

OHIO COURT OF APPEALS, SIXTH APPELLATE DISTRICT, LUCAS
COUNTY

State v. Robinson

2026-Ohio-217 · No. L-25-00023, L-25-00024 · Decided January 23, 2026

SUMMARY

The Sixth District Court of Appeals of Ohio reversed judgments convicting Corey Robinson after guilty pleas to improperly handling firearms in a motor vehicle and carrying concealed weapons. The court held that the trial court should have considered Robinson’s as-applied constitutional challenges to the age-based firearms restrictions in Ohio Revised Code Section 2923.111. The court remanded the matters for the trial court to determine the merits of those challenges and declined to decide the constitutional issue in the first instance.

CASE DETAILS

COURT	Ohio Court of Appeals, Sixth Appellate District, Lucas County
WRITING FOR THE COURT	Charles Sulek; Christine E. Mayle; Gene A. Zmuda
JURISDICTION	Ohio Court of Appeals, Sixth Appellate District, Lucas County
DECIDED	January 23, 2026
DOCKET	L-25-00023, L-25-00024
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Consolidated appeal from judgments of the Lucas County Court of Common Pleas following Robinson's guilty pleas to improperly handling firearms in a motor vehicle and carrying concealed weapons. Robinson challenged the trial court's refusal to decide the merits of his as-applied constitutional motions to dismiss.
STANDARD OF REVIEW	The court reviewed whether the trial court erred by declining to decide motions to dismiss that presented issues capable of determination under Crim.R. 12. The court declined to decide the constitutional merits in the first instance on appeal.
PRECEDENTIAL VALUE	published
PARTIES	Corey Robinson v. State of Ohio

TOPICS

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standard of review

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QUESTIONS PRESENTED

1. Whether the trial court erred by denying Robinson's motions to dismiss without deciding the merits of his as-applied constitutional challenges.
2. Whether the appellate court should decide in the first instance whether the age provision of R.C. 2923.111 is unconstitutional as applied to Robinson under the Second Amendment.

HOLDINGS

1. The trial court erred by declining to rule on the merits of Robinson's as-applied constitutional challenges because the challenges were properly before the court for determination under Crim.R. 12.
2. The appellate court should not decide Robinson's constitutional arguments in the first instance because the trial court had not ruled on them; the constitutional assignment of error was therefore moot.

KEY QUOTATIONS

“Because this Court acts as a reviewing court, it should not consider for the first time on appeal issues that the trial court did not decide.” (¶ 22)

“The matters are remanded to the trial court to determine the merits of Robinson’s “as-applied” constitutional challenges that were raised in his motions to dismiss.” (¶ 24)

FACTUAL BACKGROUND

Robinson, who was 19 years old at the time of the alleged offenses, was indicted in separate cases for improperly handling firearms in a motor vehicle and carrying concealed weapons under provisions including R.C. 2923.111. He argued that the statute's definition of a qualifying adult, which requires a person to be at least 21 years old, was unconstitutional as applied to him. The trial court denied his motions to dismiss without ruling on the constitutional merits, and Robinson subsequently entered guilty pleas.

PROCEDURAL HISTORY

Robinson moved to dismiss the indictments, arguing that the age restriction in R.C. 2923.111 was unconstitutional as applied to him. The trial court denied the motions without deciding their merits, after which Robinson pleaded guilty in the two appealed cases and received community-control sentences. The Sixth District consolidated the appeals, reversed, and remanded for the trial court to determine the merits of the as-applied constitutional challenges.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Lucas County Court of Common Pleas must determine the merits of Robinson's as-applied constitutional challenges raised in his motions to dismiss.

CASES CITED

- State v. Robinson, 2025-Ohio-1431, ¶ 14-18 (6th Dist.)
- State v. Latham, 2025-Ohio-495, ¶ 19 (6th Dist.)
- State v. Palmer, 2012-Ohio-580, ¶ 22-23
- State v. Brady, 2008-Ohio-4493, ¶ 18
- State v. Hoessle, 2025-Ohio-5565, ¶ 17 (9th Dist.)
- Carriage Ins. Agency, Inc. v. Ohio Farmers Ins. Co., 2015-Ohio-2617, ¶ 12 (9th Dist.)
- Iron Horse Bar and Grill, LLC v. GGJ Triune, PLL, 2024-Ohio-284, ¶ 39 (6th Dist.)

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