

COURT OF APPEALS OF OHIO, SECOND APPELLATE DISTRICT, CLARK COUNTY

State v. Jennings

2026-Ohio-2105 · No. 2025-CA-26 · Decided June 5, 2026

SUMMARY

The Ohio Second District Court of Appeals affirmed Landan Jennings’s conviction and indefinite prison sentence following his guilty plea to permitting child abuse resulting in the death of his four-month-old son. The court held that the trial court’s plea colloquy did not completely fail to comply with Ohio Criminal Rule 11 and that Jennings failed to demonstrate prejudice, and further concluded that the sentence was within the statutory range and not contrary to law.

CASE DETAILS

COURT	Court of Appeals of Ohio, Second Appellate District, Clark County
WRITING FOR THE COURT	Ronald C. Lewis, Presiding Judge; Huffman, Judge; Hanseman, Judge
JURISDICTION	Ohio Court of Appeals, Second Appellate District, Clark County
DECIDED	June 5, 2026
DOCKET	2025-CA-26
DISPOSITION	affirmed
PROCEDURAL POSTURE	Jennings appealed his conviction and sentence in the Clark County Common Pleas Court after entering a negotiated guilty plea to one count of permitting child abuse.
STANDARD OF REVIEW	For the guilty-plea challenge, the court applied the standards governing compliance with Ohio Crim.R. 11: strict compliance for constitutional rights, and substantial compliance with a prejudice requirement for nonconstitutional matters unless the trial court completely failed to comply. For felony sentencing, the court applied R.C. 2953.08(G)(2), reviewing whether the sentence was clearly and convincingly unsupported by the record or contrary to law; because no specified findings under R.C. 2953.08(G)(2)(a) were involved, the court considered only whether the sentence was contrary to law.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Landan Jennings v. State of Ohio

TOPICS

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QUESTIONS PRESENTED

1. Whether Jennings's guilty plea was not knowing, intelligent, and voluntary because the trial court did not orally advise him of the effect of a guilty plea under Ohio Crim.R. 11(B)(1) and (C)(2)(b).
2. Whether the prosecutor improperly relied during sentencing on evidence allegedly outside the record.
3. Whether Jennings's sentence was contrary to law under R.C. 2953.08(G)(2).

HOLDINGS

1. The trial court did not completely fail to comply with Crim.R. 11(C)(2)(b). Although it did not orally use the language of Crim.R. 11(B)(1), Jennings reviewed and signed a plea form stating that by pleading guilty he admitted committing the offense and the facts in the indictment.
2. Jennings was required to demonstrate prejudice and failed to do so; the record established that his guilty plea was knowing, intelligent, and voluntary.
3. The prosecutor's sentencing argument concerning the child's injuries was not improper because the injuries were documented in the presentence investigation materials and other record evidence, and the argument responded to Jennings's attempt to minimize responsibility.
4. Jennings's sentence was not contrary to law because it fell within the authorized statutory range and the trial court considered the purposes and principles of sentencing and the seriousness and recidivism factors.

KEY QUOTATIONS

“Because Crim.R. 11(C)(2)(a) and (b) relate to nonconstitutional issues, when a trial court fails to fully cover these aspects of the plea colloquy, “a defendant must affirmatively show prejudice to invalidate a plea.”” (¶ 8)

“The trial court has full discretion to impose any sentence within the authorized statutory range, and the court is not required to make any findings or give its reasons for imposing maximum or more than minimum sentences.” (¶ 16)

“Among other things, a court may consider hearsay evidence, prior arrests, facts supporting a charge that resulted in an acquittal, and facts related to a charge that was dismissed under a plea agreement.” (¶ 20)

FACTUAL BACKGROUND

The charges arose from the death of Jennings's four-month-old son. Jennings ultimately pleaded guilty to permitting child abuse, a first-degree felony, while the remaining charges were dismissed. The presentence

investigation materials documented extensive injuries to the child, and the trial court imposed an indefinite sentence of 11 to 16.5 years.

PROCEDURAL HISTORY

A Clark County grand jury indicted Jennings on two counts of murder and counts of felonious assault, endangering children, and permitting child abuse. After a not-guilty-by-reason-of-insanity plea and competency examination, Jennings was found competent. He entered a negotiated guilty plea to permitting child abuse in exchange for dismissal of the remaining counts, with no sentencing agreement. The trial court imposed an indefinite prison term of 11 to 16.5 years, and the appellate court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Perdue, 2022-Ohio-722, ¶ 10, 12 (2d Dist.)
- Boykin v. Alabama, 395 U.S. 238 (1969)
- State v. Griggs, 2004-Ohio-4415, ¶ 12
- State v. Jones, 2007-Ohio-6093, ¶ 51
- State v. Dangler, 2020-Ohio-2765, ¶¶ 14, 16
- State v. Veney, 2008-Ohio-5200, ¶ 17
- State v. Nero, 56 Ohio St.3d 106, 108 (1990)
- State v. Brown, 2007-Ohio-6675, ¶ 4 (2d Dist.)
- State v. Clark, 2008-Ohio-3748, ¶ 31
- State v. Worthen, 2021-Ohio-2788, ¶ 13 (2d Dist.)
- State v. Huffman, 2017-Ohio-4097, ¶ 6 (2d Dist.)
- State v. King, 2013-Ohio-2021, ¶ 45 (2d Dist.)
- State v. Mathis, 2006-Ohio-855, ¶ 38
- State v. Jones, State v. Jones, 2020-Ohio-6729, ¶ 42
- State v. Bartley, 2023-Ohio-2325, ¶ 9 (2d Dist.)
- State v. Dorsey, 2021-Ohio-76, ¶ 18
- State v. Bowser, 2010-Ohio-951, ¶¶ 13, 15-16 (2d Dist.)
- State v. Bodkins, 2011-Ohio-1274, ¶ 43 (2d Dist.)