

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT, KNOX COUNTY

State v. Steele

2026-Ohio-2162 · No. 26CA000001 · Decided June 9, 2026

SUMMARY

The Ohio Court of Appeals for the Fifth Appellate District affirmed Paul A. Steele's conviction and sentence for misdemeanor domestic violence. The court held that Steele knowingly, intelligently, and voluntarily entered his guilty plea and that the trial court substantially complied with Ohio Criminal Rule 11. The court also rejected his claims concerning the plea's admission-of-guilt effect, immediate sentencing, and presentence investigation.

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District, Knox County
WRITING FOR THE COURT	William B. Hoffman, Presiding Judge; Craig R. Baldwin, Judge; Kevin W. Popham, Judge
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District, Knox County
DECIDED	June 9, 2026
DOCKET	26CA000001
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed the January 22, 2026 sentencing entry following his guilty plea to an amended first-degree-misdemeanor domestic-violence charge, arguing that the plea was not knowingly, intelligently, and voluntarily entered.
STANDARD OF REVIEW	De novo review applies to whether the trial court accepted the guilty plea in compliance with Crim.R. 11. Nonconstitutional advisements are reviewed under substantial compliance, and the defendant must demonstrate prejudice by showing that the plea would not otherwise have been entered.
PRECEDENTIAL VALUE	published
PARTIES	Paul A. Steele v. State of Ohio

TOPICS

- criminal procedure
- due process
- appellate procedure
- standard of review

PRACTICE AREAS

criminal procedure

appellate procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the trial court accepted Steele's guilty plea in compliance with Crim.R. 11 and constitutional due-process requirements.
2. Whether the trial court adequately advised Steele that his guilty plea constituted a complete admission of guilt.
3. Whether the trial court adequately advised Steele that it could proceed immediately to sentencing after accepting the plea.
4. Whether Steele demonstrated prejudice from any alleged noncompliance with Crim.R. 11.

HOLDINGS

1. The trial court strictly complied with the constitutional notification requirements and substantially complied with the nonconstitutional notification requirements of Crim.R. 11.
2. The trial court substantially complied with Crim.R. 11(B)(1) because it advised Steele that admitting the facts constituted an admission of guilt to the domestic-violence charge.
3. The record contradicted Steele's claim because the trial court expressly told him that he could proceed to sentencing immediately if he waived a presentence investigation, and Steele agreed.
4. Steele failed to establish prejudice because he did not show that he would not have entered the plea but for any alleged Crim.R. 11 error.

KEY QUOTATIONS

“In reviewing a plea colloquy, the focus is not “on whether the trial judge has ‘[incanted] the precise verbiage’ of the rule, State v. Stewart, 51 Ohio St.2d 86, 92 (1977), but on whether the dialogue between the court and the defendant demonstrates that the defendant understood the consequences of his plea.”” (¶ 9)

““Substantial compliance means that under the totality of the circumstances the defendant subjectively understands the implications of his plea and the rights he is waiving.”” (¶ 12)

FACTUAL BACKGROUND

Steele was indicted for domestic violence under R.C. 2919.25(A), initially charged as a fourth-degree felony. He later pleaded guilty to an amended first-degree-misdemeanor charge after the trial court conducted a Crim.R. 11 colloquy, during which he admitted the facts and his guilt. Steele signed and confirmed his understanding of a written plea agreement, waived a presentence investigation, and was sentenced immediately to 150 days in jail with 45 days of credit.

PROCEDURAL HISTORY

A Knox County grand jury indicted Steele for fourth-degree-felony domestic violence. After repeated violations of pretrial-release conditions and several continuances, Steele withdrew his not-guilty plea, pleaded guilty to an

amended first-degree-misdemeanor domestic-violence charge, and waived a presentence investigation. The trial court accepted the plea, found him guilty, and sentenced him to 150 days in jail with credit for 45 days served. The Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Clark, 2008-Ohio-3748, ¶ 25
- State v. Scott, 2025-Ohio-1244, ¶ 17 (4th Dist.)
- State v. Stone, 43 Ohio St.2d 163, 168 (1975)
- State v. Jones, 2007-Ohio-6093, paragraph one of syllabus
- State v. Willard, 2021-Ohio-2552, ¶ 51 (11th Dist.)
- State v. Stewart, 51 Ohio St.2d 86, 92 (1977)
- State v. Dangler, 2020-Ohio-2765, ¶¶ 12-13
- State v. Carder, 2026-Ohio-1061, ¶¶ 9-10 (5th Dist.)
- State v. Griggs, 2004-Ohio-4415, ¶¶ 11-12
- State v. Veney, 2008-Ohio-5200, ¶ 15
- State v. Kirvin, 2026-Ohio-1527, ¶ 34 (5th Dist.)
- State v. Doty, 2019-Ohio-917, ¶ 14 (12th Dist.)
- State v. Nero, 56 Ohio St.3d 106, 108 (1990)