

OHIO COURT OF APPEALS, TWELFTH DISTRICT, BUTLER COUNTY

State v. Rarden

2025-Ohio-5798 · No. CA2025-03-027; CA2025-03-028 · Decided December 30, 2025

SUMMARY

The Twelfth District Court of Appeals of Ohio affirmed the denial of Lonnie Rarden’s pro se motion for resentencing. The court held that the trial court had subject-matter jurisdiction under R.C. 2929.191 to conduct a 2010 hearing and correct the postrelease-control portion of Rarden’s sentence. The court concluded that Rarden’s argument concerning fines was moot.

CASE DETAILS

COURT	Ohio Court of Appeals, Twelfth District, Butler County
WRITING FOR THE COURT	Matthew R. Byrne, Presiding Judge; M. Powell, Judge; Melena S. Siebert, Judge
JURISDICTION	Ohio Court of Appeals, Twelfth District, Butler County
DECIDED	December 30, 2025
DOCKET	CA2025-03-027; CA2025-03-028
DISPOSITION	affirmed
PROCEDURAL POSTURE	Rarden appealed pro se from the Butler County Court of Common Pleas's denial of his motion for resentencing. He argued that the trial court lacked subject-matter jurisdiction to conduct a 2010 hearing correcting the postrelease-control portion of his sentence and that defects concerning fines prevented finality of the original judgment entries.
STANDARD OF REVIEW	The opinion does not expressly identify a separate standard of review. The court reviewed the trial court's ruling on the legal question of subject-matter jurisdiction and statutory authority de novo.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Lonnie Rarden v. State of Ohio

TOPICS

- criminal procedure
- post-conviction relief
- statutory interpretation
- appellate procedure
- final judgment rule

PRACTICE AREAS

Criminal law

Criminal procedure

Postconviction relief

Ohio appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court had subject-matter jurisdiction under R.C. 2929.191 to conduct the April 2010 hearing and issue corrected judgment entries addressing the erroneous imposition of postrelease control.
2. Whether alleged omissions concerning the imposition of an optional fine rendered the original sentencing entries nonfinal and required a de novo sentencing hearing.

HOLDINGS

1. R.C. 2929.191 remained viable after *State v. Harper* and *State v. Henderson* and authorized the trial court to conduct the April 2010 hearing and issue corrected judgment entries limited to the proper imposition of postrelease control. The trial court therefore possessed subject-matter jurisdiction, and the denial of Rarden's 2024 resentencing motion was proper.
2. The court did not reach the merits of the finality argument because, after affirming the trial court's jurisdiction to conduct the 2010 R.C. 2929.191 proceeding, the second assignment of error was moot.

KEY QUOTATIONS

"We find the reasoning of the First District persuasive and agree that R.C. 2929.191 remains viable following Harper." (¶ 21)

"For the foregoing reasons, we conclude that the trial court possessed subject-matter jurisdiction to hold the April 2010 R.C. 2929.191 hearing and therefore the trial court did not err in denying Rarden's December 2024 motion for resentencing." (¶ 25)

FACTUAL BACKGROUND

In 2006, a jury convicted Lonnie Rarden of multiple felonies and misdemeanors, and the trial court imposed a sentence of 26 and one-half years. The original sentencing court advised Rarden that postrelease control would be imposed but failed to advise him of the consequences of violating postrelease control. In 2010, pursuant to R.C. 2929.191, the court held a limited hearing and issued corrected entries addressing postrelease control. Rarden later challenged the trial court's authority to conduct that hearing and sought de novo resentencing.

PROCEDURAL HISTORY

Rarden was convicted and sentenced in 2006, and his conviction and sentence were affirmed on direct appeal. In 2010, the trial court conducted a hearing and issued corrected judgment entries under R.C. 2929.191 to properly impose postrelease control; that decision was also affirmed. In December 2024, Rarden sought de novo resentencing based on *State v. Harper* and *State v. Henderson*, but the common pleas court denied the motion on jurisdictional and res judicata grounds. The Court of Appeals affirmed, holding that the 2010 proceedings were authorized by R.C. 2929.191 and finding the second assignment of error moot.

DISPOSITION

affirmed

CASES CITED

- State v. Rarden, 12th Dist. Butler No. CA2007-03-077 (Apr. 21, 2008) (Accelerated Calendar Judgment Entry)
- State v. Rarden, 2018-Ohio-4487 (12th Dist.)
- State v. Rarden, 12th Dist. Butler Nos. CA2010-04-095, CA2010-05-106, and CA2010-05-126 (Feb. 7, 2011) (Accelerated Calendar Judgment Entry)
- State v. Harper, State v. Harper, 2020-Ohio-2913
- State v. Henderson, 2020-Ohio-4784
- State v. Brasher, 2021-Ohio-1688, ¶ 17 (12th Dist.)
- State ex rel. Romine v. McIntosh, 2020-Ohio-6826, ¶ 12
- State v. Singleton, 2009-Ohio-6434, ¶¶ 23-24
- State v. Harris, 2022-Ohio-3310 (1st Dist.)
- State v. Bates, 2022-Ohio-475, ¶ 30
- State v. Barnette, 2020-Ohio-6817, ¶¶ 19-20 (7th Dist.)
- Gauthier v. Gauthier, 2019-Ohio-4208, ¶ 70 (12th Dist.)
- In re Estate of Centorbi, 129 Ohio St.3d 78, 2011-Ohio-2267, 950 N.E.2d 505, ¶ 11
- Stetter v. R.J. Corman Derailment Servs., LLC, 125 Ohio St.3d 280, 2010-Ohio-1029, 927 N.E.2d 1092, ¶ 35
- State v. Delvallie, 2022-Ohio-470, 185 N.E.3d 536, ¶ 19 (8th Dist.)
- Central Motors Corp. v. Pepper Pike, 73 Ohio St.3d 581, 586-587, 653 N.E.2d 639 (1995)
- Gerijo v. Fairfield, 70 Ohio St.3d 223, 229, 638 N.E.2d 533 (1994)