

MISSISSIPPI COURT OF APPEALS

Pitipong Daengbunga v. State of Mississippi

Daengbunga · No. 2024-KA-01122-COA · Decided January 27, 2026

SUMMARY

The Mississippi Court of Appeals affirmed Pitipong Daengbunga’s convictions for first-degree murder and tampering with physical evidence, as well as his sentences of life imprisonment and a consecutive ten-year term. The court held that statements Daengbunga made to VA police officers were not obtained during custodial interrogation requiring Miranda warnings. The court also held that evidence of a prior domestic-violence conviction was admissible for noncharacter purposes and was not substantially outweighed by unfair prejudice.

CASE DETAILS

COURT	Mississippi Court of Appeals
WRITING FOR THE COURT	Lassitter St. Pé, J.; Barnes, C.J.; Carlton, P.J.; Wilson, P.J.; McDonald, J.; Lawrence, J.; McCarty, J.; Emfinger, J.; Weddle, J.; Westbrook, J.
JURISDICTION	Mississippi Court of Appeals
DECIDED	January 27, 2026
DOCKET	2024-KA-01122-COA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Daengbunga appealed his convictions and sentences for first-degree murder and tampering with physical evidence, challenging the denial of his motion to suppress statements and the admission of prior-bad-acts evidence.
STANDARD OF REVIEW	A suppression ruling is reviewed for manifest error, an incorrect legal standard, or being against the overwhelming weight of the evidence. The admission or exclusion of evidence is reviewed for abuse of discretion, and reversal requires an error affecting a substantial right.
PRECEDENTIAL VALUE	published
PARTIES	Pitipong Daengbunga v. State of Mississippi

TOPICS

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

PRACTICE AREAS

criminal law

criminal procedure

evidence

constitutional law

appellate practice

QUESTIONS PRESENTED

1. Whether Daengbunga was in custody and subjected to custodial interrogation when he made statements to VA officers, requiring Miranda warnings.
2. Whether evidence of Daengbunga's prior aggravated-domestic-violence conviction was admissible under Mississippi Rules of Evidence 404(b) and 403.

HOLDINGS

1. Daengbunga was not in custody or subjected to custodial interrogation when he made the statements at the VA hospital; therefore, Miranda warnings were not required and the circuit court properly denied the motion to suppress.
2. The prior-assault evidence was admissible for noncharacter purposes, including motive, intent, and rebuttal of self-defense, and its probative value was not substantially outweighed by the danger of unfair prejudice under Rules 404(b) and 403.

KEY QUOTATIONS

“Thus, we hold that the circuit court did not err by finding that no Miranda violation occurred, and the denial of Daengbunga’s motion to suppress was proper.” (13)

“The evidence was offered for a relevant non-character purpose, and the circuit court did not abuse its discretion by ultimately determining its probative value was not substantially outweighed by the danger of an unfairly prejudicial effect.” (16)

FACTUAL BACKGROUND

Daengbunga went to a Veterans Affairs hospital after killing his roommate, Jamie Boggs, and voluntarily told VA officers that Boggs had attacked him and that he had killed her in self-defense. He was not handcuffed, restrained, or told that he could not leave while at the hospital, although officers monitored him while his injured hand was treated. The State introduced evidence that Boggs suffered severe facial and other injuries, including a bite mark with DNA consistent with Daengbunga. It also introduced evidence of Daengbunga's prior domestic-violence assault involving similarly severe facial injuries to a woman with whom he lived.

PROCEDURAL HISTORY

A Harrison County grand jury indicted Daengbunga for murder and tampering with evidence. After a jury trial, he was convicted and sentenced to life imprisonment for murder and a consecutive ten-year term for tampering with physical evidence. The circuit court denied his post-trial motion, and the Mississippi Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- *McCammon v. State*, 299 So. 3d 873, 889 (¶53) (Miss. Ct. App. 2020)
- *Drake v. State*, 800 So. 2d 508, 513 (¶12) (Miss. 2001)
- *Hunt v. State*, 687 So. 2d 1154, 1160 (Miss. 1996)
- *Roberson v. State*, 61 So. 3d 204, 208 (¶12) (Miss. Ct. App. 2010)
- *Batiste v. State*, 121 So. 3d 808, 858 (¶121) (Miss. 2013)
- *Rhode Island v. Innis*, 446 U.S. 291, 301 (1980)
- *Shell-Blackwell v. State*, 305 So. 3d 1211, 1219, 1222 (¶¶23, 32) (Miss. Ct. App. 2020)
- *Johnson v. State*, 204 So. 3d 763, 768 (¶¶14-15) (Miss. 2016)
- *Stone v. State*, 94 So. 3d 1078, 1084 (¶18) (Miss. 2012)

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