

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

State v. Reid

2026-Ohio-1764 · No. Nos. 115108 and 115290 · Decided May 14, 2026

SUMMARY

The Ohio Eighth District Court of Appeals affirmed Austin D. Reid’s convictions for murder and felonious assault arising from the shooting death of Kneina Scott. The court rejected challenges based on manifest weight of the evidence, failure to give a self-defense instruction, admission of cell-phone extraction evidence, and related trial errors. It remanded the matter for the trial court to calculate jail-time credit.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Eileen T. Gallagher, Presiding Judge; Michael John Ryan, Judge; Kathleen Ann Keough, Judge
JURISDICTION	Ohio Court of Appeals, Eighth Appellate District, Cuyahoga County
DECIDED	May 14, 2026
DOCKET	Nos. 115108 and 115290
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Reid appealed jury convictions and his sentence from the Cuyahoga County Court of Common Pleas, challenging the manifest weight of the evidence, refusal to give a self-defense instruction, admission and authentication of cell-phone extraction evidence, admission of evidence that he sought an attorney, jail-time-credit calculation, and cumulative error.
STANDARD OF REVIEW	Manifest-weight challenges are reviewed by weighing the evidence, reasonable inferences, and witness credibility to determine whether the jury clearly lost its way and created a manifest miscarriage of justice; reversal is reserved for the exceptional case in which the evidence weighs heavily against conviction. Refusal to give a jury instruction is reviewed for abuse of discretion, subject to the requirement that the instruction be legally correct, appropriate to the facts, and supported by evidence. Evidentiary rulings, including authentication and

	exclusion under Evid.R. 403(A), are reviewed for abuse of discretion. Trial error is reviewed for harmless error under Crim.R. 52(A).
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion; precedential within the scope of Ohio appellate authority.
PARTIES	Austin D. Reid v. State of Ohio

TOPICS

criminal procedure evidence self defense authentication sentencing

PRACTICE AREAS

criminal law criminal procedure appellate litigation evidence sentencing

QUESTIONS PRESENTED

1. Whether Reid's convictions were against the manifest weight of the evidence.
2. Whether the trial court abused its discretion by refusing to instruct the jury on self-defense.
3. Whether the State sufficiently authenticated the contents of Reid's cell-phone extraction and whether admission of his Instagram message seeking an attorney violated Evid.R. 403(A).
4. Whether admission of the message seeking an attorney violated Reid's Sixth Amendment right to counsel or Fifth Amendment privilege against self-incrimination.
5. Whether the trial court erred by failing to calculate and apply jail-time credit.
6. Whether cumulative error deprived Reid of a fair trial.

HOLDINGS

1. The convictions were not against the manifest weight of the evidence because the jury did not clearly lose its way or create a manifest miscarriage of justice.
2. The trial court properly refused to give a self-defense instruction because the evidence did not support the defense; Reid was at fault in creating the situation by returning to Scott's property after being told to leave.
3. The trial court did not abuse its discretion by admitting the cell-phone extraction because the State established a sufficient basis for authentication.
4. The trial court erred by admitting Reid's Instagram message asking for the name of an attorney because its probative value was substantially outweighed by the danger of unfair prejudice, but the error was harmless.
5. The majority held that admission of Reid's prearrest message seeking the name of an attorney did not violate the Sixth Amendment right to counsel or the Fifth Amendment privilege because no prosecution had commenced, Reid was not in custody, and he did not expressly invoke either right.
6. The trial court committed reversible error by failing to calculate and apply any jail-time credit.

7. Cumulative error did not require reversal because the alleged trial errors were harmless or nonexistent, and the jail-time-credit error occurred after trial and did not affect trial fairness.

KEY QUOTATIONS

“A requested jury instruction should be given if it contains a correct statement of the law, is appropriate to the facts, and reasonable minds might reach the conclusion sought by the instruction.” (¶ 64)

“A trespasser is not entitled to claim self-defense because by invading the victim’s property without permission, the trespasser created the situation giving rise to the affray.” (¶ 71)

“The State need only demonstrate a “reasonable likelihood” that the evidence is authentic.” (¶ 83)

“We nevertheless find the error harmless.” (¶ 96)

“Under the plain language of the Sixth Amendment, the right to counsel belongs to an accused and does not attach until a criminal prosecution has commenced.” (¶ 108)

“However, the doctrine of cumulative error is inapplicable when the alleged errors are found to be harmless or nonexistent.” (¶ 138)

FACTUAL BACKGROUND

During a violent dispute at Shirley Scott’s home, Reid left after being told to do so but returned with a firearm. Scott fired one warning shot into the air, after which Reid fired multiple shots toward the home; one struck and killed Scott’s sister, Kneina Scott. Police recovered a Glock 10 mm handgun from Reid’s mother’s home, matched the crime-scene cartridge casing to that gun, found Reid’s DNA on it, and detected gunshot-primer residue on clothing Reid wore when he fled the hospital. Police also extracted data from Reid’s cell phone, including searches for types of murders and Marymount Hospital and a message seeking an attorney.

PROCEDURAL HISTORY

Reid was charged with murder, felonious assault, domestic violence, firearm offenses, intimidation, and having weapons while under disability. The trial court severed Counts 5 through 8 from Counts 1 through 4; after trial on Counts 1 through 4, the jury convicted Reid of murder and two counts of felonious assault, with firearm specifications, and the domestic-violence charge was dismissed. The court imposed an aggregate sentence of 21 years to life and later imposed concurrent one-year sentences after Reid pleaded guilty to Counts 6 and 7. The appellate court affirmed the convictions but remanded for calculation and application of jail-time credit.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Cuyahoga County Court of Common Pleas for the limited purpose of calculating and applying the appropriate jail-time credit and executing the sentence. The convictions and remaining judgment are affirmed.

CASES CITED

- State v. Virostek, 2022-Ohio-1397, ¶ 54 (8th Dist.)
- State v. Martin, 20 Ohio App.3d 172, 175 (1st Dist. 1983)
- State v. Thompson, 78 Ohio St.3d 380, 387 (1997)
- State v. Price, 2026-Ohio-688, ¶ 32 (5th Dist.)
- State v. Weems, 2016-Ohio-701, ¶¶ 29-30 (8th Dist.)
- State v. Daniel, 2016-Ohio-5231, ¶ 30 (8th Dist.)
- State v. Leonard, 2013-Ohio-1446, ¶ 33 (8th Dist.)
- Johnson v. Abdullah, 2021-Ohio-3304, ¶¶ 35, 38
- State v. Davidson-Dixon, 2021-Ohio-1485, ¶¶ 18, 20 (8th Dist.)
- State v. Hawthorne, 2018-Ohio-1180, ¶ 21 (8th Dist.)
- State v. Messenger, 2022-Ohio-4562, ¶ 14
- State v. Barnes, 2002-Ohio-68
- Ellis v. State, 64 Ohio St.3d 391, 395-396 (1992)
- State v. White, 2019-Ohio-4288, ¶ 18 (4th Dist.)
- State v. Higgins, 2002-Ohio-4679, ¶ 19 (2d Dist.)
- State v. Melchior, 56 Ohio St.2d 15 (1978)
- State v. Horton, 2015-Ohio-99, ¶ 19 (8th Dist.)
- State v. Freeze, 2012-Ohio-5840, ¶ 65 (12th Dist.)
- State v. Dobson, 2025-Ohio-2148, ¶ 30 (8th Dist.)
- State v. Roseberry, 2011-Ohio-5921, ¶ 65 (8th Dist.)
- State v. Lautenan, 2023-Ohio-1945, ¶¶ 58-62 (11th Dist.)
- State v. Wright, 2019-Ohio-4460, ¶ 50 (8th Dist.)
- State v. Maurer, 15 Ohio St.3d 239 (1984)
- State v. Lang, 2011-Ohio-4215, ¶ 89
- Oberlin v. Akron General Medical Center, 91 Ohio St.3d 169, 172 (2001)
- State v. Perry, 2004-Ohio-297, ¶ 15
- United States v. Olano, 507 U.S. 725, 741 (1993)
- State v. Morris, 2014-Ohio-5052, ¶¶ 24-25
- Rothgery v. Gillespie County, Texas, 554 U.S. 191, 198 (2008)
- State v. Taylor, 2024-Ohio-1752, ¶ 22
- Gorel v. United States, 531 F. Supp. 368, 371 (S.D. Tex. 1981)
- State v. Gladding, 66 Ohio App.3d 502, 508 (11th Dist. 1990)
- Salinas v. Texas, 570 U.S. 178, 181, 183, 190 (2013)
- Minnesota v. Murphy, 465 U.S. 420, 425, 427 (1984)
- United States v. Monia, 317 U.S. 424, 427 (1943)
- Abby v. Howe, 742 F.3d 221, 228 (6th Cir. 2014)

- State v. Leach, 2004-Ohio-2147, ¶ 38
- Martin v. State, 364 Md. 692, 707-708 (2001)
- State v. Hunter, 2008-Ohio-6962, ¶ 16 (10th Dist.)
- State v. Abdullah, 2020-Ohio-4813, ¶ 41 (7th Dist.)
- State v. Thompson, 2015-Ohio-3882, ¶ 23 (8th Dist.)
- State v. Garrett, 2022-Ohio-4218, ¶ 270
- State v. Powell, 2012-Ohio-2577, ¶ 223
- State v. Allen, 2016-Ohio-102, ¶ 53 (8th Dist.)
- State v. Brown, 2003-Ohio-5059, ¶ 48
- State v. Angel T., 292 Conn. 262 (2009)
- Sizemore v. Fletcher, 921 F.2d 667, 671 (6th Cir. 1990)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/ohio-court-of-appeals-eighth-appellate-district-cuyahoga-county-court-of-appeals-of-ohio-eighth-appel/2026/state-v-reid-jairkc07>