

OHIO COURT OF APPEALS, NINTH JUDICIAL DISTRICT

State v. Hill

2026-Ohio-1840 · No. C.A. No. 31636 · Decided May 20, 2026

SUMMARY

Christopher Hill appealed the Summit County Court of Common Pleas judgment finding him to be a sexually violent predator. The Ninth District Court of Appeals held that the trial court did not exceed the scope of the parties’ stipulation regarding the authenticity of documentary exhibits and that Hill forfeited his evidentiary relevance and prejudice arguments by failing to raise them at trial. The court overruled both assignments of error and affirmed the judgment.

CASE DETAILS

COURT	Ohio Court of Appeals, Ninth Judicial District
WRITING FOR THE COURT	Jennifer Hensal; Carr, P.J.; Sutton, J.
JURISDICTION	Ohio Court of Appeals, Ninth Judicial District
DECIDED	May 20, 2026
DOCKET	C.A. No. 31636
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hill appealed the Summit County Court of Common Pleas judgment finding him guilty of sexually violent predator specifications associated with two gross-sexual-imposition offenses.
STANDARD OF REVIEW	Unpreserved evidentiary and relevance objections are reviewed only for plain error. The court also noted that a challenge to the weight assigned to admitted documents would be a manifest-weight argument, but Hill did not assign or develop such an argument.
PRECEDENTIAL VALUE	Published opinion; precedential within the Ninth District subject to applicable Ohio law.
PARTIES	Christopher Hill v. State of Ohio

TOPICS

- evidence
- appellate procedure
- preservation of error
- relevance
- criminal procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court improperly broadened Hill's stipulation to the authenticity of three exhibits by using the documents for substantive purposes in determining the sexually violent predator specifications.
2. Whether the trial court plainly erred or abused its discretion by admitting and relying on allegedly temporally irrelevant and prejudicial evidence under Ohio Evidence Rules 402 and 403.

HOLDINGS

1. The trial court did not misunderstand, misuse, or extend the parties' stipulation. The stipulation concerned the documents' authenticity, and the court properly reviewed the admitted documents and assessed the credibility and weight of the information they contained.
2. Hill forfeited his arguments that the exhibits were irrelevant or more prejudicial than probative by failing to raise them in the trial court, and he did not develop a plain-error argument on appeal. The court therefore declined to create a plain-error argument for him and overruled the assignment of error.

KEY QUOTATIONS

“This Court will not create a manifest weight argument on Mr. Hill’s behalf.” (§ 7)

“Mr. Hill has not developed a plain error argument, however, and we decline to create one for him.” (§ 9)

FACTUAL BACKGROUND

Hill pleaded guilty to two underlying gross-sexual-imposition offenses and tried the associated sexually violent predator specifications to the bench. He stipulated only to the authenticity of three exhibits: a 2013 conviction judgment for pandering obscenity involving a minor, a 2013 sex-offender risk assessment, and a 2023 behavioral-care-center letter stating that he had not successfully completed treatment. Relying on the exhibits and the information they contained concerning Hill's prior sexual offenses and risk of reoffending, the trial court found him guilty of the specifications.

PROCEDURAL HISTORY

A grand jury indicted Hill on three counts of gross sexual imposition, each with a sexually violent predator specification. After the State dismissed one count, Hill pleaded guilty to the underlying offenses on the other two counts and elected to try the specifications to the bench. The trial court admitted three exhibits based on Hill's stipulation to their authenticity, found him guilty of the specifications, and the Ninth District affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Foster, 2024-Ohio-4657, ¶ 16 (9th Dist.)

- State v. Jenkins, 2018-Ohio-4814, ¶ 24 (9th Dist.)
- State v. Mauricio, 2025-Ohio-5088, ¶ 14

OPINION

PER CURIAM.

[Cite as State v. Hill, 2026-Ohio-1840.] STATE OF OHIO) IN THE COURT OF APPEALS)ss:
NINTH JUDICIAL DISTRICT COUNTY OF SUMMIT) STATE OF OHIO C.A. No. 31636
Appellee v. APPEAL FROM JUDGMENT ENTERED IN THE CHRISTOPHER HILL COURT
OF COMMON PLEAS COUNTY OF SUMMIT, OHIO Appellant CASE No. CR-2024-12-3978
DECISION AND JOURNAL ENTRY Dated: May 20, 2026 HENSAL, Judge. {¶1} Christopher
Hill appeals a judgment of the Summit County Court of Common Pleas that determined he is a
sexually violent predator.

For the following reasons, this Court affirms. I. {¶2} The Grand Jury indicted Mr. Hill on three
counts of gross sexual imposition. Each count also included a sexually violent predator
specification. After the State dismissed one of the counts, Mr. Hill pleaded guilty to the underlying
offense on the other two counts and elected to have the specifications tried to the bench. {¶3} At
trial, the State did not call any witnesses but presented three exhibits after Mr. Hill stipulated as to
their authenticity.

The exhibits were a judgment entry of Mr. Hill's 2013 conviction for pandering obscenity
involving a minor, a 2013 assessment regarding Mr. Hill's sex offender risk, and a 2023 letter by a
behavioral care center indicating that Mr. Hill had failed to successfully complete his treatment
there after being released from prison. Based on these 2 documents, the trial court found Mr. Hill
guilty of the sexually violent predator specifications.

Mr. Hill has appealed, assigning two errors. II. ASSIGNMENT OF ERROR I THE TRIAL
COURT COMMITTED PLAIN ERROR BY MISUNDERSTANDING AND MISUSING
EXHIBIT 3 AND EXTENDING ITS CONTENTS BEYOND THE EXPRESSLY LIMITED
STIPULATION. {¶4} In his first assignment of error, Mr. Hill argues that the trial court
incorrectly went beyond the scope of his stipulation when it used the submitted documents to
determine that he is a sexually violent predator.

According to Mr. Hill, the stipulation was limited to the authenticity of the documents. He argues
that the trial court should not have used the documents for substantive purposes because they were
unreliable and not within the limits of the stipulation. He also argues that the error was plain. {¶5}
At trial, the court confirmed that Mr. Hill was stipulating to the authenticity of the documents and
nothing beyond their "me[re] authenticity...." When the State submitted the documents into
evidence, Mr. Hill did not object to their admission.

In its decision, the trial court reviewed the criteria for the sexually violent predator classification. It noted that Mr. Hill had previously been convicted of a sexually oriented offense, it stated that it placed significant weight on Mr. Hill's commission of gross sexual imposition against his young daughter, and it noted that the 2023 report recounted Mr. Hill's admission to many sexual offenses over the years.

The court also noted that the victims of those offenses included family members, many children, and even animals. It further noted that the most recent recidivism assessment of Mr. Hill found him to be at high risk of re-offending and to present a significant risk of committing further sexual offenses against children. 3 ¶6 The trial court's decision does not reflect that it improperly broadened the scope of the stipulation as to the documents' authenticity.

The court reviewed the documents and deemed them to provide a credible account of Mr. Hill's sexual offenses and his risk of re-offending. ¶7 To the extent that Mr. Hill's argument contends that the trial court should not have given the weight to the documents that it did, this is a manifest weight argument that he has not assigned as error or developed in his brief.

This Court will not create a manifest weight argument on Mr. Hill's behalf. *State v. Foster*, 2024-Ohio-4657, ¶ 16 (9th Dist.). Upon review of the record, we conclude that the trial court did not misunderstand, misuse, or extend the parties' stipulation. Mr. Hill's first assignment of error is overruled. ASSIGNMENT OF ERROR II THE TRIAL COURT ABUSED ITS DISCRETION BY ADMITTING AND RELYING UPON TEMPORALLY IRRELEVANT EVIDENCE, MISIDENTIFIED AS POST-2013, THEREBY VIOLATING EVID.R.

402 AND 403 AND MATERIALLY AFFECTING THE COURT'S JUDGMENT. ¶8 In his second assignment of error, Mr. Hill argues that, even though the authenticity of the exhibits was stipulated, the trial court should not have admitted them. He also argues that the court improperly interpreted the 2023 letter as reflecting events that occurred after the 2013 assessment. ¶9 Regarding whether the trial court should have admitted the exhibits, Mr. Hill argues that they were not relevant under Evidence Rule 402 and that they were more prejudicial than probative under Rule 403.

Because he did not make these arguments at trial, he has forfeited them and is limited to arguing plain error on appeal. *State v. Jenkins*, 2018-Ohio-4814, ¶ 24 (9th Dist.). Mr. Hill has not developed a plain error argument, however, and we decline to create one for him. *State v. Mauricio*, 2025-Ohio-5088, ¶ 14 (9th Dist.). Mr. Hill's second assignment of error is overruled.

4 III. ¶10 Mr. Hill's assignments of error are overruled. The judgment of the Summit County Court of Common Pleas is affirmed. Judgment affirmed. There were reasonable grounds for this appeal. We order that a special mandate issue out of this Court, directing the Court of Common Pleas, County of Summit, State of Ohio, to carry this judgment into execution.

A certified copy of this journal entry shall constitute the mandate, pursuant to App.R. 27. Immediately upon the filing hereof, this document shall constitute the journal entry of judgment, and it shall be file stamped by the Clerk of the Court of Appeals at which time the period for review shall begin to run. App.R. 22(C).

The Clerk of the Court of Appeals is instructed to mail a notice of entry of this judgment to the parties and to make a notation of the mailing in the docket, pursuant to App.R. 30. Costs taxed to Appellant. JENNIFER HENSAL FOR THE COURT CARR, P. J. SUTTON, J. CONCUR. 5 APPEARANCES: JESSICA MANUNGO, Assistant Public Defender, for Appellant. ELLIOT KOLKOVICH, Prosecuting Attorney, and C. RICHLEY RALEY, JR., Assistant Prosecuting Attorney, for Appellee.