

COURT OF APPEALS OF OHIO, FOURTH APPELLATE DISTRICT,
LAWRENCE COUNTY

State v. Parks

2026-Ohio-1253 · No. Lawrence App. No. 23CA34 · Decided March 30, 2026

SUMMARY

The Ohio Fourth District Court of Appeals affirmed Charles R. Parks's convictions for trafficking in fentanyl-related compounds and cocaine. The court rejected Parks's claims that the trial court improperly denied his request for self-representation at trial and improperly denied his motion to suppress evidence discovered during a search of an apartment and surrounding area.

CASE DETAILS

COURT	Court of Appeals of Ohio, Fourth Appellate District, Lawrence County
WRITING FOR THE COURT	Kristy S. Wilkin; Abele, J.; Hess, J.
JURISDICTION	Ohio Court of Appeals, Fourth Appellate District, Lawrence County
DECIDED	March 30, 2026
DOCKET	Lawrence App. No. 23CA34
DISPOSITION	affirmed
PROCEDURAL POSTURE	Parks appealed his convictions and sentences from the Lawrence County Court of Common Pleas, arguing that the trial court improperly denied his request to represent himself at trial and improperly denied his motion to suppress.
STANDARD OF REVIEW	Denial of a pretrial request for self-representation is reviewed de novo. A motion to suppress presents a mixed question of law and fact: appellate courts defer to supported factual findings but review the application of law to those facts de novo.
PRECEDENTIAL VALUE	Published Ohio appellate opinion
PARTIES	Charles R. Parks v. State of Ohio

TOPICS

- right to counsel
- criminal procedure
- suppression of evidence
- fourth amendment
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court violated Parks's constitutional right to self-representation by denying his request to proceed pro se at trial.
2. Whether the trial court erred by denying Parks's motion to suppress drugs found in an outdoor weeded area beyond the apartment and in a bag initially believed to be discarded trash.

HOLDINGS

1. The trial court did not violate Parks's right to self-representation because, although his waiver was knowing and voluntary, his disruptive conduct during the suppression hearing demonstrated that he could not intelligently exercise the right in a manner consistent with an orderly and effective trial. His conduct resulted in forfeiture of the right to represent himself at trial.
2. The trial court properly denied the motion to suppress because Parks failed to establish a legitimate expectation of privacy in the weeded area or in the discarded-looking Goldfish cracker bag. The area was not shown to be Parks's property or the apartment's curtilage, and the bag was accessible to public observation and therefore not protected by the Fourth Amendment.

KEY QUOTATIONS

“The right of self-representation is not a license to abuse the dignity of the courtroom. Neither is it a license not to comply with relevant rules of procedural and substantive law.” (¶ 27)

“The curtilage is the area around a home that a resident may reasonably expect to enjoy the sanctity and privacy of the home.” (¶ 40)

FACTUAL BACKGROUND

A confidential informant purchased fentanyl from Parks at an Ironton apartment, and police later arrested Parks with drugs and marked buy money. Officers obtained a warrant to search the apartment and found suspected fentanyl and drug-trafficking scales inside. Based on information from a resident, officers searched an outdoor weeded area approximately 51 feet from the apartment patio and found a Goldfish cracker bag containing cocaine/crack and fentanyl. During a prior suppression hearing, Parks became disruptive and directed abusive language toward the court and jurors; the trial court later denied his request to represent himself at trial.

PROCEDURAL HISTORY

Parks was indicted on seven drug- and forfeiture-related counts after a controlled buy, his arrest, and a search of an apartment and surrounding property. The trial court denied his motion to suppress, denied his request to represent himself at trial, and appointed counsel to represent him. A jury convicted him on six counts, acquitted him on one, and the trial court imposed consecutive prison terms. The Fourth District overruled both assignments of error and affirmed.

DISPOSITION

affirmed

CASES CITED

- *Faretta v. California*, 422 U.S. 806, 807, 819-821, 834 n.46 (1975)
- *State v. Gibson*, 45 Ohio St. 2d 366, 377 (1976)
- *State v. Hundley*, 2020-Ohio-3775, ¶¶ 97, 103
- *State v. Neyland*, 2014-Ohio-1914, ¶ 72
- *State v. Mizell*, 2008-Ohio-4907, ¶¶ 29-35 (1st Dist.)
- *State v. Dennis*, 79 Ohio St. 3d 421, 426 (1997)
- *United States v. Dunn*, 480 U.S. 294, 301 (1987)
- *United States v. Trice*, 966 F.3d 506, 513, 515 (6th Cir. 2020)
- *California v. Greenwood*, 486 U.S. 35, 40, 42 (1988)
- *State v. Payne*, 104 Ohio App. 3d 364, 367 (12th Dist. 1995)
- *State v. Lucas*, 2025-Ohio-1918, ¶ 30 (4th Dist.)
- *State v. Billiter*, 2025-Ohio-4693, ¶ 72 (4th Dist.)
- *Adams v. United States ex rel. McCann*, 317 U.S. 269, 279 (1942)
- *State v. Tilley*, 2018-Ohio-2922, ¶¶ 11, 13 (4th Dist.)
- *State v. Bristow*, 2009-Ohio-523, ¶ 12 (4th Dist.)
- *State v. Mootispaw*, 2010-Ohio-4772, ¶ 18 (4th Dist.)
- *State v. Phillips*, 2019-Ohio-2930, ¶ 19 (10th Dist.)
- *State v. Williams*, 2024-Ohio-2146, ¶ 16 (4th Dist.)
- *State v. Burnside*, 2003-Ohio-5372, ¶ 8
- *State v. Ash*, 2015-Ohio-4974, ¶ 10 (4th Dist.)
- *Oliver v. United States*, 466 U.S. 170, 180 (1984)
- *State v. Bonner*, 2024-Ohio-4717, ¶ 13 (6th Dist.)
- *State v. Renner*, 2003-Ohio-6550, ¶¶ 7-11 (12th Dist.)
- *State v. Coleman*, 45 Ohio St. 3d 298, 306 (1989)

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