OREGON COURT OF APPEALS

State v. O. A. M. A.

350 Or. App. 493 (2026) · No. A183229 · Decided June 10, 2026

SUMMARY

The Oregon Court of Appeals affirmed a juvenile court’s supplemental judgment awarding State Farm Insurance $12,808.98 in restitution for losses arising from a jewelry theft. The court held that the juvenile court did not plainly err by awarding restitution to State Farm even though the insurer was not specifically identified before adjudication, and it rejected the youth’s timeliness argument under ORS 419C.450(1)(a). The court also held that the youth invited any evidentiary error concerning surveillance video by having counsel play and rely on the video at the restitution hearing.

CASE DETAILS

COURT	Oregon Court of Appeals
WRITING FOR THE COURT	Hellman, J.; Ortega, Presiding Judge; Joyce, Judge; Hellman, Judge
JURISDICTION	Oregon Court of Appeals
DECIDED	June 10, 2026
DOCKET	A183229
DISPOSITION	affirmed
PROCEDURAL POSTURE	Youth appealed a supplemental juvenile-court judgment awarding State Farm Insurance $12,808.98 in restitution. The Oregon Court of Appeals rejected both assignments of error and affirmed.
STANDARD OF REVIEW	Restitution orders are reviewed for legal error, with the juvenile court's factual findings binding if supported by any evidence in the record. Statutory interpretation is reviewed for legal error. Unpreserved assignments are reviewed for plain error, requiring an error of law that is obvious, not reasonably in dispute, and apparent on the face of the record without choosing among competing inferences.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	O. A. M. A. v. State of Oregon

TOPICS

restitution · appellate procedure · preservation of error · statutory interpretation · evidence

PRACTICE AREAS

juvenile delinquency · restitution · appellate procedure · statutory interpretation · evidence

QUESTIONS PRESENTED

1. Whether the juvenile court plainly erred under ORS 419C.450(1)(a) by awarding restitution to State Farm when the state did not specifically identify State Farm as a victim before or at the time of adjudication.
2. Whether the juvenile court erred by relying on surveillance video that was never formally admitted into evidence to find that youth acted in concert with the other participants and was liable for the full loss.

HOLDINGS

1. The juvenile court did not plainly err by awarding restitution to State Farm because it was not obvious or beyond reasonable dispute that ORS 419C.450(1)(a) required the state to specifically identify the insurer as a victim before or at the time of adjudication.
2. Youth could not obtain reversal based on the juvenile court's reliance on the surveillance video because youth's counsel played the video and affirmatively relied on it to support youth's own restitution argument, thereby inviting any error.

KEY QUOTATIONS

> *"For an error to be plain, it must be an error of law, obvious and not reasonably in dispute, and apparent on the face of the record without requiring us to choose among competing inferences."* (at 498)

> *"We nevertheless question whether the state can comply with its obligation to present evidence prior to adjudication about the "nature and amount of the injury, loss or damage" under ORS 419C.450(1)(a) without identifying the victim who has suffered that injury."* (at 502)

> *"Under the invited error doctrine, "a party who was actively instrumental in bringing about an alleged error cannot be heard to complain, and the case ought not to be reversed because of it.""* (at 503)

FACTUAL BACKGROUND

Youth admitted stealing jewelry worth more than $1,000 from a kiosk at Washington Square Mall. The kiosk owner testified that the total value of the stolen jewelry was $13,808.98, that she paid a $1,000 insurance deductible, and that State Farm covered the remaining $12,808.98. During the restitution hearing, youth's counsel played surveillance video and argued that youth should be liable only for the $1,470 value of one bracelet display, while the juvenile court found that youth acted in concert with the other participants and imposed restitution for the full loss.

PROCEDURAL HISTORY

The juvenile court accepted youth's admission to first-degree theft, proceeded to disposition, and later conducted a restitution hearing. It entered supplemental judgments requiring youth to pay $1,000 to the kiosk owner and $12,808.98 to State Farm Insurance. The appeal initially challenged both judgments, but the appeal concerning the $1,000 judgment was severed and dismissed, leaving only the State Farm restitution judgment before the court.

DISPOSITION

affirmed

CASES CITED

- State v. R. D. M., 330 Or. App. 692, 694, 544 P.3d 425 (2024)
- State v. Vanornum, 354 Or. 614, 629, 317 P.3d 889 (2013)
- State v. M. A. S., 302 Or. App. 687, 691-92, 701, 705-06, 462 P.3d 284 (2020)
- State v. L. G. S.-S., 307 Or. App. 208, 209-12, 475 P.3d 922 (2020)
- State v. Johnson, 329 Or. App. 57, 63, 540 P.3d 73 (2023)
- State v. Kammeyer, 226 Or. App. 210, 214, 203 P.3d 274, rev. denied, 346 Or. 590 (2009)