

OHIO COURT OF APPEALS, NINTH JUDICIAL DISTRICT

State v. Stafford

2025-Ohio-5844 · No. 31288 · Decided December 31, 2025

SUMMARY

The Ninth District Court of Appeals of Ohio reversed Deshawn Stafford’s conviction and remanded the case for further proceedings. The court held that the guilty plea was invalid because the trial court failed to strictly comply with Crim.R. 11(C)(2)(c) by not advising Stafford that he was waiving the right to require the State to prove guilt beyond a reasonable doubt.

CASE DETAILS

COURT	Ohio Court of Appeals, Ninth Judicial District
WRITING FOR THE COURT	Betty Sutton; Flagg Lanzinger; Stevenson
JURISDICTION	Ohio Court of Appeals, Ninth Judicial District
DECIDED	December 31, 2025
DOCKET	31288
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Deshawn Stafford appealed from the Summit County Court of Common Pleas judgment accepting his guilty plea and imposing an indefinite prison sentence.
STANDARD OF REVIEW	Strict compliance with Crim.R. 11(C)(2)(c) is required when a trial court advises a defendant of the constitutional rights waived by a felony guilty plea. Failure to strictly comply invalidates the plea without a showing of prejudice.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Deshawn Stafford v. State of Ohio

TOPICS

- criminal procedure
- due process
- reasonable doubt
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate practice

QUESTIONS PRESENTED

1. Whether Stafford's felony guilty plea was invalid because the trial court failed to advise him that the plea waived his right to require the State to prove his guilt beyond a reasonable doubt.
2. Whether the trial court adequately advised Stafford of the maximum sentence under the Reagan Tokes Act.

HOLDINGS

1. A trial court must strictly comply with Crim.R. 11(C)(2)(c) by advising a defendant that a guilty plea waives the right to require the State to prove guilt beyond a reasonable doubt. The trial court's failure to include the beyond-a-reasonable-doubt standard made Stafford's guilty plea invalid.

KEY QUOTATIONS

“A trial court must strictly comply with Crim.R. 11(C)(2)(c) and orally advise a defendant before accepting a felony plea that the plea waives (1) the right to a jury trial, (2) the right to confront one’s accusers, (3) the right to compulsory process to obtain witnesses, (4) the right to require the state to prove guilt beyond a reasonable doubt, and (5) the privilege against compulsory self-incrimination. When a trial court fails to strictly comply with this duty, the defendant’s plea is invalid.” (¶ 8)

“Thus, because the trial court did not strictly comply with Crim.R. 11(C)(2)(c) by failing to advise Mr. Stafford that, by pleading guilty, he would waive the right to force the State to prove each and every element of each offense beyond a reasonable doubt, his plea is invalid.” (¶ 11)

FACTUAL BACKGROUND

Stafford was charged with first-degree-felony cocaine trafficking and possession, with major-drug-offender specifications. He ultimately pleaded guilty to cocaine trafficking and the major-drug-offender specification in exchange for dismissal of the other trafficking count and specification. During the plea colloquy, the trial court stated that the prosecution would have to prove every element at trial but did not state that the proof had to be beyond a reasonable doubt. Stafford was sentenced to an indefinite term of 11 to 16.5 years.

PROCEDURAL HISTORY

Stafford was indicted for cocaine-trafficking and cocaine-possession offenses, each accompanied by a major-drug-offender specification. He initially pleaded not guilty, then pleaded guilty to cocaine trafficking and the specification; the State dismissed the other count and specification. The trial court imposed an indefinite term of 11 to 16.5 years, concurrent with sentences in three other criminal cases. The Ohio Court of Appeals sustained Stafford's sole assignment of error, reversed the judgment, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded to the Summit County Court of Common Pleas for further proceedings consistent with the appellate decision.

CASES CITED

- State v. Blouir, 2022-Ohio-1222
- State v. Bishop, 2018-Ohio-5132
- State v. Clark, 119 Ohio St. 3d 239, 2008-Ohio-3748
- State v. Veney, 120 Ohio St. 3d 176, 2008-Ohio-5200
- State v. Miller, 2020-Ohio-1420
- State v. Phillips, 2025-Ohio-1235

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