

CALIFORNIA COURT OF APPEAL, FOURTH APPELLATE DISTRICT,
DIVISION THREE

People v. NavaAdame

People v. NavaAdame · No. G064663 · Decided November 17, 2025

SUMMARY

The California Court of Appeal, Fourth Appellate District, Division Three, held that Javier NavaAdame’s interrogation initially was noncustodial but became custodial before he made admissions concerning sexual acts with a victim. Because law enforcement had not provided Miranda warnings at that point, the admissions should have been suppressed, and their admission was not harmless beyond a reasonable doubt. The court reversed the judgment.

CASE DETAILS

COURT	California Court of Appeal, Fourth Appellate District, Division Three
WRITING FOR THE COURT	Delaney, Acting Presiding Justice; Gooding, Justice; Scott, Justice
JURISDICTION	California Court of Appeal, Fourth Appellate District, Division Three
DECIDED	November 17, 2025
DOCKET	G064663
DISPOSITION	reversed
PROCEDURAL POSTURE	Defendant appealed from a judgment of conviction following a jury trial in the San Bernardino County Superior Court. The appeal challenged admission of prearrest statements, alleged violations concerning the right to counsel, joinder of charges, and voluntariness.
STANDARD OF REVIEW	The court accepted supported historical factual findings for substantial evidence and independently determined whether the interrogation was custodial. The admission of the confession was reviewed for harmless error beyond a reasonable doubt under Chapman v. California.
PRECEDENTIAL VALUE	Published California Court of Appeal opinion; precedential.
PARTIES	Javier NavaAdame v. The People

TOPICS

- miranda rights
- fifth amendment
- suppression of evidence
- criminal procedure
- appellate procedure

PRACTICE AREAS

criminal procedure

constitutional law

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether NavaAdame's statements made during prearrest police questioning were obtained during a custodial interrogation requiring Miranda warnings.
2. Whether the officers violated NavaAdame's Fifth Amendment right to counsel by continuing to question him after his alleged equivocal request for counsel.
3. Whether admission of NavaAdame's confession was harmless beyond a reasonable doubt.
4. Whether joinder of the cases involving P.N. and I.N. was improper or unduly prejudicial.

HOLDINGS

1. The interrogation was noncustodial during the questioning by Deputy Baltierra and during the first two parts of Detective Long's questioning, but became custodial when Detective Long returned for the third part and used lengthy, confrontational monologues and confession-producing techniques after approximately one and a half hours of questioning.
2. The statements NavaAdame made after the interrogation became custodial should have been suppressed, and the trial court's admission of them was not harmless beyond a reasonable doubt.
3. The officers did not violate NavaAdame's Fifth Amendment right to counsel by failing to stop questioning or seek clarification after his alleged equivocal request for counsel because the request occurred before the interrogation became custodial.
4. The court did not decide the joinder issue and left it for the parties and trial court to address in the first instance on remand.

KEY QUOTATIONS

"However, when police create an atmosphere equivalent to that of formal arrest by questioning a suspect who is isolated behind closed doors in a police station interrogation room, by repeatedly confronting him with the evidence against him, repeatedly dismissing his denials, and telling him at the outset he is free to leave—when all the objective circumstances later are to the contrary— Miranda is triggered." (24)

"A confession is like no other evidence. Indeed, 'the defendant's own confession is probably the most probative and damaging evidence that can be admitted against him.'" (25)

FACTUAL BACKGROUND

NavaAdame and his wife adopted P.N. and I.N. through the foster-care system, and the children lived with them and other family members. After P.N., nearly 17, reported years of sexual abuse, NavaAdame voluntarily went to the sheriff's station to turn himself in and was questioned in three successive sessions without Miranda warnings. During the third session, after officers had questioned him for approximately one and a half hours and used accusatory and minimizing interrogation techniques, he confessed to having sexual intercourse with P.N. multiple times a week over several years.

PROCEDURAL HISTORY

NavaAdame was convicted on all 11 charged counts and related enhancements after the trial court denied his motion to suppress statements made during police questioning. He was sentenced to 120 years to life plus a six-year determinate term. The Court of Appeal held that the interrogation became custodial before his confession, that the un-Mirandized confession was prejudicial, reversed the judgment, and left joinder for reconsideration on remand.

DISPOSITION

reversed

REMAND INSTRUCTIONS

On remand, the parties and the trial court must address the joinder issue in the first instance because the circumstances will differ after the Miranda ruling. The confession obtained after the interrogation became custodial should be excluded at any retrial.

CASES CITED

- Miranda v. Arizona (1966) 384 U.S. 436, 467
- People v. Saldana (2018) 19 Cal.App.5th 432, 454-461
- U.S. v. Kim (9th Cir. 2002) 292 F.3d 969, 975
- People v. Stansbury (1995) 9 Cal.4th 824, 832
- People v. Moore (2011) 51 Cal.4th 386, 396, 401-403
- People v. Torres (2018) 25 Cal.App.5th 162, 179
- U.S. v. Craighead (9th Cir. 2008) 539 F.3d 1073, 1088
- People v. Sims (1993) 5 Cal.4th 405, 447
- Chapman v. California (1967) 386 U.S. 18, 24
- People v. Aguilera (1996) 51 Cal.App.4th 1151, 1166
- Arizona v. Fulminante (1991) 499 U.S. 279, 296
- Davis v. U.S. (1994) 512 U.S. 452, 457-458
- Edwards v. Arizona (1981) 451 U.S. 477, 485-486