

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

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