

COURT OF APPEALS OF OHIO, TENTH APPELLATE DISTRICT

State v. Hollingsworth

2026-Ohio-659 · No. 24AP-336 · Decided February 26, 2026

SUMMARY

The Ohio Tenth District Court of Appeals affirmed Ceedric R. Hollingsworth’s convictions for felonious assault and having weapons while under disability. The court held that statements made during the victim’s 9-1-1 call were nontestimonial because they were made during an ongoing emergency, and alternatively found any error harmless. The court also addressed challenges involving other-acts evidence, alleged judicial bias, and ineffective assistance of counsel.

CASE DETAILS

COURT	Court of Appeals of Ohio, Tenth Appellate District
WRITING FOR THE COURT	Jamison, J.; Boggs, P.J.; Dingus, J.
JURISDICTION	Court of Appeals of Ohio, Tenth Appellate District
DECIDED	February 26, 2026
DOCKET	24AP-336
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed convictions entered after a bench trial in the Franklin County Court of Common Pleas for felonious assault with a firearm specification and having weapons while under disability.
STANDARD OF REVIEW	Confrontation Clause claims are reviewed de novo; Confrontation Clause violations are subject to harmless-error analysis. General evidentiary rulings are reviewed for abuse of discretion. The legal question whether other-acts evidence is admissible under Evid.R. 404(B) is reviewed de novo, while the balancing of probative value against unfair prejudice is reviewed for abuse of discretion. Unobjected-to structural-error claims are reviewed for plain error. Ineffective-assistance claims are governed by the two-part Strickland standard.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Ceedric R. Hollingsworth v. State of Ohio

TOPICS

criminal procedure

sixth amendment

hearsay

character evidence

ineffective assistance

PRACTICE AREAS

criminal procedure

criminal evidence

constitutional criminal procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether admission of the victim's 9-1-1 call violated Hollingsworth's confrontation rights under the Sixth Amendment to the United States Constitution and Article I, Section 10 of the Ohio Constitution.
2. Whether testimony and evidence concerning Hollingsworth's other acts were inadmissible character evidence under Evid.R. 404(B) and deprived him of due process and a fair trial.
3. Whether the trial court committed structural or plain error by questioning witnesses in a biased, prejudicial, or partisan manner.
4. Whether trial counsel rendered ineffective assistance by eliciting other-acts evidence during cross-examination.

HOLDINGS

1. The 9-1-1 statements were nontestimonial because, viewed objectively, their primary purpose was to enable police assistance in addressing an ongoing emergency involving an at-large shooter. Their admission therefore did not violate the Confrontation Clause.
2. Even assuming the trial court erred in admitting the 9-1-1 call, any error was harmless beyond a reasonable doubt because Moore's detailed and corroborated testimony overwhelmingly supported the convictions.
3. The challenged other-acts testimony and evidence were admissible because they were relevant to explaining Moore's delayed disclosure and establishing consciousness of guilt, were offered for legitimate purposes rather than to prove character conformity, and were not substantially outweighed by unfair prejudice.
4. Hollingsworth failed to establish that the trial court questioned witnesses in a biased, prejudicial, or partisan manner. The questioning clarified testimony, often elicited duplicative evidence, and sometimes benefited the defense; therefore, it did not constitute plain or structural error.
5. Hollingsworth failed to establish ineffective assistance of counsel because, even assuming deficient performance, he could not show prejudice under Strickland.

KEY QUOTATIONS

"Statements are nontestimonial when made in the course of police interrogation under circumstances objectively indicating that the primary purpose of the interrogation is to enable police assistance to meet an ongoing emergency." (¶ 36)

"Courts are to apply a three-step analysis in determining whether other-acts evidence is admissible under Evid.R. 404(B)." (¶ 43)

“It follows that appellant has failed to sustain his burden on the second prong of the Strickland test.” (¶ 53)

FACTUAL BACKGROUND

Hollingsworth was accused of firing several shots at his brother, S.B., during a dispute over money. A 9-1-1 caller reported that Hollingsworth had shot at S.B., and police recovered five .45-caliber shell casings. Hollingsworth's former romantic partner, Emily Moore, testified that she saw him retrieve a gun and fire multiple shots at S.B., later direct her to conceal information from police, and attempt to have her retrieve the gun's box and ammunition.

PROCEDURAL HISTORY

A Franklin County grand jury indicted Hollingsworth on felonious assault and having weapons while under disability charges. He moved in limine to exclude a 9-1-1 call under the Confrontation Clause, waived a jury trial, and was found guilty after a bench trial. The trial court imposed a total indefinite prison term of six to seven and one-half years, consecutive to a sentence in another case. The Tenth District overruled all four assignments of error and affirmed.

DISPOSITION

affirmed

CASES CITED

- Crawford v. Washington, 541 U.S. 36, 53-54, 68 (2004)
- Davis v. Washington, 547 U.S. 813, 822 (2006)
- Michigan v. Bryant, 562 U.S. 344, 359-360 (2011)
- State v. Durdin, 2014-Ohio-5759, ¶ 15 (10th Dist.)
- State v. Phillips, 2019-Ohio-2930, ¶ 13 (10th Dist.)
- State v. Elkhabiry, 2025-Ohio-1028 (10th Dist.)
- State v. Wilcox, 2024-Ohio-5719, ¶ 13
- Columbus v. C.G., 2021-Ohio-71, ¶ 29 (10th Dist.)
- State v. Jones, 2008-Ohio-3565, ¶ 13 (10th Dist.)
- State v. Conway, 2006-Ohio-2815, ¶ 62
- State v. Stanford, 2024-Ohio-1451, ¶ 14 (10th Dist.)
- State v. Hartman, 2020-Ohio-4440, ¶ 22
- State v. Bridges, 2015-Ohio-4480, ¶ 7 (10th Dist.)
- Blakemore v. Blakemore, 5 Ohio St.3d 217, 219 (1983)
- State v. Williams, 2012-Ohio-5695, ¶¶ 19-20
- State v. Hasbrouck, 2025-Ohio-5816, ¶ 20 (10th Dist.)
- State v. White, 2015-Ohio-5365, ¶ 19 (10th Dist.)
- State v. Campbell, 2009-Ohio-3615, ¶ 25 (10th Dist.)

- State v. Bond, 2022-Ohio-4150, ¶¶ 26, 42
- Arizona v. Fulminante, 499 U.S. 279, 309-310 (1991)
- Rose v. Clark, 478 U.S. 570, 577-578 (1986)
- State v. Phillips, 2025-Ohio-4555, ¶ 29 (10th Dist.)
- State v. Santiago, 2003-Ohio-2877, ¶ 11
- State v. Blankenship, 102 Ohio App.3d 534, 548 (12th Dist. 1995)
- State v. Sanders, 92 Ohio St. 3d 245, 278 (2001)
- State v. Granderson, 2008-Ohio-3757, ¶ 67 (5th Dist.)
- State v. Phillips, 2014-Ohio-5162, ¶ 149 (10th Dist.)
- Strickland v. Washington, 466 U.S. 668, 687-688, 694 (1984)
- State v. Rhoades, 2020-Ohio-2688, ¶ 42 (10th Dist.)
- State v. Bradley, 42 Ohio St.3d 136, 141-142 (1989)
- State v. Diallo, 2025-Ohio-920, ¶ 28 (10th Dist.)
- State v. Elmore, 2006-Ohio-6207, ¶ 116
- State v. Pardon, 2022-Ohio-663, ¶ 36 (10th Dist.)
- State v. Hunt, 2013-Ohio-5326, ¶ 116 (10th Dist.)
- State v. Zhu, 2021-Ohio-4577, ¶ 61
- In re Brooks, 2004-Ohio-3887, ¶ 40