

THIRD DISTRICT COURT OF APPEAL OF FLORIDA

State of Florida v. Eddie Poke

Poke · No. 3D24-0657 · Decided October 29, 2025

SUMMARY

The Third District Court of Appeal of Florida reversed an order suppressing statements and physical evidence obtained during a traffic stop. The court held that the defendant was not in Miranda custody during the relevant questioning and that the vehicle search was supported by the automobile exception and, alternatively, other valid search doctrines.

CASE DETAILS

COURT	Third District Court of Appeal of Florida
WRITING FOR THE COURT	BOKOR, J.; SCALES, C.J.; MILLER, J.
JURISDICTION	Third District Court of Appeal of Florida
DECIDED	October 29, 2025
DOCKET	3D24-0657
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The State appealed a non-final county-court order granting Eddie Poke's motion to suppress statements and physical evidence obtained during a traffic stop.
STANDARD OF REVIEW	Review of a suppression order presents a mixed question of law and fact. The trial court's factual findings are presumed correct if supported by competent, substantial evidence, while the legality of the search is reviewed de novo; the evidence and reasonable inferences are interpreted in the manner most favorable to sustaining the trial court's ruling.
PRECEDENTIAL VALUE	Published state intermediate appellate opinion; precedential status is subject to finality after any timely motion for rehearing.
PARTIES	State of Florida v. Eddie Poke

TOPICS

- miranda rights
- fourth amendment
- search and seizure
- suppression of evidence
- appellate procedure

PRACTICE AREAS

criminal procedure

constitutional criminal procedure

search and seizure

appellate procedure

QUESTIONS PRESENTED

1. Whether Poke was in custody for Miranda purposes during the traffic stop and related questioning before and after he was handcuffed.
2. Whether the statements made during the stop were subject to suppression because they resulted from custodial interrogation without Miranda warnings.
3. Whether the physical evidence discovered in the vehicle was subject to suppression under the Fourth Amendment.

HOLDINGS

1. A traffic stop and reasonable questions concerning the reason for the stop, the driver's license, and weapons in the vehicle do not constitute custody for Miranda purposes merely because the officer asks about firearms, directs the driver to exit the vehicle, or temporarily detains the driver while securing a weapon.
2. The physical evidence discovered during the vehicle search was not subject to suppression because the automobile exception supplied a basis for the warrantless search, and the evidence also would have been admissible under a search incident to lawful arrest or inevitable discovery theory.

KEY QUOTATIONS

“the usual traffic stop is more analogous to a so-called ‘Terry stop’ than to a formal arrest. . . . [P]ersons temporarily detained pursuant to such stops are not ‘in custody’ for the purposes of Miranda.” (5)

“Miranda warnings apply only to in-custody interrogations” (3)

FACTUAL BACKGROUND

A sergeant stopped Eddie Poke's vehicle after determining that its license plate was expired. During the stop, Poke stated that his license was suspended and that he had a rifle in a black duffel bag on the back seat; the officer later secured a loaded, unsecured AR-15 rifle, handcuffed Poke, and searched the vehicle. The search revealed an open container of malt liquor, and Poke made statements about marijuana and the firearm without receiving Miranda warnings.

PROCEDURAL HISTORY

Poke moved to suppress statements and physical evidence, asserting that the evidence resulted from custodial interrogation without Miranda warnings and an improper vehicle search. The County Court for Miami-Dade County granted suppression, finding that Poke was in custody for Miranda purposes from the time the officer reported a weapons-violation Code 55. The Third District Court of Appeal reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The suppression order is reversed and the case is remanded for further proceedings.

CASES CITED

- Miranda v. Arizona, 384 U.S. 436 (1966)
- Ross v. State, 45 So. 3d 403, 414-15 (Fla. 2010)
- Ramirez v. State, 739 So. 2d 568, 573 (Fla. 1999)
- Caldwell v. State, 41 So. 3d 188, 198 (Fla. 2010)
- State v. Martissa, 18 So. 3d 49, 52 (Fla. 2d DCA 2009)
- Terry v. Ohio, 392 U.S. 1 (1968)
- Berkemer v. McCarty, 468 U.S. 420, 439-40 (1984)
- State v. Harris, 273 So. 3d 1100, 1101 (Fla. 3d DCA 2019)
- Pagan v. State, 830 So. 2d 792, 806 (Fla. 2002)
- Jones v. State, 279 So. 3d 342, 347 (Fla. 5th DCA 2019)
- United States v. Ross, 456 U.S. 798, 825 (1982)
- State v. Ojeda, 147 So. 3d 53, 65 (Fla. 3d DCA 2014)