

COURT OF APPEALS OF OHIO, EIGHTH APPELLATE DISTRICT,
CUYAHOGA COUNTY

State v. Jackson

2026-Ohio-833 · No. 115167 · Decided March 12, 2026

SUMMARY

The Eighth District Court of Appeals of Ohio affirmed Jalen Jackson’s aggregate felony sentence arising from three Cuyahoga County criminal cases resolved through a global plea agreement. The court held that the sentence, which fell within the jointly recommended range and was authorized by law, was not subject to review under Ohio Revised Code 2953.08(D)(1).

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Timothy W. Clary; Michelle J. Sheehan; Emanuella D. Groves
JURISDICTION	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
DECIDED	March 12, 2026
DOCKET	115167
DISPOSITION	affirmed
PROCEDURAL POSTURE	Jackson appealed his felony sentences, arguing that the sentences were excessive, unsupported by the record, and contrary to law. The court addressed the merits despite the notice of appeal omitting one of the three consolidated criminal cases.
STANDARD OF REVIEW	Under R.C. 2953.08(D)(1), a sentence authorized by law, jointly recommended by the defendant and prosecution, and imposed by a sentencing judge is not subject to review under that section. The appellate court also has discretion under App.R. 3(A) and related rules to address an appeal despite procedural defects in the notice of appeal.
PRECEDENTIAL VALUE	Published and precedential Ohio Court of Appeals opinion
PARTIES	Jalen Jackson v. State of Ohio

TOPICS

- sentencing
- appellate procedure
- criminal procedure
- standard of review

PRACTICE AREAS

criminal law

criminal procedure

sentencing

appellate practice

QUESTIONS PRESENTED

1. Whether the Court of Appeals could address the merits when Jackson's notice of appeal omitted the case in which the most serious sentence was imposed.
2. Whether Jackson's sentence was reviewable as excessive, unsupported by the record, or contrary to law when it was authorized by law and fell within the jointly recommended sentencing range.

HOLDINGS

1. Because the three cases were resolved through a global plea agreement and the record contained the relevant plea and sentencing transcripts, the Court of Appeals exercised its discretion to address the merits notwithstanding the notice-of-appeal defect.
2. A sentence that is authorized by law, jointly recommended by the defendant and prosecution, and imposed by a sentencing judge is not subject to review under R.C. 2953.08(D)(1), even when the joint recommendation is expressed as a sentencing range rather than a specific term.

KEY QUOTATIONS

“Because the aggregate sentence imposed by the trial court falls within the jointly recommended sentence agreed to by the parties, Jackson’s sentence is not subject to review.” (¶ 10)

“R.C. 2953.08(D)(1) provides that “[a] sentence imposed upon a defendant is not subject to review under this section if the sentence is authorized by law, has been recommended jointly by the defendant and the prosecution in the case, and is imposed by a sentencing judge.”” (¶ 10)

“Jackson’s sentence was within the range the parties agreed to pursuant to the plea agreement and was authorized by law.” (¶ 16)

FACTUAL BACKGROUND

Jackson was charged in three criminal cases involving burglary, receiving stolen property, and offenses arising from an armed vehicle theft and subsequent fatal crash. He entered guilty pleas pursuant to a global plea agreement under which the parties jointly recommended a base-sentence range of 26 to 34 years, excluding the indefinite Reagan Tokes portion. The trial court imposed an aggregate sentence of 30 to 35 and one-half years, including consecutive sentences and firearm specifications.

PROCEDURAL HISTORY

Jackson was indicted in three Cuyahoga County criminal cases and resolved all three through a global plea agreement. The parties jointly recommended a base-sentence range of 26 to 34 years, and the trial court imposed an aggregate sentence of 30 to 35 and one-half years. Jackson appealed from the sentences in two of the three cases; the Court of Appeals exercised its discretion to reach the merits and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. King, 2023-Ohio-2390, ¶ 6 (8th Dist.)
- Perozeni v. Perozeni, 2023-Ohio-1140, ¶ 23
- State v. Cook, 2025-Ohio-2776, ¶ 10 (8th Dist.)
- State v. Curry, 2023-Ohio-1571, ¶ 16
- State v. Grant, 2018-Ohio-1759, ¶ 29
- State v. Bennett, 2023-Ohio-4412, ¶ 26
- State v. Porterfield, 2005-Ohio-3095, ¶ 25

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