

OHIO COURT OF APPEALS, THIRD APPELLATE DISTRICT

State v. Holdcraft

2026-Ohio-61 · No. 3-25-10 · Decided January 12, 2026

SUMMARY

The Ohio Third District Court of Appeals reversed David L. Holdcraft’s sentence and remanded the case. The court held that the trial court violated R.C. 2929.19 and R.C. 2950.03 by failing to provide mandatory sex-offender registration notifications at sentencing, despite imposing concurrent life-without-parole sentences.

CASE DETAILS

COURT	Ohio Court of Appeals, Third Appellate District
WRITING FOR THE COURT	William R. Zimmerman, P.J.; Juergen A. Waldick, J.; John R. Willamowski, J.
JURISDICTION	Ohio Court of Appeals, Third Appellate District, Crawford County
DECIDED	January 12, 2026
DOCKET	3-25-10
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Holdcraft appealed his sentence from the Crawford County Court of Common Pleas, arguing that the trial court failed to provide the statutory notification of sex-offender registration duties at sentencing.
STANDARD OF REVIEW	Under R.C. 2953.08(G)(2), the appellate court reviews the sentence to determine whether clear and convincing evidence shows that the record does not support the trial court's statutory findings or that the sentence is otherwise contrary to law.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	David L. Holdcraft v. State of Ohio

TOPICS

- sentencing
- criminal procedure
- statutory interpretation
- appellate procedure
- standard of review

PRACTICE AREAS

- criminal law
- sentencing
- sex-offender registration
- appellate procedure

QUESTIONS PRESENTED

1. Whether a sentencing court must provide the R.C. 2950.03 sex-offender registration notification at the time of sentencing when the defendant is sentenced to life without parole under R.C. 2907.02(B).
2. Whether failure to provide that mandatory notification renders the sentence contrary to law and requires reversal.

HOLDINGS

1. A sentencing court must provide the mandatory R.C. 2950.03 notification of sex-offender registration duties at the time of sentencing even when the defendant is sentenced to life without parole under R.C. 2907.02(B).
2. The sentence was contrary to law because the trial court failed to provide the mandatory R.C. 2950.03 notification at sentencing.

KEY QUOTATIONS

“Because the court failed to provide the mandatory R.C. 2950.03 notification at the time of sentencing as expressly required by statute, and because R.C. 2929.19 contains no exception for a sentence of life without parole, Holdcraft’s sentence is contrary to law.” (¶ 9)

“Having found error prejudicial to the appellant herein in the particulars assigned and argued, we reverse the judgment of the trial court and remand for further proceedings consistent with this opinion.” (¶ 11)

FACTUAL BACKGROUND

Holdcraft pleaded guilty to three counts of rape under R.C. 2907.02(A)(1)(b) and (B) in exchange for dismissal of a gross-sexual-imposition count and an indictment in another case. The trial court sentenced him to three concurrent terms of life imprisonment without parole and classified him as a Tier III sex offender. Although the court made the classification, it expressly declined to explain the sex-offender reporting requirements at sentencing.

PROCEDURAL HISTORY

A Crawford County grand jury indicted Holdcraft on three counts of rape and one count of gross sexual imposition. He later pleaded guilty to the three rape counts under a negotiated agreement, and the trial court dismissed the remaining count and sentenced him to three concurrent terms of life imprisonment without parole. The trial court classified him as a Tier III sex offender but did not provide the required registration-duty notification at sentencing. The Ohio Court of Appeals sustained his sole assignment of error, reversed the sentence, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The cause was remanded for further proceedings consistent with the opinion, including compliance with the mandatory R.C. 2950.03 notification requirement.

CASES CITED

- State v. Marcum, 2016-Ohio-1002, ¶¶ 1, 22
- Cross v. Ledford, 161 Ohio St. 469 (1954), paragraph three of the syllabus
- State v. Kase, 2010-Ohio-2688, ¶ 23 (7th Dist.)
- State v. Hathaway, 2017-Ohio-6925, ¶ 5 (9th Dist.)

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