

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT

State v. Hammonds

2026-Ohio-2295 · No. 25CA0049, 25CA0050, and 25CA0051 · Decided June 17, 2026

SUMMARY

The Ohio Court of Appeals, Fifth Appellate District, affirmed Randell Hammonds’s aggregate prison sentences for felony offenses committed while he was under post-release-control supervision. The court held that, because Hammonds did not object at sentencing, review was limited to plain error, and found no plain error in the trial court’s consideration of Ohio sentencing statutes or imposition of consecutive terms.

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District
WRITING FOR THE COURT	David M. Gormley; Craig R. Baldwin; Kevin W. Popham
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District, Guernsey County
DECIDED	June 17, 2026
DOCKET	25CA0049, 25CA0050, and 25CA0051
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hammonds appealed his felony sentences from the Guernsey County Court of Common Pleas after pleading guilty to receiving stolen property, escape, and failure to comply. He argued that the trial court failed to comply with Ohio's felony-sentencing statutes by imposing sentences greater than the minimum terms.
STANDARD OF REVIEW	Because Hammonds did not object to the sentence after being given a meaningful opportunity to do so, the court reviewed the sentence solely for plain error. Under R.C. 2953.08(G)(2), felony sentences may otherwise be modified or remanded only upon clear and convincing evidence that the sentencing findings are unsupported by the record or that the sentence is otherwise contrary to law.
PRECEDENTIAL VALUE	Published and precedential Ohio Court of Appeals opinion
PARTIES	Randell Lionel Hammonds v. State of Ohio

TOPICS

sentencing

criminal procedure

sentencing guidelines

preservation of error

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether Hammonds forfeited review of his sentencing challenge by failing to object after the trial court announced the sentence.
2. Whether the trial court committed plain error by imposing felony sentences above the minimum terms without adequately considering the purposes of felony sentencing and the seriousness and recidivism factors under R.C. 2929.11 and R.C. 2929.12.
3. Whether the imposed prison terms, consecutive sentences, and additional post-release-control sanction were contrary to law.

HOLDINGS

1. When a criminal defendant does not object to a sentence after being given a meaningful opportunity to raise the issue in the trial court, the sentencing challenge is forfeited and the appellate court reviews only for plain error.
2. Plain error must be apparent on the record, palpable, and fundamental, and notice of plain error is reserved for exceptional circumstances necessary to prevent a manifest miscarriage of justice.
3. A felony sentence is not contrary to law when it falls within the statutory range and the trial court considers the purposes of felony sentencing and the applicable seriousness and recidivism factors; the court need not state its reasons for selecting a particular sentence within the statutory range or use specific language or make specific findings to demonstrate that consideration.
4. The consecutive sentences and additional 12-month sentence imposed for new felony offenses committed while Hammonds was under post-release control were not contrary to law because the applicable statutes required or authorized the consecutive terms and the trial court made the required consecutive-sentence findings.

KEY QUOTATIONS

“In light of that fact, and because Hammonds did not object to the sentence imposed, we review Hammonds’s sentence solely for plain error.” (§ 11)

“Although a trial court must consider the factors in R.C. 2929.11 and 2929.12, there is no requirement that the court state its reasons . . . for imposing a particular sentence within the statutory range.” (§ 15)

“We see no error — and certainly no plain error — in the sentences imposed by the trial court.” (§ 22)

FACTUAL BACKGROUND

While under post-release-control supervision, Hammonds attempted to sell a stolen vehicle. He failed to appear for arraignment and stopped reporting to his parole officer; after an arrest warrant issued, he was arrested following a high-speed chase during which he drove left of center and struck another vehicle. He later pleaded guilty to receiving stolen property, escape, and failure to comply.

PROCEDURAL HISTORY

Hammonds pleaded guilty to three felony offenses committed while he was under post-release-control supervision. The trial court imposed an aggregate 54-month term for the three offenses, ordered the terms to run consecutively, terminated post-release control, and imposed an additional consecutive 12-month term under R.C. 2929.141(A)(1). Hammonds did not object after the sentence was announced, and the court of appeals reviewed the sentence solely for plain error and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Jones, State v. Jones, 2020-Ohio-6729, ¶ 29
- State v. Ogden, 2025-Ohio-1168, ¶ 14 (4th Dist.)
- State v. Truesdell, 2024-Ohio-5376, ¶ 79 (1st Dist.)
- State v. Bright, 2025-Ohio-725, ¶¶ 7, 9-10 (5th Dist.)
- State v. Haudenschild, 2024-Ohio-407, ¶ 15 (5th Dist.)
- State v. Whitaker, 2022-Ohio-2840, ¶ 166
- State v. Dunlap, 2004-Ohio-6652, ¶ 34 (8th Dist.)
- State v. Long, 53 Ohio St.2d 91 (1978), paragraph three of the syllabus
- State v. Webb, 2019-Ohio-4195, ¶ 17 (5th Dist.)
- State v. Arnett, 88 Ohio St.3d 208, 215 (2000)
- State v. Hess, 2024-Ohio-2842, ¶ 33 (5th Dist.)
- State v. Boyd, 2025-Ohio-984, ¶ 53 (2d Dist.)