

OHIO COURT OF APPEALS, ELEVENTH APPELLATE DISTRICT

State v. Patton

2026-Ohio-780 · No. 2025-A-0033, 2025-A-0034, 2025-A-0035 · Decided March 9, 2026

SUMMARY

The Eleventh District Court of Appeals of Ohio affirmed Jack Wesley Patton Jr.'s convictions and indefinite eight-to-twelve-year prison sentence following guilty pleas to two counts of felonious assault and one count of aggravated possession of drugs. The court held that his guilty pleas, including an Alford plea, were knowing, intelligent, and voluntary, and that his guilty pleas waived challenges concerning a continuance, investigative funds, and ineffective assistance of counsel. The court concluded that Patton failed to demonstrate prejudice or coercion.

CASE DETAILS

COURT	Ohio Court of Appeals, Eleventh Appellate District
WRITING FOR THE COURT	Matt Lynch, P.J.; John J. Eklund, J.; Scott Lynch, J.
JURISDICTION	Ohio Court of Appeals, Eleventh Appellate District, Ashtabula County
DECIDED	March 9, 2026
DOCKET	2025-A-0033, 2025-A-0034, 2025-A-0035
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed judgments of the Ashtabula County Court of Common Pleas accepting his guilty pleas and sentencing him to an indefinite prison term of eight to twelve years in three criminal cases.
STANDARD OF REVIEW	The court reviewed de novo whether the trial court accepted the pleas in compliance with Ohio Criminal Rule 11. Claims concerning pre-plea proceedings and ineffective assistance were evaluated under the rule that a guilty plea waives prior errors unless they affected the knowing and voluntary character of the plea.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Jack Wesley Patton, Jr. v. State of Ohio

TOPICS

- plea bargaining
- criminal procedure
- right to counsel
- ineffective assistance
- appellate procedure

PRACTICE AREAS

criminal procedure

plea bargaining

ineffective assistance

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court erred by denying Patton additional time to retain counsel and funds for an investigator.
2. Whether Patton's guilty pleas, including his Alford plea, were knowing, intelligent, and voluntary under Ohio Criminal Rule 11.
3. Whether trial counsel was ineffective for failing to investigate potential witnesses, timely seek an investigator, or request a continuance.

HOLDINGS

1. A guilty plea breaks the chain of prior criminal proceedings and waives challenges to pre-plea actions by the trial court or counsel unless the alleged error affected the knowing and voluntary nature of the plea.
2. When the record shows that the trial court complied with Crim.R. 11(C), a guilty plea is presumed knowing and voluntary, and the defendant must demonstrate prejudice to obtain reversal.
3. An Alford plea is valid when the record shows that the defendant was not coerced, deceived, or intimidated; had competent counsel; understood the charges; rationally sought a lesser penalty or avoided trial risks; and the State provided a factual basis supporting that rational calculation.

KEY QUOTATIONS

“a guilty plea represents a break in the chain of events that preceded it in the criminal process; thus, a defendant, who admits his guilt, waives the right to challenge the propriety of any action taken by a trial court or trial counsel prior to that point in the proceedings unless it affected the knowing and voluntary character of the plea.” (¶ 18)

“An Alford plea is a plea of guilty entered with a contemporaneous protestation of innocence.” (¶ 31)

FACTUAL BACKGROUND

Patton was indicted in three cases arising from felony conduct, including attempted murder, felonious assault, aggravated robbery, and drug offenses. After he informally sought additional time to retain new counsel and asked about funds for an investigator, the trial court advised that it would consider a formal continuance motion but trial remained scheduled. On the morning of trial, Patton accepted a plea agreement under which he pleaded guilty to two counts of felonious assault and one count of aggravated possession of drugs, including an Alford plea, in exchange for dismissal of four counts and concurrent sentences totaling eight to twelve years. During the Crim.R. 11 colloquy, he stated that he was not threatened or promised anything, understood the charges and penalties, and was satisfied with counsel.

PROCEDURAL HISTORY

Patton was indicted in three Ashtabula County cases on charges including attempted murder, felonious assault, aggravated robbery, aggravated possession of drugs, and possession of drugs. Shortly before trial, he entered guilty pleas to two counts of felonious assault and one count of aggravated possession of drugs, including an Alford plea to one felonious-assault count. The trial court dismissed the remaining counts, imposed concurrent sentences totaling eight to twelve years, and Patton appealed, challenging continuance and investigator requests, the validity of his pleas, and ineffective assistance of counsel.

DISPOSITION

affirmed

CASES CITED

- State v. Wilmington, 2023-Ohio-512, ¶¶ 25-26 (11th Dist.)
- State v. Madeline, 2002 WL 445036, *4 (11th Dist. Mar. 22, 2002)
- State v. Muhammad, 2014-Ohio-5771, ¶ 41
- State v. Byas, 2022-Ohio-1814, ¶ 20 (11th Dist.)
- State v. Willard, 2021-Ohio-2552, ¶¶ 51-52 (11th Dist.)
- State v. Engle, 74 Ohio St.3d 525, 527 (1996)
- State v. Barker, 2011-Ohio-4130, ¶ 9
- State v. Dangler, 2020-Ohio-2765, ¶¶ 13-17
- State v. Sarkozy, 2008-Ohio-509, ¶ 22
- North Carolina v. Alford, 400 U.S. 25 (1971)
- State v. Obhof, 2023-Ohio-408, ¶¶ 39-42 (11th Dist.)
- State v. Padgett, 67 Ohio App.3d 332, 338 (2d Dist. 1990)
- State v. Piacella, 27 Ohio St.2d 92, syllabus (1971)
- State v. Wasilewski, 2020-Ohio-5141, ¶ 23 (11th Dist.)
- State v. Gil, 2019-Ohio-839, ¶ 11 (11th Dist.)

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