

COURT OF APPEALS OF OHIO, SECOND APPELLATE DISTRICT, DARKE
COUNTY

State v. Ruhenkamp

2026-Ohio-1791 · No. 2025-CA-20 · Decided May 15, 2026

SUMMARY

The Ohio Second District Court of Appeals reversed Benjamin J. Ruhenkamp’s OVI and red-light violation convictions and remanded the matter for further proceedings. The court held that the traffic stop was unlawful because the officer lacked reasonable, articulable suspicion of a red-light violation when Ruhenkamp crossed the stop line while the signal was yellow, making the resulting OVI evidence subject to suppression as fruit of the poisonous tree.

CASE DETAILS

COURT	Court of Appeals of Ohio, Second Appellate District, Darke County
WRITING FOR THE COURT	Mary K. Huffman; Tucker, J.; Epley, J.
JURISDICTION	Ohio Court of Appeals, Second Appellate District, Darke County
DECIDED	May 15, 2026
DOCKET	2025-CA-20
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Ruhenkamp appealed his municipal-court convictions and sentence for operating a motor vehicle while under the influence and a red-light violation after the trial court denied his motion to suppress and accepted his no-contest pleas.
STANDARD OF REVIEW	A suppression ruling presents a mixed question of law and fact. The appellate court accepts factual findings supported by competent, credible evidence but independently reviews de novo the application of law to those facts.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Benjamin J. Ruhenkamp v. State of Ohio

TOPICS

- suppression of evidence
- fourth amendment
- search and seizure
- criminal procedure
- appellate procedure

PRACTICE AREAS

criminal procedure

constitutional criminal procedure

DUI/OVI defense

appellate litigation

QUESTIONS PRESENTED

1. Whether the officer had reasonable, articulable suspicion to stop Ruhenkamp's vehicle for a suspected red-light violation when the vehicle crossed the stop line while the signal was yellow.
2. Whether evidence obtained after the traffic stop, including evidence of the OVI offense, was subject to suppression as fruit of the poisonous tree.

HOLDINGS

1. The traffic stop was unlawful because the officer lacked reasonable, articulable suspicion that Ruhenkamp had violated Ohio's red-light laws. Ruhenkamp crossed the stop line while the signal was yellow, and no red-light violation occurred.
2. Evidence of the OVI offense obtained as a result of the unlawful traffic stop was fruit of the poisonous tree and was subject to suppression.

KEY QUOTATIONS

"Because the arresting officer lacked reasonable, articulable suspicion that a red-light violation had occurred, the evidence that flowed from the improper traffic stop was fruit of the poisonous tree, and the trial court erred in overruling Ruhenkamp's motion to suppress." (§ 1)

"Accordingly, a red-light violation did not occur, because Ruhenkamp crossed the stop line on a yellow light (as Gilbert conceded), and the stop was predicated on a mistake of law." (§ 14)

"The exclusionary rule bars the admission of evidence obtained as a result of a traffic stop based on conduct that a police officer mistakenly believed is a violation of the law." (§ 14)

FACTUAL BACKGROUND

Officer Aaron Gilbert observed Ruhenkamp's vehicle approach an intersection while the traffic signal changed from green to yellow to red. The vehicle had crossed the stop line while the signal was yellow and was beyond the stop line when the signal turned red; it nearly cleared the intersection before the officer's signal turned green. Gilbert nevertheless believed Ruhenkamp had committed a red-light violation and stopped the vehicle, leading to the OVI investigation and chemical testing.

PROCEDURAL HISTORY

Ruhenkamp was cited for two OVI offenses and a red-light violation, pleaded not guilty, and moved to suppress evidence. After two suppression hearings, the Darke County Municipal Court denied the motion. Ruhenkamp then pleaded no contest to OVI and the red-light violation, received sentence, and timely appealed. The Second District sustained his assignment of error, reversed the judgment, and remanded.

DISPOSITION

REMAND INSTRUCTIONS

The matter is remanded to the Darke County Municipal Court for further proceedings consistent with the opinion.

CASES CITED

- State v. Burnside, 2003-Ohio-5372, ¶ 8
- State v. Mills, 62 Ohio St.3d 357, 366 (1992)
- State v. Hawkins, 2019-Ohio-4210, ¶ 16
- State v. Isaac, 2005-Ohio-3733, ¶ 8 (2d Dist.)
- State v. Retherford, 93 Ohio App.3d 586 (2d Dist. 1994)
- State v. Turner, 2015-Ohio-4612, ¶ 10 (2d Dist.)
- State v. Mays, 119 Ohio St.3d 406, 2008-Ohio-4539, 894 N.E.2d 1204, ¶ 7
- State v. Orr, 91 Ohio St.3d 389, 391, 745 N.E.2d 1036 (2001)
- Heien v. North Carolina, 574 U.S. 54, 60, 135 S.Ct. 530, 190 L.Ed.2d 475 (2014)
- State v. Scott, 2022-Ohio-2071, ¶ 23 (6th Dist.)
- State v. Bullock, 2017-Ohio-497, ¶ 7 (12th Dist.)
- Terry v. Ohio, 392 U.S. 1 (1968)
- State v. Hairston, 2019-Ohio-1622, ¶ 10
- State v. Andrews, 57 Ohio St.3d 86, 88 (1991)
- United States v. Cortez, 449 U.S. 411, 417-418 (1981)
- State v. Jones, 70 Ohio App.3d 554, 556-557 (2d Dist. 1990)
- State v. Tidwell, 2021-Ohio-2072, ¶ 20
- Alabama v. White, 496 U.S. 325, 330 (1990)
- State v. McLemore, 2012-Ohio-521, ¶ 20 (2d Dist.)
- Nardone v. United States, 308 U.S. 338 (1939)
- Columbus v. Sharaf, 2002-Ohio-4502, ¶ 29 (10th Dist.)
- State v. Coleman, 2026-Ohio-203, ¶ 22 (2d Dist.)
- State v. Dowty, 2016-Ohio-4719, ¶ 16 (2d Dist.)
- State v. Reedy, 2012-Ohio-4899, ¶ 19 (5th Dist.)
- State v. Greer, 114 Ohio App.3d 299, 683 N.E.2d 82 (2d Dist. 1996)
- State v. Babcock, 2013-Ohio-2366, 992 N.E.2d 1215, ¶ 20 (6th Dist.)
- State v. Fears, 2011-Ohio-930, ¶ 12 (8th Dist.)
- State v. Drushal, 2014-Ohio-3088, ¶ 13 (9th Dist.)
- State v. Stadelman, 2013-Ohio-5035, ¶ 4 (1st Dist.)

- United States v. Lopez-Valdez, 178 F.3d 282, 289 (5th Cir. 1999)

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