

OHIO COURT OF APPEALS, FIFTH APPELLATE DISTRICT

State v. Huff

2026-Ohio-1545 · No. 2025CA0044, 2025CA0045, 2025CA0046 · Decided April 29, 2026

SUMMARY

The Fifth District Court of Appeals affirmed Samantha Huff's convictions and sentences following negotiated guilty pleas and the revocation of community control. The court held that Huff's statements during the plea hearing did not constitute a continuing protestation of innocence requiring an enhanced Alford plea inquiry, and that her valid guilty plea supported the community-control violations.

CASE DETAILS

COURT	Ohio Court of Appeals, Fifth Appellate District
WRITING FOR THE COURT	Kevin W. Popham; Andrew J. King; David M. Gormley
JURISDICTION	Ohio Court of Appeals, Fifth Appellate District, Richland County
DECIDED	April 29, 2026
DOCKET	2025CA0044, 2025CA0045, 2025CA0046
DISPOSITION	affirmed
PROCEDURAL POSTURE	Huff appealed her convictions, sentences, and revocation of community control following negotiated guilty pleas and admissions to community-control violations.
STANDARD OF REVIEW	The court evaluated whether the guilty plea complied with Crim.R. 11 and whether competent and credible evidence supported revocation of community control.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Samantha Huff v. State of Ohio

TOPICS

- plea bargaining
- probation
- criminal procedure
- appellate procedure

PRACTICE AREAS

- criminal procedure
- appellate procedure
- plea proceedings
- community control violations

QUESTIONS PRESENTED

1. Whether Huff's guilty plea was knowingly, intelligently, and voluntarily entered despite statements indicating that she did not know about the heroin and whether the trial court was required to conduct the enhanced inquiry applicable to an Alford plea.
2. Whether Huff's guilty plea to possession of heroin constituted competent and credible evidence supporting revocation of her community control.

HOLDINGS

1. The guilty plea was knowingly, intelligently, and voluntarily entered. Because Huff did not persist in a protestation of innocence after consulting with counsel and confirming her desire to plead guilty, the trial court was not required to conduct the enhanced inquiry applicable to an Alford plea.
2. Because Huff's guilty plea to possession of heroin was validly entered, her admission to the related community-control violation constituted competent and credible evidence supporting revocation of community control.

KEY QUOTATIONS

"Because Huff did not persist in a protestation of innocence after consulting with her attorney, the enhanced Crim.R. 11 inquiry applicable to an Alford plea was not required." (§ 36)

"Because Huff's guilty plea was validly entered, her admission to the community control violations based upon the conviction for possession of heroin constitutes competent and credible evidence that she violated the conditions of her community control." (§ 40)

FACTUAL BACKGROUND

Huff was indicted in three Richland County criminal cases, including a heroin-possession charge involving nearly fifty-four grams of heroin allegedly found during a probationary home inspection. She pleaded guilty to the heroin charge after the trial court denied a continuance on the morning of trial, and she later admitted violating community control through the guilty plea and a positive alcohol test. The trial court imposed an indefinite four-to-six-year term for heroin possession and additional prison terms for the community-control violations.

PROCEDURAL HISTORY

Huff pleaded guilty to aggravated possession of drugs, failure to comply with the order or signal of a police officer, operating a vehicle under the influence, and possession of heroin. She was initially placed on community control in two cases, later pleaded guilty to the heroin charge, and admitted two community-control violations. The Richland County Court of Common Pleas revoked community control and imposed consecutive and concurrent prison terms. The Fifth District consolidated the appeals and affirmed.

DISPOSITION

affirmed

CASES CITED

- State ex rel. Bates v. Court of Appeals for the Sixth Appellate Dist., 2011-Ohio-5456, ¶¶ 27-28
- Santobello v. New York, 404 U.S. 257, 262 (1971)
- North Carolina v. Alford, 400 U.S. 25, 38 & n.10, n.11 (1970)
- State v. Belton, 2016-Ohio-1581, ¶ 50
- State v. Padgett, 67 Ohio App.3d 332, 338-339 (2d Dist. 1990)
- State v. Piacella, 27 Ohio St.2d 92 (1971), paragraph one of the syllabus
- State v. Hutchison, 2018-Ohio-200, ¶ 55 (5th Dist.)
- State v. McKinley, 2015-Ohio-2436, ¶¶ 16, 19 (5th Dist.)
- State v. Hayes, 101 Ohio App.3d 73 (3d Dist. 1998)
- State v. Grant, 2023-Ohio-4614, ¶ 12 (5th Dist.)
- State v. Marchak, 2022-Ohio-2611, ¶ 37 (5th Dist.)
- State v. Underwood, 2018-Ohio-730, ¶ 18 (5th Dist.)
- State v. Scott, 2001-Ohio-2098 (3d Dist.)