

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States v. Kujabi

Criminal Action No. 25-194 (LLA) (D.D.C. Jan. 20, 2026) · No. Criminal Action No. 25-194 (LLA) · Decided January 20, 2026

SUMMARY

The United States District Court for the District of Columbia considers Ablie Kujabi’s motion to suppress physical evidence and statements arising from a traffic stop and subsequent search of his vehicle. The court finds that the initial traffic stop was supported by probable cause and was not unlawfully prolonged, but concludes that the warrantless vehicle search violated the Fourth Amendment. The court grants the motion to suppress physical evidence and denies the motion to suppress statements without prejudice to refiling.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Loren L. AliKhan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 20, 2026
DOCKET	Criminal Action No. 25-194 (LLA)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Ablie Kujabi moved to suppress physical evidence obtained from a warrantless search of his vehicle and statements made to police. Following an evidentiary hearing, the district court granted suppression of the physical evidence and denied suppression of statements without prejudice to refiling.
STANDARD OF REVIEW	The government bears the burden of justifying a warrantless search or seizure. Probable cause and reasonable suspicion are assessed based on the totality of the circumstances and the facts known to officers at the time of the intrusion.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the District of Columbia but not binding precedent outside the case.

TOPICS

fourth amendment

search and seizure

suppression of evidence

probable cause

warrant requirement

PRACTICE AREAS

criminal procedure

constitutional law

evidence

QUESTIONS PRESENTED

1. Whether the officers had probable cause to conduct the initial traffic stop.
2. Whether the officers unlawfully prolonged the traffic stop.
3. Whether the warrantless search of Kujabi's vehicle was valid as a search incident to Darkwah's arrest under the evidentiary rationale of *Arizona v. Gant*.
4. Whether Kujabi's unidentified statements should be suppressed as fruits of an unlawful search or seizure.

HOLDINGS

1. The traffic stop was constitutional because the officers had probable cause to believe that Kujabi had violated Virginia and District of Columbia license-plate requirements.
2. The officers did not unlawfully prolong the traffic stop.
3. The warrantless search of Kujabi's vehicle was unconstitutional because the government failed to establish reasonable suspicion that evidence of Darkwah's firearm-possession offense would be found in the vehicle.
4. The motion to suppress statements was denied without prejudice because Kujabi failed to identify which statements he sought to suppress or establish the basis for suppression.

KEY QUOTATIONS

“When Officer Hossain entered the car to conduct his search, he had nothing more than a hunch that it might contain evidence of Mr. Darkwah’s crime of arrest. The Fourth Amendment requires more.” (27)

“A per se rule would flout that requirement by allowing the police to search a vehicle’s passenger compartment incident to arrest even when it is wholly unreasonable to believe that evidence of the offense of arrest is inside.” (20)

FACTUAL BACKGROUND

MPD officers stopped Abbie Kujabi's vehicle after observing what they believed were violations of Virginia and District of Columbia license-plate requirements. During the stop, passenger Phil Darkwah fled while clutching his waistband, and officers later found a firearm along his flight path and arrested him. Without a warrant, Officer Hossain searched Kujabi's vehicle after Darkwah's arrest and found marijuana or THC products and a loaded firearm under the driver's seat. The officers had not observed evidence connecting Darkwah's firearm-possession offense to Kujabi's vehicle, and a preliminary plain-view inspection had revealed no such evidence.

PROCEDURAL HISTORY

A grand jury indicted Kujabi and Phil Darkwah under 18 U.S.C. § 922(g)(1). Kujabi moved to suppress evidence and statements; Darkwah initially joined the motion but later pleaded guilty. After briefing and a December 2025 evidentiary hearing, the court ruled on Kujabi's suppression motion.

DISPOSITION

other

REMAND INSTRUCTIONS

None. The motion to suppress physical evidence was granted; the motion to suppress statements was denied without prejudice to refile; and Darkwah's motion to join was denied as moot.

CASES CITED

- United States v. Weaver, 808 F.3d 26, 33 (D.C. Cir. 2015)
- Utah v. Strieff, 579 U.S. 232, 237 (2016)
- Arizona v. Gant, 556 U.S. 332, 338, 343, 351 (2009)
- Terry v. Ohio, 392 U.S. 1, 16-27 (1968)
- Whren v. United States, 517 U.S. 806, 810 (1996)
- Rodriguez v. United States, 575 U.S. 348, 354-57 (2015)
- United States v. Vinton, 594 F.3d 14, 19-27 (D.C. Cir. 2010)
- United States v. Delaney, 955 F.3d 1077, 1081, 1086 (D.C. Cir. 2020)
- United States v. Castle, 825 F.3d 625, 634-35 (D.C. Cir. 2016)
- United States v. Washington, 670 F.3d 1321, 1325 (D.C. Cir. 2012)
- Illinois v. Wardlow, 528 U.S. 119, 124-25 (2000)
- Wyoming v. Houghton, 526 U.S. 295, 304-05 (1999)
- United States v. Christian, 187 F.3d 663, 668-69 (D.C. Cir. 1999)
- United States v. Edmonds, 240 F.3d 55, 61-62 (D.C. Cir. 2001)
- Brown v. Illinois, 422 U.S. 590, 599-604 (1975)
- Wong Sun v. United States, 371 U.S. 471, 484-87 (1963)
- United States v. Holmes, 505 F.3d 1288, 1294 (D.C. Cir. 2007)
- United States v. Sheffield, 832 F.3d 296, 303 (D.C. Cir. 2016)
- In re Grand Jury Investigation, 916 F.3d 1047, 1053 (D.C. Cir. 2019)
- Jam v. International Finance Corp., 3 F.4th 405, 409-10 (D.C. Cir. 2021)
- Missouri v. McNeely, 569 U.S. 141, 158 (2013)
- United States v. Bailey, 622 F.3d 1, 6 (D.C. Cir. 2010)
- Heien v. North Carolina, 574 U.S. 54, 62-67 (2014)
- United States v. Southerland, 486 F.3d 1355, 1358-59 (D.C. Cir. 2007)

