

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

State v. Crenshaw

2026-Ohio-186 · No. No. 115006 · Decided January 22, 2026

SUMMARY

The Ohio Eighth District Court of Appeals affirmed Raymond Crenshaw Jr.'s conviction for unlawful possession of dangerous ordnance and his six-and-one-half-year prison sentence. The court rejected his claim that trial counsel provided ineffective assistance by advising him to plead guilty under a misunderstanding of firearm-specification sentencing law. The court concluded that Crenshaw's plea was knowing, voluntary, and intelligent and that he failed to demonstrate deficient performance or prejudice.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Lisa B. Forbes; Michelle J. Sheehan; Deena R. Calabrese
JURISDICTION	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
DECIDED	January 22, 2026
DOCKET	No. 115006
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed his conviction and six-and-one-half-year prison sentence following a guilty plea to unlawful possession of dangerous ordnance with a six-year firearm specification, asserting ineffective assistance of counsel.
STANDARD OF REVIEW	The court applied the Strickland v. Washington ineffective-assistance standard, requiring proof of deficient performance and prejudice; in the guilty-plea context, prejudice required a reasonable probability that, but for counsel's deficient performance, the defendant would not have pleaded guilty and would have proceeded to trial.
PRECEDENTIAL VALUE	published opinion
PARTIES	Raymond Crenshaw, Jr. v. State of Ohio

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether trial counsel rendered ineffective assistance by advising Crenshaw to enter a plea agreement requiring sentencing on the six-year firearm specification.
2. Whether counsel's alleged advice made Crenshaw's guilty plea less than knowing, intelligent, and voluntary.
3. Whether Crenshaw demonstrated a reasonable probability that, absent counsel's alleged errors, he would have rejected the plea and proceeded to trial or would have received the lesser firearm specification.

HOLDINGS

1. A defendant who pleads guilty may establish ineffective assistance only by showing deficient performance that caused the plea to be less than knowing, intelligent, and voluntary, together with a reasonable probability that, but for counsel's deficient performance, the defendant would not have pleaded guilty and would instead have gone to trial.
2. A complete plea colloquy complying with Ohio Crim.R. 11(C) supported the conclusion that Crenshaw's guilty plea was knowing, intelligent, and voluntary.
3. Crenshaw failed to prove a reasonable probability that, absent the plea agreement, he would have been sentenced on the one-year firearm specification or that counsel's conduct would have changed the outcome.

KEY QUOTATIONS

“Where a defendant enters a guilty plea, he or she waives a claim of ineffective assistance of counsel except to the extent that the ineffective assistance of counsel caused the defendant’s plea to be less than knowing, intelligent, and voluntary.”

“Nothing in the record suggests that, absent the plea agreement, Crenshaw would have been sentenced on the one-year firearm specification.”

“Under these circumstances, Crenshaw has not demonstrated deficient performance.”

FACTUAL BACKGROUND

Crenshaw was charged with carrying a concealed weapon, unlawful possession of dangerous ordnance with one- and six-year firearm specifications, and obstructing official business. Under a plea agreement, he pleaded guilty to unlawful possession of dangerous ordnance with the six-year firearm specification, and the State dismissed the remaining charges and specifications. The trial court imposed a total prison term of six and one-half years. Crenshaw claimed counsel ineffectively advised him to accept an agreement requiring sentencing on the greater firearm specification rather than plead to the indictment and potentially receive the lesser specification.

PROCEDURAL HISTORY

Crenshaw was indicted on charges including carrying a concealed weapon, unlawful possession of dangerous ordnance with firearm specifications, and obstructing official business. He pleaded guilty to unlawful possession of dangerous ordnance with the six-year firearm specification; the State nolleed the remaining counts and specifications. The trial court imposed six years on the firearm specification and six months on the underlying offense, and the court of appeals affirmed.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The common pleas court is directed to execute the affirmed sentence. Any bail pending appeal is terminated, and a special mandate is to issue.

CASES CITED

- Strickland v. Washington, 466 U.S. 668 (1984)
- State v. Bradley, 42 Ohio St.3d 136 (1989)
- State v. Parham, 2018-Ohio-1631, ¶¶ 9, 32 (8th Dist.)
- State v. Williams, 2014-Ohio-3415, ¶ 11 (8th Dist.)
- State v. Xie, 62 Ohio St.3d 521, 524 (1992)
- Hill v. Lockhart, 474 U.S. 52 (1985)
- State v. Engle, 74 Ohio St.3d 525, 527 (1996)
- State v. Schmick, 2011-Ohio-2263, ¶ 5 (8th Dist.)
- State v. Holliman, 2025-Ohio-1187, ¶¶ 9-11 (8th Dist.)
- State v. Holliman, 2025-Ohio-2749