

INDIANA COURT OF APPEALS

Jarren Duff v. State of Indiana

No. 25A-CR-2787 (Ind. Ct. App. June 22, 2026) · No. 25A-CR-2787 · Decided June 22, 2026

SUMMARY

The Indiana Court of Appeals affirmed Jarren Duff’s convictions for aggravated battery and battery resulting in moderate bodily injury, as well as his aggregate nine-year sentence. The court held that sufficient evidence established serious permanent disfigurement, rejected Duff’s sentencing-discretion challenge, and concluded that the sentence was not inappropriate under Indiana Appellate Rule 7(B).

CASE DETAILS

COURT	Indiana Court of Appeals
WRITING FOR THE COURT	Chief Judge Tavitias; Judge Weissmann; Judge Foley
JURISDICTION	Indiana Court of Appeals
DECIDED	June 22, 2026
DOCKET	25A-CR-2787
DISPOSITION	affirmed
PROCEDURAL POSTURE	Duff appealed his bench-trial convictions for aggravated battery and battery resulting in moderate bodily injury, challenging the sufficiency of the evidence supporting aggravated battery and the length and appropriateness of his sentence.
STANDARD OF REVIEW	Sufficiency of the evidence is reviewed deferentially; the appellate court neither reweighs evidence nor judges witness credibility and affirms unless no reasonable fact-finder could have found the elements proven beyond a reasonable doubt. Sentencing decisions are reviewed for abuse of discretion. Under Indiana Appellate Rule 7(B), the appellate court independently reviews and may revise a sentence if, after due consideration of the trial court’s decision, the sentence is inappropriate in light of the nature of the offense and the character of the offender.
PRECEDENTIAL VALUE	published
PARTIES	Jarren Duff v. State of Indiana

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QUESTIONS PRESENTED

1. Whether sufficient evidence established that Dickerson suffered serious permanent disfigurement supporting Duff's aggravated-battery conviction.
2. Whether the trial court abused its discretion in considering aggravating and mitigating circumstances and rejecting or evaluating Duff's self-defense testimony during sentencing.
3. Whether Duff's aggregate sentence was inappropriate in light of the nature of the offense and his character under Indiana Appellate Rule 7(B).

HOLDINGS

1. The evidence was sufficient to support Duff's aggravated-battery conviction because the altered bone structure and permanent plates around Dickerson's eye, as well as the permanent damage to his teeth, constituted serious permanent disfigurement even without readily visible scarring.
2. The trial court did not abuse its discretion in considering Duff's self-defense testimony in assessing the mitigating circumstance that the crime was unlikely to recur, and the record did not show that the court improperly treated Duff's maintenance of innocence as an aggravating or mitigating factor.
3. Duff's aggregate nine-year sentence was not inappropriate in light of the nature of the offenses and his character.

KEY QUOTATIONS

“Disfigurement is based on whether a person is physically less complete or whole, not whether that change is revealed to others by external scarring.” (6)

“Even if crowns could maintain Dickerson’s ability to use the broken teeth, the underlying damage to the teeth constitutes a permanent injury.” (7)

“This authority, as implemented through Indiana Appellate Rule 7(B), enables this Court to “revise a sentence authorized by statute if, after due consideration of the trial court’s decision, the Court finds that the sentence is inappropriate in light of the nature of the offense and the character of the offender.” (10)

“This does not demonstrate the restraint required to portray Duff’s offense in a positive light.” (12)

FACTUAL BACKGROUND

Duff was terminated from his job at a Walgreens after attendance problems and refused to leave the store. In a back room, he struck assistant manager Billy Brown with a badge, repeatedly punched and kicked Brown, and then attacked employee Buddy Dickerson when Dickerson attempted to intervene. Dickerson suffered multiple

facial fractures, required surgery with permanent plates and screws around his eye, and sustained dental injuries; Brown suffered bruising, swelling, and rib pain lasting approximately six weeks.

PROCEDURAL HISTORY

The State charged Duff with aggravated battery and battery resulting in moderate bodily injury and later added a second aggravated-battery count. After a bench trial, the Marion Superior Court found Duff guilty on the original aggravated-battery count and the battery count, vacated the additional aggravated-battery count on double-jeopardy grounds, and sentenced him to an aggregate nine-year term, with two years suspended to probation. Duff appealed, and the Indiana Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Hancz-Barron v. State, 235 N.E.3d 1237, 1244 (Ind. 2024)
- Sutton v. State, 167 N.E.3d 800, 801 (Ind. Ct. App. 2021)
- Drane v. State, 867 N.E.2d 144, 146-47 (Ind. 2007)
- Cornelious v. State, 988 N.E.2d 280, 283 (Ind. Ct. App. 2013)
- James v. State, 755 N.E.2d 226, 229-30 (Ind. Ct. App. 2001)
- Haverstick v. State, 648 N.E.2d 399, 401 (Ind. Ct. App. 1995)
- Anglemeyer v. State, 868 N.E.2d 482, 490-91 (Ind. 2007), as amended and clarified on reh'g, 875 N.E.2d 218 (Ind. 2007)
- Smallwood v. State, 773 N.E.2d 259, 263 (Ind. 2002)
- Phipps v. State, 90 N.E.3d 1190, 1197 (Ind. 2018)
- Schuler v. State, 132 N.E.3d 903, 904-05 (Ind. 2019)
- Rice v. State, 6 N.E.3d 940, 943 (Ind. 2014)
- Ackerman v. State, 51 N.E.3d 171, 193 (Ind. 2016)
- Owen v. State, 210 N.E.3d 256, 269 (Ind. 2023)
- Lane v. State, 232 N.E.3d 119, 122, 127 (Ind. 2024)
- Deference to the trial court's sentence under Rule 7(B)
- Oberhansley v. State, 208 N.E.3d 1261, 1267, 1271 (Ind. 2023)
- Connor v. State, 58 N.E.3d 215, 220 (Ind. Ct. App. 2016)
- Kelly v. State, 257 N.E.3d 782, 805 (Ind. 2025)
- Pritcher v. State, 208 N.E.3d 656, 668 (Ind. Ct. App. 2023)
- Brown v. State, 10 N.E.3d 1, 5 (Ind. 2014)
- Konkle v. State, 253 N.E.3d 1068, 1093 (Ind. 2025)
- Stephenson v. State, 29 N.E.3d 111, 122 (Ind. 2015)

- Harris v. State, 165 N.E.3d 91, 100 (Ind. 2021)
- McCain v. State, 148 N.E.3d 977, 985 (Ind. 2020)

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