

COURT OF APPEALS OF OHIO, EIGHTH APPELLATE DISTRICT,
CUYAHOGA COUNTY

State v. Robinson

2025-Ohio-5413 · No. 114912 · Decided December 4, 2025

SUMMARY

The Ohio Eighth District Court of Appeals affirmed the denial of James Robinson's motion to suppress evidence obtained after agents observed what appeared to be a firearm on his person and stopped him outside a gas station displaying a no-firearms sign. The court held that the agents had reasonable suspicion for the investigative stop, and that the firearm visible inside Robinson's vehicle was subject to seizure under the plain-view and automobile exceptions. The court also concluded that the agents had probable cause to arrest Robinson, who was prohibited from possessing firearms.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Michael John Ryan; Lisa B. Forbes; Emanuella D. Groves
JURISDICTION	Ohio Court of Appeals, Eighth Appellate District, Cuyahoga County
DECIDED	December 4, 2025
DOCKET	114912
DISPOSITION	affirmed
PROCEDURAL POSTURE	Robinson appealed from the denial of his motion to suppress evidence. After the denial, he pleaded no contest, was convicted on all three counts, sentenced to 27 months in prison, and ordered to forfeit the firearm.
STANDARD OF REVIEW	Appellate review of a motion to suppress presents a mixed question of law and fact. The appellate court defers to factual findings supported by competent, credible evidence but independently determines whether the facts satisfy the applicable legal standard.
PRECEDENTIAL VALUE	published
PARTIES	James Robinson v. State of Ohio

TOPICS

- fourth amendment
- search and seizure
- probable cause
- suppression of evidence
- appellate procedure

PRACTICE AREAS

criminal procedure

constitutional law

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the agents had reasonable suspicion based on specific and articulable facts to conduct a Terry stop after observing Robinson apparently carrying a firearm into and out of a gas station that prohibited firearms.
2. Whether the firearm observed through the open driver-side door was subject to seizure under the plain-view doctrine and automobile exception to the Fourth Amendment warrant requirement.
3. Whether the agents had probable cause to arrest Robinson after observing the firearm, learning that he was prohibited from possessing firearms, and considering the surrounding circumstances.
4. Whether the trial court erred in denying Robinson's motion to suppress.

HOLDINGS

1. The agents had reasonable suspicion to stop Robinson because trained agents observed what appeared to be a firearm in his pocket as he entered and exited premises displaying a sign prohibiting firearms.
2. The firearm was lawfully subject to seizure because agents observed it in plain view from a lawful position and had probable cause to believe the vehicle contained a firearm, permitting access under the automobile exception.
3. The agents had probable cause to arrest Robinson, and the warrantless arrest did not violate the Fourth Amendment.

KEY QUOTATIONS

“Reasonable suspicion is defined as something more than a mere hunch, yet less than the level of certainty required for probable cause.”

“To justify a particular intrusion, ‘the police officer must be able to point to specific and articulable facts, which taken together with rational inferences from those facts, reasonably warrant that intrusion.’”

“The plain-view doctrine holds that objects falling in the plain view of an officer who has a right to be in the position to have that view are subject to seizure and may be introduced in evidence.”

“The automobile exception allows law enforcement to search a validly stopped vehicle when law enforcement has probable cause that indicates the vehicle contains contraband or evidence of a crime.”

FACTUAL BACKGROUND

Ohio Investigative Unit agents conducting surveillance at a Cleveland gas station observed Robinson enter and exit the premises with what appeared to be a firearm visibly printing through his clothing. The gas station displayed a sign prohibiting firearms, and Robinson entered his vehicle immediately after exiting. During the ensuing investigative stop, agents saw a firearm in plain view between the driver's seat and center console; they also learned that Robinson was on parole and legally prohibited from possessing firearms.

PROCEDURAL HISTORY

The Cuyahoga County Court of Common Pleas denied Robinson's motion to suppress following an evidentiary hearing. Robinson then pleaded no contest to having weapons while under disability, carrying a concealed weapon, and improperly handling firearms in a motor vehicle. The trial court found him guilty, imposed a 27-month prison sentence, and ordered forfeiture of the firearm. The Eighth District affirmed.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The case was remanded to the trial court for execution of sentence, and a special mandate was ordered. Bail pending appeal was terminated.

CASES CITED

- State v. Burnside, 2003-Ohio-5372, ¶ 8
- State v. Mathis, 2024-Ohio-5707, ¶ 24 (8th Dist.)
- State v. Hill, 2005-Ohio-3155 (8th Dist.)
- State v. Hicks, 2023-Ohio-4126, ¶ 34
- Carpenter v. United States, Carpenter v. United States, 585 U.S. 296, 303 (2018)
- Katz v. United States, 389 U.S. 347, 357 (1967)
- Terry v. Ohio, 392 U.S. 1 (1968)
- Delaware v. Prouse, 440 U.S. 648, 653 (1979)
- Navarette v. California, 572 U.S. 393, 396 (2014)
- Fairview Park v. Bowman, 2023-Ohio-4210, ¶ 52 (8th Dist.)
- State v. Jones, 2014-Ohio-2763 (8th Dist.)
- Solon v. Moore, 2025-Ohio-2446, ¶ 38 (8th Dist.)
- Parma v. Coyne, 2024-Ohio-3192, ¶ 19
- State v. Chambers, 1977 Ohio App. LEXIS 7197, *3 (8th Dist. Jan. 13, 1977)
- State v. Travis, 2013-Ohio-581, ¶ 13 (8th Dist.)
- Harris v. United States, 390 U.S. 234, 236 (1968)
- State v. Travick, 2023-Ohio-460, ¶ 16 (8th Dist.)
- State v. Moore, 90 Ohio St.3d 47, 51 (2000)
- State v. Hopper, 2009-Ohio-2711, ¶ 30 (8th Dist.)
- State v. Brown, 2007-Ohio-4837, ¶ 66
- United States v. Watson, 423 U.S. 411, 417 (1976)
- State v. Doss, 2020-Ohio-5510, ¶ 14 (8th Dist.)
- Cleveland v. Jones, 2019-Ohio-1525, ¶ 26 (8th Dist.)

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