

OHIO COURT OF APPEALS, SIXTH APPELLATE DISTRICT

State v. Byars

2025-Ohio-5733 · No. WD-25-025 · Decided December 23, 2025

SUMMARY

The Sixth District Court of Appeals of Ohio affirmed the Wood County Court of Common Pleas judgment sentencing Marion Byars to community control after terminating intervention in lieu of conviction. The court held that Byars’s guilty pleas waived her challenge to the manifest weight of the evidence and that the trial court was not required to establish a factual basis for the pleas during the Crim.R. 11 colloquy.

CASE DETAILS

COURT	Ohio Court of Appeals, Sixth Appellate District
WRITING FOR THE COURT	Christine E. Mayle; Thomas J. Osowik; Gene A. Zumda
JURISDICTION	Ohio Court of Appeals, Sixth Appellate District
DECIDED	December 23, 2025
DOCKET	WD-25-025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Byars appealed her convictions and community-control sentence imposed after the trial court terminated intervention in lieu of conviction following violations of its terms.
STANDARD OF REVIEW	The court reviewed the legal effect of Byars's guilty pleas and whether the trial court complied with Crim.R. 11(C); it did not reach the manifest-weight challenge because the guilty pleas waived that issue.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals decision
PARTIES	Marion Byars v. State of Ohio

TOPICS

- criminal procedure
- plea bargaining
- appellate procedure
- preservation of error

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate practice

QUESTIONS PRESENTED

1. Whether the trial court erred by accepting Byars's guilty pleas and entering findings of guilt without independently determining or placing on the record a factual basis for the offenses.
2. Whether the absence of a factual recitation rendered the pleas invalid under Crim.R. 11(C)(2)(a).
3. Whether Byars could challenge the manifest weight of the evidence after pleading guilty.

HOLDINGS

1. A trial court is not required to determine that a factual basis exists for a defendant's guilty plea as part of the Crim.R. 11(C) plea colloquy; therefore, the trial court did not err by failing to inquire into the facts underlying Byars's offenses.
2. A defendant who pleads guilty waives the right to challenge the manifest weight of the evidence on appeal.

KEY QUOTATIONS

“We have held that a ‘guilty plea itself provides the necessary proof of the elements of the crime, thus relieving the trial court of the obligation to determine whether a factual basis exists to support the plea.’” (¶ 8)

FACTUAL BACKGROUND

Byars was indicted for trespass in a habitation when a person is present or likely to be present and criminal damaging or endangering. She pleaded guilty and stipulated in writing and during the intervention hearing that a factual basis supported conviction, after which the trial court placed her on intervention in lieu of conviction. She later violated the intervention terms by testing positive for THC twice; she chose termination of intervention, conviction on the charged offenses, and community control rather than continued intervention with additional conditions.

PROCEDURAL HISTORY

Byars pleaded guilty to trespass in a habitation and criminal damaging or endangering under an agreement that the State would not oppose intervention in lieu of conviction. The trial court accepted the pleas after a Crim.R. 11 colloquy and placed her on intervention in lieu of conviction. After Byars tested positive for THC twice and admitted violating the terms, the trial court terminated intervention, entered findings of guilt, and sentenced her to community control. The Sixth District affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Gibson, 2023-Ohio-1776, ¶ 12 (6th Dist.)
- State v. Jones, 2017-Ohio-342, ¶ 8 (6th Dist.)

- State v. Williams, 2004-Ohio-4856, ¶ 12 (6th Dist.)
- State v. Norris, 2019-Ohio-1488, ¶ 10 (6th Dist.)

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