

OHIO FIRST DISTRICT COURT OF APPEALS

State v. Pitts

2026-Ohio-2306 · No. C-250584 · Decided June 18, 2026

SUMMARY

The Ohio First District Court of Appeals affirmed Sarah R. Pitts's conviction for assault following a bench trial in Hamilton County Municipal Court. The court held that the State disproved self-defense, finding that Pitts was the initial aggressor and that the trial court's credibility determinations and findings were supported by the record.

CASE DETAILS

COURT	Ohio First District Court of Appeals
WRITING FOR THE COURT	Presiding Judge Zayas; Judge Nestor; Judge Moore
JURISDICTION	Ohio First District Court of Appeals, Hamilton County
DECIDED	June 18, 2026
DOCKET	C-250584
DISPOSITION	affirmed
PROCEDURAL POSTURE	Criminal appeal from a bench-trial conviction for assault in the Hamilton County Municipal Court. The defendant argued that the State failed to disprove her claim of self-defense.
STANDARD OF REVIEW	A claim that the State failed to disprove self-defense is reviewed under the manifest-weight standard. The appellate court reviews the entire record, weighs the evidence and reasonable inferences, considers witness credibility, and determines whether the factfinder clearly lost its way and created a manifest miscarriage of justice.
PRECEDENTIAL VALUE	Published opinion; precedential under applicable Ohio appellate rules.
PARTIES	Sarah R. Pitts v. State of Ohio

TOPICS

- self defense
- criminal procedure
- appellate procedure
- standard of review
- evidence

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate law

QUESTIONS PRESENTED

1. Whether the trial court's finding that Pitts was guilty of assault was against the manifest weight of the evidence because the State failed to disprove her claim of self-defense.

HOLDINGS

1. The trial court did not err in finding that Pitts was the initial aggressor and that the State disproved self-defense beyond a reasonable doubt. A defendant who voluntarily enters or initiates a confrontation and advances toward the alleged victim cannot rely on self-defense to justify the use of force.
2. The conviction was not against the manifest weight of the evidence because the trial court was entitled to resolve conflicting testimony in favor of the victim and did not clearly lose its way.

KEY QUOTATIONS

“In reviewing a manifest-weight challenge, an appellate court reviews the entire record, weighs the evidence and all of the reasonable inferences, considers the credibility of witnesses, and determines whether in resolving conflicts in the evidence, the factfinder “clearly lost its way and created such a manifest miscarriage of justice that the conviction must be reversed and a new trial ordered.”” (¶ 27)

“In a case involving the use of nondeadly force, an accused is justified in using force against another if (1) she was not at fault in creating the situation giving rise to the altercation and (2) she had reasonable grounds to believe and an honest belief, even though mistaken, that she was in imminent danger of bodily harm and her only means to protect herself from the danger was by the use of force not likely to cause death or great bodily harm.” (¶ 29)

“A person may not provoke an assault or voluntarily enter an encounter and then claim a right of self-defense.” (¶ 30)

“ “[A] defendant voluntarily participating in or initiating a confrontation, especially for purposes other than protection, cannot justify or excuse” her use of force.” (¶ 34)

FACTUAL BACKGROUND

Pitts entered her former girlfriend R.N.'s home through an unlocked door and went upstairs to a bedroom where R.N. was with her new girlfriend. Pitts was angry and repeatedly demanded that the new girlfriend leave, then advanced toward her and picked up a heavy metal fan. The new girlfriend testified that Pitts swung the fan at her, causing arm pain, and that she acted defensively; photographs and police testimony supported the existence of injuries. Pitts disputed striking the victim and claimed the victim kicked her first, but the trial court credited the victim's testimony and found Pitts to be the initial aggressor.

PROCEDURAL HISTORY

Pitts was charged with assault, menacing, and domestic violence and proceeded to a bench trial after pleading not guilty. The municipal court dismissed the menacing and domestic-violence charges for lack of evidence but found Pitts guilty of assault. The First District Court of Appeals affirmed the judgment.

DISPOSITION

affirmed

CASES CITED

- State v. Nichols, 2025-Ohio-1515, ¶ 18 (1st Dist.)
- State v. Mitchell, 2023-Ohio-2604, ¶ 13 (1st Dist.)
- State v. Smiley, 2025-Ohio-2666, ¶ 19 (5th Dist.)
- State v. Thompson, 78 Ohio St.3d 380, 387 (1997)
- State v. Rose, 2024-Ohio-5689, ¶ 23 (1st Dist.)
- In re J.C., 2019-Ohio-4027, ¶ 20 (1st Dist.)
- State v. Ridley, 2022-Ohio-2561, ¶ 15 (1st Dist.)
- State v. Smith, 2026-Ohio-1262, ¶ 39 (1st Dist.)
- State v. Nichols, 2025-Ohio-1515, ¶ 25 (1st Dist.)
- State v. Rose, 2024-Ohio-5689, ¶ 28 (1st Dist.)
- State v. Smith, 2021-Ohio-1185, ¶ 23 (8th Dist.)
- State v. Patterson, 2025-Ohio-280, ¶ 41 (10th Dist.)
- State v. Ellis, 2012-Ohio-3586, ¶ 15 (10th Dist.)
- State v. Walker, 2021-Ohio-2037, ¶ 19 (8th Dist.)
- State v. Nichols, 2025-Ohio-1515, ¶ 27 (1st Dist.)