

OHIO COURT OF APPEALS, SECOND APPELLATE DISTRICT, MIAMI
COUNTY

State v. Shafer

2026-Ohio-1586 · No. 2025-CA-38 · Decided May 1, 2026

SUMMARY

The Ohio Second District Court of Appeals affirmed Tyler C. Shafer’s conviction for reckless operation following his negotiated guilty plea. The court rejected Shafer’s ineffective-assistance claim, concluding that the record did not show his plea was unknowing, unintelligent, or involuntary, and that matters outside the record could not be considered on direct appeal.

CASE DETAILS

COURT	Ohio Court of Appeals, Second Appellate District, Miami County
WRITING FOR THE COURT	Ronald C. Lewis, Presiding Judge; Tucker, Judge; Hanseman, Judge
JURISDICTION	Ohio Court of Appeals, Second Appellate District, Miami County
DECIDED	May 1, 2026
DOCKET	2025-CA-38
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from a conviction in the Miami County Municipal Court following a negotiated guilty plea to reckless operation. The appellant challenged the plea as involuntary based on alleged ineffective assistance of trial counsel.
STANDARD OF REVIEW	Ineffective-assistance-of-counsel claims are reviewed under the two-prong Strickland analysis, requiring deficient performance and resulting prejudice. On direct appeal, the reviewing court is limited to the record before the trial court and presumes regularity when the record lacks a transcript of the relevant proceedings.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Tyler C. Shafer v. State of Ohio

TOPICS

- ineffective assistance
- plea bargaining
- right to counsel
- appellate procedure
- criminal procedure

PRACTICE AREAS

criminal procedure

constitutional law

appellate procedure

ineffective assistance of counsel

plea validity

QUESTIONS PRESENTED

1. Whether Shafer established ineffective assistance of trial counsel that rendered his guilty plea less than knowing, intelligent, and voluntary.
2. Whether the court of appeals could consider alleged coercive communications or other evidence outside the appellate record on direct appeal.

HOLDINGS

1. Shafer failed to establish ineffective assistance of trial counsel or that his guilty plea was less than knowing, intelligent, and voluntary. The absence of the plea-hearing transcript required the court to presume regularity, and the written plea form indicated that Shafer had been advised of his rights and was satisfied with counsel's advice.
2. The court could not consider evidence outside the record, including alleged off-the-record events or conversations, to support Shafer's ineffective-assistance claim on direct appeal.

KEY QUOTATIONS

“A plea of guilty is a complete admission of guilt.” (¶ 7)

“The absence of a plea transcript requires us to presume the regularity of the proceedings in the trial court.” (¶ 8)

FACTUAL BACKGROUND

Shafer was cited and charged with having physical control of a vehicle while under the influence. He initially pleaded not guilty, then entered a negotiated guilty plea to the amended charge of reckless operation, a fourth-degree misdemeanor. The municipal court sentenced him to 30 days in jail, suspended 28 days pending probation conditions, ordered a drug and alcohol evaluation and follow-up, and imposed a \$100 fine. On appeal, Shafer alleged that his trial counsel pressured him into an involuntary guilty plea.

PROCEDURAL HISTORY

Shafer was initially charged with physical control of a vehicle while under the influence. He later entered a negotiated guilty plea to the amended charge of reckless operation, and the municipal court imposed a sentence including jail time, probation conditions, and a fine. Shafer appealed, asserting that counsel coerced his guilty plea; the court of appeals overruled the assignment of error and affirmed.

DISPOSITION

affirmed

CASES CITED

- Strickland v. Washington, 466 U.S. 668 (1984)
- State v. Bradley, 42 Ohio St.3d 136 (1989)
- State v. Davis, 2020-Ohio-309, ¶ 10
- State v. Stivender, 2011-Ohio-247, ¶ 15
- State v. Barnett, 73 Ohio App.3d 244 (2d Dist. 1991)
- State v. Tunstall, 2010-Ohio-4926, ¶ 12 (2d Dist.)
- State v. Ismail, 54 Ohio St.2d 402, 405-406 (1978)
- State v. King, 2024-Ohio-4705, ¶ 10 (2d Dist.)

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