contrary to law. An appellate court may not independently weigh the evidence under R.C. 2929.11 and R.C. 2929.12 or substitute its judgment for the trial court's.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion

PARTIES

Ashley Crislip, a.k.a. Ashley Winters v. State of Ohio

TOPICS

sentencing

criminal procedure

appellate procedure

due process

appellate jurisdiction

PRACTICE AREAS

criminal law

criminal procedure

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constitutional law

QUESTIONS PRESENTED

1. Whether the 36-month felony sentence was contrary to law because the trial court allegedly considered improper personal or speculative factors and failed to properly weigh mitigating and rehabilitation evidence under R.C. 2929.11 and R.C. 2929.12.
2. Whether the trial court violated due process by allegedly threatening to revoke Crislip's bond regardless of whether she pleaded guilty or proceeded to trial, thereby predetermining imprisonment or acting vindictively.
3. Whether the trial court violated due process and Crislip's right to an impartial tribunal by failing to inquire into or recuse itself based on a potential prior attorney-client relationship.
4. Whether the appellate court had jurisdiction to review the trial court's refusal to recuse or disqualify itself.

HOLDINGS

1. The sentence was not contrary to law because it fell within the statutory range and the trial court stated that it had considered the purposes and principles of felony sentencing and the relevant seriousness and recidivism factors. The appellate court could not independently reweigh those factors or determine whether the record supported the individual sentence under R.C. 2929.11 and R.C. 2929.12.
2. The trial court's comments did not establish a due-process violation or bias because they were made after sentence was imposed and therefore were not shown to have caused or formed the basis for the sentence. Personal experience may inform a judge's sentencing judgment so long as the decision is constitutionally guided and not wholly arbitrary or irrelevant.
3. The record did not show that the trial court compelled Crislip to plead guilty through a threat to revoke bond or predetermined a prison sentence. Although the court initially stated that bond would be revoked either way, it indicated that the issue would be revisited if Crislip proceeded to trial, afforded her opportunities to consult counsel, and ultimately accepted her voluntary plea.
4. The appellate court lacked jurisdiction to review the disqualification or recusal of a common pleas judge. R.C. 2701.03 provides the exclusive means to assert that a common pleas judge is biased or prejudiced, and Crislip filed neither a formal motion to recuse nor an affidavit of disqualification. In any event, the record did not establish that the sentence was imposed to punish her for exercising a constitutional right.

KEY QUOTATIONS

“Nothing in R.C. 2953.08(G)(2) permits an appellate court to independently weigh the evidence in the record and substitute its judgment for that of the trial court concerning the sentence that best reflects compliance with R.C. 2929.11 and 2929.12.” (¶ 11)

“We therefore hold there was no indication of compulsion by threat of bond revocation in this matter.” (¶ 32)

“Thus, an appellate court clearly lacks any authority to pass upon the disqualification of a common pleas court judge or to void the judgment of a trial court on that basis.” (¶ 41)

FACTUAL BACKGROUND

Crislip pleaded guilty to multiple felony drug-trafficking and drug-possession offenses arising from controlled sales of cocaine and fentanyl-related substances near Warren G. Harding High School and a later search of her residence. The search recovered fentanyl, heroin, cocaine, cash, and firearms. The trial court ordered concurrent terms totaling 36 months after considering the record, statements, presentence investigation report, victim-impact statements, and the statutory purposes, principles, seriousness factors, and recidivism factors. During plea and sentencing proceedings, the court discussed bond revocation, made post-sentencing comments about the offenses, and declined to recuse itself after defense counsel raised a possible prior representation of a person allegedly connected to the case.

PROCEDURAL HISTORY

Crislip pleaded guilty to an amended indictment charging felony trafficking and possession offenses, including a forfeiture specification. After a plea colloquy, the trial court ordered a presentence investigation and then imposed concurrent prison terms totaling 36 months. Crislip appealed, asserting sentencing error, due-process violations based on bond and alleged judicial vindictiveness, and failure to address a potential judicial conflict. The Eleventh District Court of Appeals rejected all four assignments of error and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Lamb, 2023-Ohio-2834, ¶¶ 9-10 (11th Dist.)
- State v. Gwynne, 2023-Ohio-3851, ¶ 15
- State v. Shannon, 2021-Ohio-789, ¶¶ 11, 17 (11th Dist.)
- State v. Brown, 2017-Ohio-8416, ¶ 74 (2d Dist.)
- State v. Clinton, 2017-Ohio-9423, ¶ 243
- State v. Smith, 2014-Ohio-1520, ¶ 14 (8th Dist.)
- State v. Jones, 2014-Ohio-29, ¶ 13 (8th Dist.)
- State v. Orr, 2024-Ohio-4707, ¶ 12 (2d Dist.)
- State v. Gibbs, 2022-Ohio-4792, ¶¶ 60-61 (11th Dist.)

- State v. Little, 2024-Ohio-5375, ¶ 12 (11th Dist.)
- State v. Gause, 2024-Ohio-372, ¶ 14 (5th Dist.)
- State v. Spahr, 2009-Ohio-4609, ¶ 34 (2d Dist.)
- State v. Cook, 65 Ohio St.3d 516, 529 (1992)
- Barclay v. Florida, 463 U.S. 939, 950-951 (1983)
- State v. Arnett, 2000-Ohio-302, ¶¶ 30-31
- State v. Johnson, 2019-Ohio-4668, ¶ 26 (8th Dist.)
- State v. Frazier, 2017-Ohio-8307, ¶ 15 (8th Dist.)
- State v. Power, 2013-Ohio-4254, ¶ 22 (7th Dist.)
- State v. Karpovitch, 2025-Ohio-4323, ¶ 23 (11th Dist.)
- State v. Sharp, 2020-Ohio-3497, ¶ 11 (12th Dist.)
- State v. Hay, 2005-Ohio-3443, ¶ 6 (3d Dist.)
- Machibroda v. United States, 360 F. Supp. 780 (N.D. Ohio 1973)
- State v. Sankey, 2018-Ohio-2677, ¶¶ 15-16 (11th Dist.)
- State v. Osie, 2014-Ohio-2966, ¶¶ 62, 64-65
- Peterman v. Stewart, 2008-Ohio-2164, ¶ 46 (5th Dist.)
- State ex rel. Hough v. Saffold, 2012-Ohio-28, ¶¶ 1-2
- Beer v. Griffith, 54 Ohio St.2d 440, 441-442 (1978)
- State v. Moore, 2001-Ohio-1892, ¶ 4
- State v. Hale, 2008-Ohio-3426, ¶ 78
- Bordenkircher v. Hayes, 434 U.S. 357, 363 (1978)
- United States v. Goodwin, 457 U.S. 368, 372 (1982)
- North Carolina v. Pearce, 395 U.S. 711, 724-725 (1969)