

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT

State v. Baffoe

2026-Ohio-1493 · No. 25 CAC 10 0086 · Decided April 23, 2026

SUMMARY

The Ohio Court of Appeals, Fifth Appellate District, affirmed Samuel Baffoe’s conviction for menacing by stalking in the Delaware Municipal Court. The court held that the trial court did not abuse its discretion by declining to order a competency evaluation, finding that the record did not provide reasonable cause to doubt Baffoe’s competency to stand trial.

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District
WRITING FOR THE COURT	William B. Hoffman, P.J.; Craig R. Baldwin, J.; Kevin W. Popham, J.
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District, Delaware County
DECIDED	April 23, 2026
DOCKET	25 CAC 10 0086
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed his misdemeanor conviction for menacing by stalking, arguing that the trial court erred by failing to order a competency examination.
STANDARD OF REVIEW	The decision whether to order a competency evaluation is reviewed for abuse of discretion; an abuse of discretion requires a decision that is unreasonable, arbitrary, or unconscionable.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Samuel Baffoe v. State of Ohio

TOPICS

- criminal procedure
- due process
- standard of review
- appellate procedure

PRACTICE AREAS

- criminal procedure
- appellate procedure
- constitutional law

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by failing to sua sponte order a competency examination after the defendant stated that he did not feel competent to be present because of poor health.

HOLDINGS

1. The trial court did not abuse its discretion in failing to order a competency evaluation because the defendant's statement that he did not feel competent was limited to that day and his health, he displayed no observable signs of incompetency, he did not assert an inability to understand the charges or proceedings, and the record otherwise showed that he understood the proceedings.

KEY QUOTATIONS

“whether [the defendant] has sufficient present ability to consult with his lawyer with a reasonable degree of rational understanding—and whether he has a rational as well as factual understanding of the proceedings against him.” (¶ 14)

“But when there is reasonable cause to doubt a defendant's competency to waive the right to counsel or to stand trial, the trial court must make a sufficient inquiry before proceeding in order to protect the defendant's due process right to a fair trial.” (¶ 15)

FACTUAL BACKGROUND

Baffoe repeatedly denied that he was the defendant, questioned the court's jurisdiction, and made statements concerning his health and a recent medical procedure. Before trial, he stated that he did not feel competent to be present because he was not in good health, but he did not claim that he could not understand the charges or proceedings. The trial court appointed standby counsel, allowed Baffoe to remain seated, offered him water, and proceeded with a bench trial after he declined to consult with counsel and continued interrupting the proceedings.

PROCEDURAL HISTORY

Baffoe was charged in the Delaware Municipal Court with one count of menacing by stalking. After a bench trial, the municipal court found him guilty and sentenced him to 180 days in jail, suspending 165 days. The Ohio Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Jefferson, 2022-Ohio-3448, ¶ 38 (5th Dist.)
- State v. Dye, 1999 WL 770619 (5th Dist.)
- Blakemore v. Blakemore, 5 Ohio St.3d 217, 219 (1983)
- State v. Jefferson, 2022-Ohio-3448, ¶ 39 (5th Dist.)
- State v. Jordan, 2004-Ohio-783, ¶¶ 28-29

- United States v. Coleman, 871 F.3d 470, 475 (6th Cir. 2017)
- State v. Were, 2002-Ohio-481, syllabus ¶ 2

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