

OHIO COURT OF APPEALS, THIRD APPELLATE DISTRICT, ALLEN
COUNTY

State v. Bratton

2025-Ohio-5683 · No. 1-25-27 · Decided December 22, 2025

SUMMARY

The Ohio Third District Court of Appeals affirmed Lachmond Bratton’s misdemeanor conviction for violating a protection order after a no-contest plea. The court held that the prosecution’s explanation of circumstances sufficiently established the offense under Ohio Revised Code § 2919.27(A)(1) and Ohio Revised Code § 2937.07.

CASE DETAILS

COURT	Ohio Court of Appeals, Third Appellate District, Allen County
WRITING FOR THE COURT	Juergen A. Waldick; Mark C. Miller; John R. Willamowski
JURISDICTION	Ohio Court of Appeals, Third Appellate District, Allen County
DECIDED	December 22, 2025
DOCKET	1-25-27
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed his Lima Municipal Court conviction for violating a protection order after entering a no contest plea, arguing that the State's explanation of circumstances was insufficient to establish the offense.
STANDARD OF REVIEW	De novo review applies to a trial court's finding of guilt following a no contest plea.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Lachmond Bratton v. State of Ohio

TOPICS

- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate practice

QUESTIONS PRESENTED

1. Whether the explanation of circumstances following Bratton's misdemeanor no contest plea sufficiently established the elements of violating a protection order under R.C. 2919.27(A)(1).
2. Whether the State's explanation sufficiently established the existence of a protection order, a violation of its terms, Bratton's identity as the violator, and the requisite reckless mental state.

HOLDINGS

1. The explanation of circumstances was not insufficient. It adequately indicated that a protection order was in place, that Bratton violated one or more of its terms, and that his repeated responses to six emails supported an inference that he acted at least recklessly.

KEY QUOTATIONS

“The answer is that the explanation-of-circumstances requirement exists to provide an extra layer of procedural protection to the defendant.” (¶ 7)

“Therefore, we find that the State’s “explanation of circumstances” was not insufficient in this matter.” (¶ 14)

FACTUAL BACKGROUND

Bratton was charged with recklessly violating a protection order. The alleged victim stated that, after obtaining a protection order, she received six emails from Bratton containing emojis in response to emails she had sent before the protection order was issued. At the change-of-plea hearing, the State explained that the victim received the emails at her Lima, Ohio residence and that Bratton's communications therefore implicated Allen County jurisdiction.

PROCEDURAL HISTORY

A complaint charged Bratton with violating Ohio Revised Code section 2919.27(A)(1), a first-degree misdemeanor. After Bratton entered a no contest plea, a prosecution intern recited an explanation of circumstances, and the Lima Municipal Court found him guilty and sentenced him to 90 days in jail, with 80 days suspended. The Ohio Court of Appeals affirmed the judgment and remanded solely for execution of the judgment for appellate costs.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The matter is remanded to the Lima Municipal Court solely for execution of the judgment for appellate costs and issuance of the mandate under App.R. 27 and service under App.R. 30.

CASES CITED

- State v. Worthen, 2025-Ohio-2293

- State v. Hudson, 2013-Ohio-647
- Girard v. Giordano, 2018-Ohio-5024
- State v. Bird, 81 Ohio St.3d 582, 692 N.E.2d 1013 (1998)
- Seven Hills v. McKernan, 2019-Ohio-1001
- State v. Schuster, 2023-Ohio-3038
- State v. Wisler, 2019-Ohio-2363

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