

COURT OF APPEALS OF OHIO, FIRST APPELLATE DISTRICT, HAMILTON COUNTY

In re K.J.

2026-Ohio-2169 (Ohio Ct. App. 1st Dist. 2026) · No. C-250488, C-250489, C-250490, C-250491 · Decided June 10, 2026

SUMMARY

The First District Court of Appeals of Ohio reversed and remanded juvenile delinquency judgments because the juvenile court failed to determine whether the initial police encounter was supported by reasonable suspicion and failed to make necessary credibility findings regarding the officer's jaywalking observations. The court held that the suppression issue required further factual findings, while concluding that sufficient evidence supported the adjudications for carrying a concealed weapon, tampering with evidence, and obstructing official business. The manifest-weight challenge to the jaywalking adjudication was deemed moot.

CASE DETAILS

COURT	Court of Appeals of Ohio, First Appellate District, Hamilton County
WRITING FOR THE COURT	Kinsley, Presiding Judge; Crouse, Judge; Bock, Judge
JURISDICTION	Ohio Court of Appeals, First Appellate District, Hamilton County
DECIDED	June 10, 2026
DOCKET	C-250488, C-250489, C-250490, C-250491
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	K.J. appealed juvenile delinquency adjudications for obstructing official business, carrying a concealed weapon, and tampering with evidence, as well as a juvenile traffic-offender adjudication for jaywalking. He challenged the denial of his motion to suppress and the sufficiency and weight of the evidence.
STANDARD OF REVIEW	Suppression rulings present mixed questions of law and fact: legal conclusions are reviewed de novo, while factual findings supported by competent and credible evidence are accepted. Sufficiency of the evidence is reviewed by asking whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements proven beyond a reasonable doubt.
PRECEDENTIAL VALUE	published

TOPICS

suppression of evidence

search and seizure

reasonable doubt

appellate procedure

standard of review

PRACTICE AREAS

criminal procedure

juvenile law

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the juvenile court erred in denying K.J.'s motion to suppress without determining whether the initial investigatory stop was supported by reasonable suspicion and without resolving the credibility of the officer whose jaywalking observation supplied the basis for the stop.
2. Whether sufficient evidence supported K.J.'s delinquency adjudications for carrying a concealed weapon, tampering with evidence, and obstructing official business.
3. Whether K.J.'s jaywalking adjudication was against the manifest weight of the evidence.

HOLDINGS

1. The juvenile court erred by denying the suppression motion without determining whether the initial investigatory stop was lawful and whether the officer's testimony about the alleged jaywalking was credible. Because those findings were necessary to determine reasonable suspicion, the suppression ruling had to be reversed and remanded.
2. Running from police constitutes obstruction only when the initial investigatory stop was lawful; officers have probable cause to arrest a fleeing suspect for obstruction if the initial stop was supported by reasonable suspicion and was lawful.
3. Sufficient evidence supported the adjudication because, viewed in the light most favorable to the State, the circumstances permitted a reasonable factfinder to infer that K.J. possessed a concealed handgun in his crossbody bag and then hid it in the apartment closet.
4. Sufficient evidence supported the tampering adjudication because the evidence permitted an inference that K.J. knew of an ongoing or likely firearm investigation and concealed the gun in the closet to impair its availability as evidence.
5. Sufficient evidence supported the obstruction adjudication because the State presented evidence that the officer acted lawfully in attempting to stop K.J. to investigate the alleged jaywalking and that K.J. affirmatively impeded the officer by fleeing.

KEY QUOTATIONS

"Because the credibility of witnesses is a matter for the juvenile court to resolve in the first instance, we remand the matter so the court below can resolve that foundational issue." (§ 2)

"It is true that, as a matter of law, running from a lawful investigatory stop constitutes obstruction." (§ 26)

“We accordingly reverse the juvenile court’s denial of K.J.’s motion to suppress.” (¶ 33)

“Because we lack the factual findings required to review the juvenile court’s denial of the motion, we reverse the juvenile court’s judgments and remand the matter for the juvenile court to make the necessary findings as to K.J.’s suppression motion.” (¶ 53)

FACTUAL BACKGROUND

Police officers investigating ShotSpotter alerts received information that K.J. and two other youths had jaywalked and approached the youths to investigate. K.J. ran from the officers and entered an apartment; police later found a loaded operable handgun hidden in a closet and the crossbody bag K.J. had been wearing on a bed. After his arrest, K.J. admitted that someone had given him a gun but said he did not remember where he hid it.

PROCEDURAL HISTORY

The Hamilton County Juvenile Court denied K.J.’s motion to suppress, adjudicated him delinquent on three offenses, and adjudicated him a juvenile traffic offender for jaywalking. The juvenile court then imposed dispositions, including suspended commitment to the Ohio Department of Youth Services for carrying a concealed weapon and tampering with evidence. The First District reversed the suppression ruling because the juvenile court failed to determine whether the initial investigatory stop was lawful and whether the officer’s jaywalking testimony was credible, and remanded for those findings. The court declined to reach the moot manifest-weight challenge but held that sufficient evidence supported the three delinquency adjudications.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Hamilton County Juvenile Court must determine whether the initial investigatory stop was lawful, including whether the officer who observed the alleged jaywalking testified credibly and whether that information supplied reasonable suspicion. After resolving the suppression motion, the State may proceed with further adjudicatory proceedings consistent with the court’s ruling.

CASES CITED

- State v. Thyot, 2018-Ohio-644, ¶ 17 (1st Dist.)
- State v. Harrison, 2021-Ohio-4465, ¶ 11
- State v. Fanning, 1 Ohio St.3d 19, 20 (1982)
- State v. McConico, 2024-Ohio-5657, ¶ 12 (1st Dist.)
- State v. Camper, 2023-Ohio-4673, ¶ 39 (10th Dist.)
- State v. Nichols, 2020-Ohio-5157, ¶ 45 (10th Dist.)
- In re M.D., 2023-Ohio-845, ¶¶ 28, 38 (1st Dist.)
- In re J.T., 2023-Ohio-2695, ¶¶ 15, 30 (1st Dist.)

- State v. Hairston, 2019-Ohio-1622, ¶ 10
- State v. Rogers, 2022-Ohio-4535, ¶ 28 (1st Dist.)
- In re T.B., 2026-Ohio-1309, ¶ 30 (1st Dist.)
- In re M.P., 2014-Ohio-2846, ¶¶ 10-11 (1st Dist.)
- State v. Tarlton, 2002-Ohio-5795, ¶ 9 (4th Dist.)
- State v. Turner, 2018-Ohio-3898, ¶ 11 (9th Dist.)
- State v. Gideon, 2020-Ohio-6961, ¶¶ 2, 26
- State v. Robinson, 2018-Ohio-4433, ¶ 5 (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. McGee, 2016-Ohio-7510, ¶ 26 (1st Dist.)
- State v. Davis, 15 Ohio App.3d 64, 64-65 (1st Dist. 1984)
- In re K.M., 2015-Ohio-4241, ¶ 19 (1st Dist.)
- State v. Davis, 2007-Ohio-5025, ¶ 29
- State v. Dixon, 2024-Ohio-5078, ¶ 14 (1st Dist.)
- State v. Nicely, 39 Ohio St.3d 147, 151 (1988)
- State v. Robinson, 2007-Ohio-2388, ¶ 19 (1st Dist.)
- State v. Straley, 2014-Ohio-2139, ¶¶ 11, 16
- In re T.B., 2026-Ohio-1309, ¶¶ 26-33 (1st Dist.)
- State v. Brown, 2024-Ohio-2148, ¶ 17 (1st Dist.)