

OHIO COURT OF APPEALS, SECOND APPELLATE DISTRICT

State v. Uchyn

2026-Ohio-58 · No. 2025-CA-4 · Decided January 9, 2026

SUMMARY

The Ohio Second District Court of Appeals affirmed Adam Uchyn's convictions for two counts of murder and one count of grand theft of a motor vehicle arising from the deaths of Michele Phipps and James Donnelly. The opinion recounts the investigation, trial evidence, forensic evidence, and Uchyn's self-defense-related testimony.

CASE DETAILS

COURT	Ohio Court of Appeals, Second Appellate District
WRITING FOR THE COURT	Mary K. Huffman; Tucker, J.; Hanseman, J.
JURISDICTION	Ohio Court of Appeals, Second Appellate District
DECIDED	January 9, 2026
DOCKET	2025-CA-4
DISPOSITION	affirmed
PROCEDURAL POSTURE	Adam Uchyn appealed convictions entered after a jury found him guilty of the lesser included offenses of two counts of murder and grand theft of a motor vehicle. He challenged the sufficiency of the evidence supporting both murder convictions and argued that the murder conviction for Donnelly's death was against the manifest weight of the evidence.
STANDARD OF REVIEW	For sufficiency of the evidence, the court examines the evidence admitted at trial in the light most favorable to the prosecution and asks whether any rational trier of fact could have found the essential elements proven beyond a reasonable doubt. Sufficiency is a question of law. For manifest weight, the court reviews the entire record, weighs the evidence and reasonable inferences, considers witness credibility, and determines whether the jury clearly lost its way and created a manifest miscarriage of justice. The appellate court gives substantial deference to the factfinder's credibility determinations.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Adam J. Uchyn v. State of Ohio

TOPICS

criminal procedure

appellate procedure

standard of review

evidence

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

QUESTIONS PRESENTED

1. Whether Uchyn waived appellate review of the sufficiency of the evidence supporting his conviction for Phipps's murder by failing to renew his Crim.R. 29 motion for acquittal at the close of all evidence.
2. Whether, even if preserved, sufficient evidence supported Uchyn's conviction for purposely causing Phipps's death.
3. Whether sufficient evidence supported Uchyn's conviction for Donnelly's murder.
4. Whether the conviction for Donnelly's murder was against the manifest weight of the evidence because the jury rejected Uchyn's claim that he was provoked into committing voluntary manslaughter.

HOLDINGS

1. By failing to renew his Crim.R. 29 motion for acquittal at the close of all evidence, Uchyn waived his argument that the evidence was insufficient to support his conviction for Phipps's murder.
2. Even if preserved, sufficient evidence supported the finding that Uchyn purposely caused Phipps's death.
3. Sufficient evidence supported Uchyn's conviction for Donnelly's murder.
4. The conviction for Donnelly's murder was not against the manifest weight of the evidence, notwithstanding Uchyn's claim that he acted under sudden passion or rage caused by Donnelly's killing of Phipps.

KEY QUOTATIONS

“An appellate court’s function when reviewing the sufficiency of the evidence to support a criminal conviction is to examine the evidence admitted at trial to determine whether such evidence, if believed, would convince the average mind of the defendant’s guilt beyond a reasonable doubt.” (¶ 59)

“A weight of the evidence argument, on the other hand, challenges the believability of the evidence and asks which of the competing inferences suggested by the evidence is more believable or persuasive.” (¶ 67)

“Because the factfinder . . . has the opportunity to see and hear the witnesses, the cautious exercise of the discretionary power of a court of appeals to find that a judgment is against the manifest weight of the evidence requires that substantial deference be extended to the factfinder’s determinations of credibility.” (¶ 69)

FACTUAL BACKGROUND

On April 13, 2023, Adam Uchyn was living in the Darke County home of Michele Phipps, where Phipps and James Donnelly also lived. After a 911 hang-up call from the residence, deputies encountered Uchyn outside; he

claimed that Donnelly had attacked him and fled with jewelry. Officers later entered the home and found Phipps and Donnelly dead from multiple sharp-force injuries. Physical, forensic, recorded, and text-message evidence connected Uchyn to the killings, and Uchyn ultimately admitted stabbing Donnelly but denied killing Phipps and claimed self-defense or provocation.

PROCEDURAL HISTORY

Uchyn was indicted in the Darke County Court of Common Pleas on two counts of aggravated murder and one count of aggravated robbery. After a jury trial, he was convicted of two counts of murder and grand theft of a motor vehicle. The trial court entered judgment after disposition on January 30, 2025. Uchyn timely appealed, and the Second District affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Goney, 2018-Ohio-2115, ¶¶ 71-72 (2d Dist.)
- State v. Zimpfer, 2014-Ohio-4401, ¶ 42 (2d Dist.)
- State v. Richardson, 2016-Ohio-8081, ¶ 16 (2d Dist.)
- State v. Witcher, 2007-Ohio-3960, ¶ 20 (6th Dist.)
- State v. Wilson, 2009-Ohio-525, ¶¶ 10, 12, 14-17 (2d Dist.)
- State v. Thompkins, 78 Ohio St.3d 380, 386, 390 (1997)
- State v. Jenks, 61 Ohio St.3d 259, paragraph two of the syllabus (1991)
- State v. Hufnagel, 1996 WL 501470, *3 (2d Dist. Sept. 6, 1996)
- State v. Martin, 20 Ohio App.3d 172, 175 (1st Dist. 1983)
- State v. Flores-Lopez, 2017-Ohio-690, ¶ 49 (2d Dist.)
- State v. McCrary, 2011-Ohio-3161, ¶ 11 (10th Dist.)
- State v. Robinson, 2015-Ohio-1167, ¶ 17 (2d Dist.)
- State v. Braxton, 2005-Ohio-2198, ¶ 15 (10th Dist.)
- State v. DeHass, 10 Ohio St.2d 230 (1967)
- State v. Lawson, 1997 WL 476684, *4 (2d Dist. Aug. 22, 1997)
- State v. Petty, 2012-Ohio-2989, ¶ 38 (10th Dist.)
- State v. Raver, 2003-Ohio-958, ¶ 21 (10th Dist.)
- State v. Wilson, 2007-Ohio-2202, ¶ 24 (10th Dist.)
- In re M.J.C., 2015-Ohio-820, ¶ 35 (12th Dist.)
- State v. Bradley, 1997 WL 691510, *4 (2d Dist. Oct. 24, 1997)