In the
Supreme Court of Ohio

STATE OF OHIO,	:	Case No. 2024-0532
	:	
Appellee,	:	On Appeal from the
	:	Montgomery County
v.	:	Court of Appeals,
	:	Second Appellate District
DORIAN L. CRAWL,	:	
	:	Court of Appeals
Appellant.	:	Case No. 29859

MERIT BRIEF OF *AMICUS CURIAE* OHIO ATTORNEY GENERAL DAVE YOST IN SUPPORT OF APPELLEE

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INTRODUCTION

A stalker can know, even without coaching on the matter, that unsolicited suggestive comments and physical confrontation will cause fear in his victim. And a factfinder can conclude, even without explicit threats or a sordid relational backstory, that the stalker *knew* his actions would cause fear in his victim. That finding of knowledge, when coupled with two other elements, supports a conviction for "menacing by stalking."

Menacing by stalking is a pattern of conduct by which the stalker knowingly causes the victim to believe she will suffer harm at the offender's hands. R.C. 2903.211(A)(1). In this case, the factfinder concluded that all three elements—a pattern of conduct, fear caused, and caused knowingly—were present. Given Dorian Crawl's aggressive advances and attempt to enter the victim's home, that conclusion was reasonable.

Crawl wants to insert a new requirement into the statute: a stalker is immune from conviction for menacing by stalking unless he uses explicit threats or ignores social-etiquette lessons by his victim. He is wrong. A factfinder looking at the full circumstances can conclude that a stalker who persistently pursues an unresponsive target is knowingly putting the victim in fear. The statute does not require that the stalker use explicit threats or that the victim explain that he needs to stop.

Even if Crawl were to win his new exemption, his conviction would still stand. At the very least, he knew that his attempted entry into the victim's home would cause fear. That act, done with knowledge and as part of a pattern of conduct, completes his crime.

STATEMENT OF *AMICUS* INTEREST

The Attorney General is the State's chief law officer and appears for the State in cases where it has an interest. R.C. 109.02. The State is interested in the correct interpretation of its menacing-by-stalking law, which protects vulnerable Ohioans from harm.

STATEMENT

I. Menacing by stalking in Ohio law has three elements.

Ohio's menacing-by-stalking statute defines the crime of menacing by stalking in terms of the prohibited acts ("a pattern of conduct"), the required mental state ("knowingly"), and the criminal result ("caus[ing] another person to believe that the offender will" cause certain harms). R.C. 2903.211(A)(1). Here is the full text:

> No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person or cause mental distress to the other person or a family or household member of the other person. In addition to any other basis for the other person's belief that the offender will cause physical harm to the other person or the other person's family or household member or mental distress to the other person or the other person's family or household member, the other person's belief or mental distress may be based on words or conduct of the offender that are directed at or identify a corporation, association, or other organization that employs the other person or to which the other person belongs.

Id. The statute further defines "pattern of conduct" as requiring two or more actions closely related in time. R.C. 2903.211(D)(1). And Ohio law more generally defines an act as done "knowingly" when, "regardless of purpose, [an offender] is aware that [his] conduct will probably cause a certain result or will probably be of a certain nature." R.C. 2901.22(B). Knowledge can be either actual "aware[ness]" that a circumstance

"probably" exists, or an attempt to "avoid learning [a] fact" that would confirm the accused person's belief of a certain fact. *Id.* (Some would call the second type of knowledge "willful blindness.")

II. Crawl was convicted of menacing by stalking.

About two decades after going to elementary school with a woman identified by Crawl's brief as "CP" and by the Court of Appeals here as "A.P."—and long after A.P. had forgotten he existed—Dorian Crawl started messaging A.P. with pet names and personal questions on social media. *State v. Crawl*, 2024-Ohio-752, ¶¶3–6 (2d Dist.). He sent his first message via Instagram in 2020. *Id.* at ¶4. Because A.P. did not use her Instagram frequently, she did not see Crawl's message and friend request until May 2022. *Id.* She did not respond or approve the request. *Id.* A.P. also posted a picture to celebrate her birthday, with the caption, "29, be great to me." *Id.* at ¶5 (quotation omitted). A.P.'s account was public, so anyone could view the post. *Id.* In apparent response to her ignoring his friend request, Crawl messaged her a "sad emoji." *Id.* (quotation omitted). He then said, "Happy Birthday, baby girl. I love you. Hope we can see each other sometime soon." *Id.* (quotation omitted). Again, A.P. did not respond. *Id.* She felt very uncomfortable. *Id.* Six days later, A.P. posted a video to her Instagram account. *Id.* at ¶6. Crawl responded to the video, "Where is this, [A.P]? Is this your house, boo?" *Id.* (quotation omitted); Trial Tr. at 18. Once more, A.P. did not respond. *Crawl*, 2024-Ohio-752, at ¶6.

A few weeks later, Crawl showed up at A.P.'s home and knocked on the door. Trial Tr. at 7–9. A.P. looked through the peephole of her front door and saw Crawl. *Crawl*, 2024-Ohio-752, at ¶6. When she asked who was there, Crawl said, "It's Dorian. I'm [A.P.'s] friend. I'm here to see her." Crawl then turned the doorknob. *Id*. (quotation omitted). A.P. "freaked out" when she saw Crawl because of the messages Crawl had been sending her. *Id*. at ¶¶5–7 (quotation omitted). Her child was in the house, and she did not know if Crawl would force his way through the door. *Id.* at ¶7. After locking the deadbolt, A.P. told her child to hide in the closet. *Id.* She then called the police. *Id.* Officer Selmon responded and found A.P. "visibly upset, shaken, crying." *Id.* at ¶9 (quotation omitted).

Officer Selmon then interviewed Crawl. *Id.* Crawl said that "he had known A.P. since their teenage years, that they were never friends" and had "never talked in school." *Id.* at ¶10 (quotation omitted). Still, he was contacting A.P. because he was supposedly trying to create "more of a relationship" with her. *Id.* (quotation omitted). He admitted to Officer Selmon that A.P. had never given him her address; he found it by Googling her name. *Id.* at ¶11.

"After the incident, A.P. installed security cameras around her apartment." *Id.* at ¶8. She was uncomfortable alone and had her boyfriend stay over more often. *Id.* And she made sure she was on the phone with someone when she came home late at night with her child. *Id.*

The State charged Crawl with menacing by stalking in violation of R.C. 2903.211(A)(1), a first-degree misdemeanor. *Id.* at ¶2. After Crawl had talked with the police and had a criminal action filed against him, alerting Crawl that his advances were criminally inappropriate, he sent more social media messages to A.P. *Id.* at ¶11; Trial Tr. at 26–27. (Crawl's brief mistakenly asserts that Crawl sent no further messages, citing a portion of the transcript in which an officer testified that only the original three messages were "at issue" in the investigation. *Compare* Crawl Br. at 2 (citing Tr. at 39), *with* Tr. at 26–27.)

The trial court found Crawl guilty after a bench trial. *Crawl*, 2024-Ohio-0752 at ¶12. He was sentenced to 180 days in jail with 178 days suspended and two days jail time credit, placed on probation for two years, and prohibited from contacting A.P. for two years. *Id.* Crawl appealed, and the trial court granted a stay pending appeal. *Id.* The Second District affirmed. *Id.* at ¶32. That court reviewed the record and found the conviction was supported by sufficient evidence and not against the manifest weight of the evidence. *Id.* at ¶31.

Crawl then appealed to this Court, raising a sufficiency-of-the-evidence challenge. Jur. Mem. at 7; Crawl Br. at 4. This Court accepted jurisdiction on whether the evidence can support a finding that an offender *knowingly* caused fear by "making non-threatening comments to an individual's public social media platform posts, when there is no relationship between the individuals," and the recipient does not "put the commentator

on notice that she finds the comments ... unwanted." *06/25/2024 Case Announcements*, 2024-Ohio-2373; Jur. Mem. at ii.

ARGUMENT

<u>*Amicus Curiae* Ohio Attorney General's Proposition of Law:</u>

> *Repeated unsolicited and unrequited personal communications can support the conclusion that an offender knew he would cause fear even without explicit threats or a victim's instruction to stop.*

The menacing-by-stalking statute forbids any pattern of conduct by which the offender knowingly causes fear of physical harm or mental distress. R.C. 2903.211(A)(1). A "pattern of conduct" is at least two actions that are "closely related in time." R.C. 2903.211(D)(1). And the criminal result is causing fear of physical harm or mental distress. R.C. 2903.211(A)(1). Crawl does not contest those elements.

The crux of this appeal is how to apply the "knowingly" mens rea standard in Ohio's menacing-by-stalking law. Under Ohio law, "knowingly" means that, "regardless of [his] purpose, [an offender] is aware that [his] conduct will probably cause a certain result or will probably be of a certain nature." R.C. 2901.22(B). To determine what the accused stalker knew, the factfinder looks to his actions and the context to decide whether he knew his actions would cause fear.

I. The factfinder reasonably held that Crawl knew his stalking would cause fear.

Under the menacing-by-stalking statute, a forbidden pattern of conduct can consist of unsolicited, unrequited personal communications even if they do not contain explicit threats. When the factfinder determines the defendant's mental state, it can look to all

relevant evidence, such as inappropriate suggestive comments, uncalled-for persistence, and the obviously harassing nature of the communications.

A. Menacing by stalking requires knowledge that the aggressor's actions will cause fear.

Menacing by stalking requires that the stalker cause fear of physical harm or mental distress "knowingly." This standard turns on whether "the evidence allows the trier of fact to reasonably conclude that the defendant was aware that his conduct would probably cause the victim to believe that the defendant will cause physical harm or mental distress to the victim." *State v. Simpson*, 2024-Ohio-2865, ¶76 (11th Dist.); *Frenchko v. Shook*, 2024-Ohio-3153, ¶9 (11th Dist.). Unlike when an offender acts purposefully, knowledge does not require that the offender "intended that his actions cause fear of physical harm or mental distress"; knowledge that it will probably occur is enough. *Vega v. Tomas*, 2017-Ohio-298, ¶15 (8th Dist.). This inquiry examines "all the facts and circumstances in evidence." *State v. Teamer*, 82 Ohio St. 3d 490, 492 (1998).

The "knowingly" mens rea requirement cabins the statute's scope, but it does not exclude certain actions or specifically exempt social-media posts. A "pattern of conduct" is "two or more actions or incidents closely related in time," R.C. 2903.211(D)(1), and "action" or "incident" encompass any "thing done." Bryan A. Garner, *Garner's Modern English Usage* 20, 584 (5th ed. 2022). If the General Assembly had intended to exempt certain actions from the menacing-by-staking statute, it could have expressly done so, just as it specifically exempted providers of electronic media transfer platforms from

liability. *See, e.g.*, R.C. 2903.211(F)(1)–(2); *cf. State ex rel. Stoll v. Logan Cnty. Bd. of Elections*, 2008-Ohio-333, ¶39. The statute thus implicates any actions done "knowingly," without exempting any particular conduct.

That makes sense. Each relationship (or lack thereof) between a stalker and his victim is different. Instead of specifying in advance conduct that constitutes menacing by stalking, the statute asks whether the offender knew his action would cause fear. To the victim and the public, *how* he knows is irrelevant.

Under the menacing-by-stalking statute, a forbidden pattern of conduct can consist of unsolicited, unrequited personal communications even if they do not contain explicit threats. When the factfinder determines the defendant's mental state, it can look to all relevant evidence, such as suggestive comments, unwarranted persistence, and the obviously harassing nature of the communications. And factfinders "must take every action into consideration, even if some actions in isolation do not appear threatening." *State v. Gonzalez*, 2022-Ohio-2870, ¶11 (8th Dist.).

B. The factfinder reasonably concluded that Crawl knew his actions would cause fear.

The factfinder reasonably concluded that Crawl knew his actions would cause fear. Consider Crawl's pattern of conduct. He messaged someone he had not seen or spoken to for almost twenty years, "I love you" and called her "baby girl." *Crawl*, 2024-Ohio-752 at ¶¶3, 5 (quotation omitted). There was no response. *Id.* at ¶5. He then asked A.P. if the video she posted was her house and called her "boo." *Id.* at ¶6 (quotation

omitted). No response. *Id.* Undeterred, he found her address online and went to her house. *Id.* at ¶11. Uninvited, he tried to enter without permission. *Id.* at ¶6.

This pattern of conduct supports the trial court's finding of menacing by stalking. For one, Crawl had no relationship at all with A.P. when he started calling her pet names. *Id.* at ¶¶3–4. Yet Crawl not only pressed on after receiving no response to his overtures, but he also chose an unannounced visit to A.P.'s home and an attempt to break in as his next step in pursuing her. *Id.* at ¶6. These facts and circumstances suggest that Crawl was aware that his conduct would probably cause fear. And even if it would be tempting to think that Crawl's actions reflected innocent misjudgment, he demonstrated before trial that explicit notice that his actions caused fear made no difference to him. Even after A.P. called the police, Crawl spoke with the police, and Crawl was charged with menacing by stalking, he again messaged A.P. on social media. *Id.* at ¶11. This act removes any question as to whether Crawl's knowledge of causing fear would have induced Crawl to stop. No—he would indeed contact A.P. even though he knew it was causing her fear.

C. Crawl's contrary arguments fail.

Crawl identifies three separate facts and circumstances that he claims demonstrate that the evidence was insufficient to support his menacing-by-stalking conviction. Two support the conclusion that he *was* aware he would cause fear. And the third is unpersuasive.

First, Crawl argues that the absence of any prior relationship between himself and A.P. is of no value in determining whether he was aware of the probable effects of his communications. Crawl Br. at 9. Unlike instances in which a prior relationship can provide the context that helps establish the offender was aware of the probable results of his conduct, Crawl says, the lack of prior history cannot support a similar inference. *Id.*

Yet, nowhere does the menacing-by-stalking statute suggest that a prior relationship between the offender and victim is necessary to establish that the offender knew he was causing fear. R.C. 2903.211. To be sure, sometimes a prior relationship may be part of the context that helps establish the offender's mens rea. *See, e.g.*, *State v. Spaulding*, 2016-Ohio-8126, ¶114; *State v. Bilder*, 99 Ohio App. 3d 653, 658 (9th Dist. 1994). But that hardly makes a prior relationship a prerequisite. Strangers can be stalkers, too. More likely, a factfinder would conclude that the utter lack of a relationship between two parties in a situation like this makes fear the most likely outcome—one even a schoolchild might find familiar. *See generally*, Stan & Jan Berenstain, *The Berenstain Bears Learn About Strangers* (1985). That common-sense conclusion could bolster a finding that the offender knew his actions would cause fear. Either way, any relationship or lack thereof is just one piece of the facts and circumstances that the factfinder must consider. *See Teamer*, 82 Ohio St. at 492.

This case is a perfect example of how context can support a finding that the accused acted knowingly. A stranger messaged a woman out of the blue. *Id.* at ¶¶3–4. His

comments were intimate, even suggestive, in nature. *Id.* at ¶5. He expressed a desire to see her soon and asked about her house. *Id.* at ¶¶5–6. After receiving no response, he shifted his communications from the virtual to the physical world and appeared uninvited at her home. *Id.* at ¶6. And when she did not admit him, he tried to enter the home against her will. *Id.* A reasonable factfinder could conclude that someone taking these actions knew that he would cause fear.

Next, Crawl blames the victim. Crawl Br. at 15. He says A.P. should have notified him that his communications caused distress. *Id.* But the menacing-by-stalking statute contains no requirement that the victim communicate with the offender. R.C. 2903.211(A)(1). Of course, an explicit rebuff could certainly demonstrate that the offender knew that continued contact would cause fear. *See, e.g.*, *State v. Skaggs*, 2022-Ohio-2822, ¶12. But persistent communication in the face of no response can also be alarming. Not only did A.P. never respond to Crawl, but she also ignored his friend request. *Id.* at ¶4. Crawl knew that (and messaged her a sad emoji)—yet still proceeded to ratchet up his pursuit of A.P. *Crawl*, 2024-Ohio-752 at ¶¶4–6. A factfinder could conclude that Crawl's insistence—and probing for personal information (i.e., "Is this your house, boo?") despite no demonstration of the slightest interest—showed his knowledge that his actions would cause fear in A.P. *Id.* at ¶¶5–6 (quotation omitted). Under these circumstances, it was precisely the lack of response that keyed Crawl into an awareness of the harassing nature of his pattern of conduct. Victims like A.P. have no duty to contact their stalkers before

their actions can support a menacing-by-stalking conviction. (Indeed, such a requirement might further endanger some victims.)

Finally, Crawl argues that his messages cannot support his conviction because they do not contain explicit threats. Crawl Br. at 8, 12. Crawl warns that, without a special exemption for messages like his, the statute "would subject all everyday users of social media to potential charges of stalking for nothing more than reacting to an individual['s] posts." *Id.* at 8.

He is wrong because the statute does not require that the offender's pattern of conduct consist of explicit threats. R.C. 2903.211. Any acts by which stalkers knowingly cause fear can support a conviction within the statute, even if the "action[s] or incident[s]" considered in a vacuum are not explicitly threatening. R.C. 2903.211(D)(1). What is more, the stalker can violate the law by causing fear of mental distress, not just physical harm, so the idea that an explicit physical threat is necessary has no mooring in the statute. R.C. 2903.211(A)(1). And Crawl's warning rings hollow because the "knowingly" requirement protects truly innocent communications. Even communications that *do* cause fear cannot support a conviction if the factfinder concludes that the accused had no knowledge that they would cause fear. *Id.*

Other Ohio courts have acknowledged that contacts without explicit threats—indeed, even disclaiming physical threats—can support a menacing-by-stalking conviction. For instance, one victim demonstrated every element of a menacing-by-stalking claim when

the offender dropped off gifts at her house, offered her dinner invitations, and told her "I will never hurt you or try to hurt you" and "as long as I am alive you will never have to worry," among other "obsessive expressions of love, longing, and loneliness" sent to the victim in more than 60 emails. *R.G. v. R.M.*, 2017-Ohio-8918, ¶¶18–21 (7th Dist.). None of those actions were explicit threats. Another stalker met every element by visiting the victim at work, following her around town, sending her numerous emails, and calling her multiple times. *Smith v. Wunsch*, 2005-Ohio-3498, ¶¶3–8, 14 (4th Dist.). There too, the defendant made no explicit threats. In short, "explicit threats are not necessary to establish the elements of menacing by stalking." *Darling v. Darling*, 2007-Ohio-3151, ¶22 (7th Dist.) (quotation omitted).

To be sure, threats can lead to an inference that the offender knew he would cause the victim to believe she would suffer physical harm or mental distress at the offender's hands. But threats are not the only type of conduct that can support the conclusion the offender knew fear would be the probable result. Here, for example, Crawl's communications were not threats of harm, but they did express a desire for intimacy—even when A.P. was not interested. *Crawl*, 2024-Ohio-752 at ¶¶4–6. A factfinder could conclude that this was more than an "awkward attempt to get to know [A.P.] better," Crawl Br. at 11; it was an undissuadable campaign to pursue A.P. despite knowing it was causing her fear.

II. Even if Crawl were to prevail on his proposition of law, the undisputed facts still support Crawl's conviction.

Even if this Court agreed with Crawl's argument that his messages alone cannot support the mens rea finding, his conviction would still hold up because the facts support each of the three statutory elements. He engaged in a pattern of conduct. He caused fear. And in the very least, he knew that his last act of attempted breaking and entering would cause fear. Thus, all three elements of the law are met.

A. Menacing by stalking requires knowledge of fear to accompany at least one act in the pattern of conduct.

As noted above, the menacing-by-stalking statute requires three elements: "a pattern of conduct," a knowing mental state, and a resulting fear. R.C. 2903.211(A)(1) ("No person by engaging in a pattern of conduct shall knowingly cause another person to believe…"). It does not require that the mental state predate every act in the pattern of conduct. In other words, when someone has already begun a pattern of conduct and then later comes to know that it will cause fear in the victim, continuing that pattern of conduct with even a single additional act completes the crime.

The grammar of the statute supports this conclusion. In the phrase, "No person by engaging in a pattern of conduct shall knowingly cause [fear]," the word "knowingly" modifies the word "cause." R.C. 2903.211(A)(1). It does not modify the phrase "pattern of conduct." That means that the offender must know the ultimate result; he must know that the victim will be put in fear. If the General Assembly had intended to require that

each act in the pattern of conduct be done knowingly, it would have written instead, "No person shall knowingly engage in a pattern of conduct that causes [fear]." Because they did not write it that way, this Court should not read it that way.

The General Assembly's choice makes sense. Stalking situations do not necessarily always begin with an intent to create fear. Suppose, for example, that a would-be lover texts his interest multiple times but does not receive a response. Then suppose he later finds out that the love interest is afraid because of his text messages. Stinging from the rejection, he sends one more text because he knows it will continue her fear. Has there been a pattern of conduct? Yes, he sent multiple text messages. Has there been fear? Yes, the love interest is afraid. And has the would-be lover acted knowingly? Yes, he sent the last text message knowing that it would frighten her. All three elements of the statute are met. It does not matter *when* in the pattern of conduct the knowledge materialized, as long as the stalker took at least one action with knowledge that he was creating fear.

B. Crawl took at least one action with knowledge that he was creating fear.

Because Crawl took at least one action with the knowledge that it would cause A.P. fear, and because that act was part of a pattern of conduct and did cause fear, his conviction is valid. Crawl does not deny that he knew his attempted forced entry into A.P.'s house would cause fear. *Crawl*, 2024-Ohio-752 at ¶¶3, 5–6. And he does not deny that his attempted entry was part of a pattern of conduct. *Id.* at ¶¶10–11. Nor does he deny that he caused A.P. fear. *Id.* at ¶¶7–11. So even if he did not have knowledge that

the suggestive messages would cause fear (but he did; see above), Crawl is still guilty of menacing by stalking.

Just as in the hypothetical above, this outcome is consistent with the statute. It meets all three elements because committing an act with the requisite mens rea—when the victim has also been subjected to a fear-inducing pattern of conduct—matches the conduct the statute prohibits.

* * *

Relationships take different forms. So does harassment. To account for the infinite ways a stalker can cause fear, the General Assembly established the three elements—and only those three elements—in the menacing-by-stalking statute. The focus in any given case may be discerning the accused's mental state, and that inquiry always considers the full picture and the factfinder's best judgment. Even without explicit threats or a response from the victim, a stalker can know that his actions are causing fear. When he does—at any point before the end of the pattern of conduct—he commits menacing-by-stalking. And when he does, Ohio law steps in to protect victims from living in fear.

CONCLUSION

For the foregoing reasons, the Court should affirm the Second District.

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I hereby certify that a copy of the foregoing Merit Brief of *Amicus Curiae* Ohio Attorney General Dave Yost in Support of Appellee was served this 14th day of October 2024, by e-mail on the following:

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