

ARKANSAS COURT OF APPEALS

Lorri O. Friar v. State of Arkansas

Friar, 2026 Ark. App. 89 (Ark. Ct. App. 2026) · No. CR-25-315 · Decided February 11, 2026

SUMMARY

The Arkansas Court of Appeals affirmed the revocation of Lorri O. Friar’s probation and suspended imposition of sentence and granted appointed counsel’s motion to withdraw in a no-merit appeal. The court held that the evidence supported revocation based on a new theft-related violation and nonpayment of fines and fees, and that the twenty-year consecutive sentence was within the permissible statutory range. The court also upheld the denial of Friar’s last-minute request for new counsel.

CASE DETAILS

COURT	Arkansas Court of Appeals
WRITING FOR THE COURT	Stephanie Potter Barrett; Abramson; Gladwin
JURISDICTION	Arkansas Court of Appeals
DECIDED	February 11, 2026
DOCKET	CR-25-315
DISPOSITION	affirmed
PROCEDURAL POSTURE	No-merit appeal from an order of the Craighead County Circuit Court revoking Friar's probation and suspended imposition of sentence and imposing consecutive prison sentences totaling twenty years.
STANDARD OF REVIEW	The appellate court will not reverse a revocation decision unless it is clearly against the preponderance of the evidence. A denial of a continuance or request for new counsel is reviewed for abuse of discretion, and reversal additionally requires prejudice amounting to a denial of justice. The circuit court's decision to impose consecutive rather than concurrent sentences is reviewed for abuse of discretion; remand is warranted if the record shows the circuit court failed to exercise its discretion.
PRECEDENTIAL VALUE	precedential
PARTIES	Lorri O. Friar v. State of Arkansas

TOPICS

probation

sentencing

appellate procedure

criminal procedure

standard of review

PRACTICE AREAS

criminal procedure

probation

sentencing

appellate procedure

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support revocation of Friar's probation and suspended sentences.
2. Whether the circuit court abused its discretion by ordering Friar's sentences to run consecutively.
3. Whether the circuit court abused its discretion by denying Friar's request, made on the day of the revocation hearing, to obtain new counsel.
4. Whether counsel complied with Anders and Arkansas Rule 4-3(b) in filing a no-merit appeal and motion to withdraw.

HOLDINGS

1. The evidence supported revocation because the State proved by a preponderance of the evidence that Friar violated conditions of her probation and suspended sentences. Proof of any one violation was sufficient to sustain the revocation, and the evidence established both the toolbox theft and nonpayment of fines and fees.
2. The circuit court did not err by ordering some of Friar's sentences to run consecutively because the sentences were within the applicable statutory ranges and Arkansas law permits consecutive sentences for multiple offenses, including sentences arising from revoked suspended impositions of sentence.
3. The circuit court did not abuse its discretion by denying Friar's last-minute request to replace her appointed counsel because she merely stated that she was dissatisfied, did not identify replacement counsel or funds to hire counsel, and did not show sufficient cause or prejudice.
4. Counsel complied with Anders and Arkansas Rule 4-3(b), and the appeal was wholly without merit; the court therefore affirmed the revocation and granted counsel's motion to withdraw.

KEY QUOTATIONS

“The State need only show that the appellant committed one violation to sustain a revocation.” (at 5)

“Additionally, the question of whether sentences should run consecutively or concurrently lies within the sole province of the circuit court.” (at 7)

“From our review of the record and the brief presented to us, we find that counsel has complied with Anders and Rule 4-3 and hold that the appeal is without merit.” (at 8)

FACTUAL BACKGROUND

Friar was serving probationary and suspended sentences arising from multiple felony theft-by-receiving and drug-related convictions. The State alleged that she violated those conditions by committing a new theft-related offense and failing to pay fines and fees. At the revocation hearing, witnesses testified that Friar took a toolbox

from Walmart without paying and that she had made no payments toward approximately \$4,600 in fines and fees; Friar admitted taking the toolbox. The circuit court granted a directed verdict concerning a methamphetamine pipe but found the other violations proved, revoked the probation and suspended sentences, and imposed consecutive prison sentences totaling twenty years.

PROCEDURAL HISTORY

Friar pleaded guilty in four separate Craighead County cases and received probation, suspended sentences, or imprisonment followed by a suspended sentence. The State petitioned to revoke her probation and suspended sentences based on a new theft-related conviction and nonpayment of fines and fees. After a revocation hearing, the circuit court revoked the probation and suspended sentences and imposed consecutive sentences totaling twenty years. Appointed counsel filed an Anders no-merit brief and moved to withdraw; Friar filed a pro se point for reversal.

DISPOSITION

affirmed

CASES CITED

- Anders v. California, 386 U.S. 738 (1967)
- Harvey v. State, 2022 Ark. App. 283, 646 S.W.3d 292
- Mathis v. State, 2021 Ark. App. 49, 616 S.W.3d 274
- Brown v. State, 2014 Ark. App. 612
- Gonzalez v. State, 2020 Ark. App. 219, 599 S.W.3d 341
- Thompson v. Payne, 2021 Ark. 117, 623 S.W.3d 115
- Teague v. State, 328 Ark. 724, 946 S.W.2d 670 (1997)
- Brewer v. State, 2017 Ark. App. 335, 525 S.W.3d 24
- Raino v. State, 2021 Ark. App. 331
- Liggins v. State, 2015 Ark. App. 321, 463 S.W.3d 331