

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States v. Pelice

United States v. Pelice · No. Criminal Action No. 22-246 (JDB) · Decided December 10, 2025

SUMMARY

The United States District Court for the District of Columbia denies Jean Pelice’s motion to suppress statements made during interviews with U.S. law enforcement in the Dominican Republic and the United States. The court finds that the April 28, 2022 interview was voluntary and non-custodial for Miranda purposes, and that the July 8, 2022 statements were voluntary, preceded by Miranda warnings, and followed by a valid waiver.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	John D. Bates
JURISDICTION	United States District Court for the District of Columbia
DECIDED	December 10, 2025
DOCKET	Criminal Action No. 22-246 (JDB)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to suppress statements made during interviews with U.S. law enforcement, arguing that the statements were involuntary and that the April 28, 2022 interview violated Miranda. The district court held an evidentiary hearing and denied the motion.
STANDARD OF REVIEW	The government bears the burden of proving voluntariness and Miranda waiver by a preponderance of the evidence. Voluntariness is assessed under the totality of the circumstances, and custody is determined under the objective circumstances of the interrogation.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the District of Columbia but not binding on other courts.
PARTIES	Jean Pelice v. United States

TOPICS

- suppression of evidence
- miranda rights
- criminal procedure
- due process
- fifth amendment

PRACTICE AREAS

criminal procedure

constitutional law

evidence

QUESTIONS PRESENTED

1. Whether Pelice's April 28, 2022 statements in Santo Domingo were involuntary under the Due Process Clause.
2. Whether the April 28 interview was a custodial interrogation requiring Miranda warnings.
3. Whether Pelice's July 8, 2022 statements were involuntary under the totality of the circumstances.
4. Whether Pelice received and waived his Miranda rights before the July 8 interview.

HOLDINGS

1. The April 28 statements were voluntary because the record showed no coercive police activity or egregious facts sufficient to overbear Pelice's will.
2. Pelice was not in custody during the April 28 interview, so Miranda warnings were not required and no Miranda violation occurred.
3. Pelice's July 8 statements were voluntary.
4. Pelice received Miranda warnings before the July 8 interview and waived those rights by making an uncoerced statement without invoking them.

KEY QUOTATIONS

"The facts of the April 28 interview fall in between Mathiason and Yarborough and the Court therefore finds that the interview was non-custodial." (at 10)

"Thus, the Court finds that Pelice was read his Miranda rights before the July 8 interview and that he waived those rights." (at 12)

FACTUAL BACKGROUND

Pelice, charged in connection with the kidnapping of U.S. missionaries in Haiti, voluntarily met with U.S. and Dominican law-enforcement personnel in Santo Domingo on April 28, 2022. He was not restrained, was told the interview was voluntary and could be stopped, was accompanied by his wife, and left with Dominican personnel after the interview; no Miranda warnings were given. After his later arrest in the United States, Pelice was interviewed on July 8, 2022, after receiving oral Miranda warnings in Haitian Creole and having opportunities to consult privately with his attorney.

PROCEDURAL HISTORY

Pelice was charged with hostage taking, conspiracy, and aiding and abetting under 18 U.S.C. §§ 1203(a) and 2. He moved to suppress statements from an April 28, 2022 interview in Santo Domingo and a July 8, 2022 interview in the United States. After a December 4, 2025 suppression hearing, the court found the statements voluntary, determined that the April interview was noncustodial, and found that Pelice received and waived Miranda rights before the July interview.

DISPOSITION

other

CASES CITED

- *Miranda v. Arizona*, 384 U.S. 436 (1966)
- *Jackson v. Denno*, 378 U.S. 368, 376-77 (1964)
- *United States v. Neely*, 124 F.4th 937, 951 (D.C. Cir. 2024)
- *Mincey v. Arizona*, 437 U.S. 385, 397-98, 401 (1978)
- *Colorado v. Connelly*, 479 U.S. 157, 167-68 (1986)
- *Lego v. Twomey*, 404 U.S. 477, 483-88 (1972)
- *United States v. Roberson*, 573 F. Supp. 3d 209, 217-19 (D.D.C. 2021)
- *United States v. Murdock*, 667 F.3d 1302, 1305-07 (D.C. Cir. 2012)
- *Schneekloth v. Bustamonte*, 412 U.S. 218, 226 (1973)
- *Culombe v. Connecticut*, 367 U.S. 568, 602 (1961)
- *United States v. Avitan*, 349 F. Supp. 3d 23, 34-36 (D.D.C. 2018)
- *United States v. Mohammed*, 693 F.3d 192, 198 (D.C. Cir. 2012)
- *Chambers v. Florida*, 309 U.S. 227, 235-38 (1940)
- *Ashcraft v. Tennessee*, 322 U.S. 143, 153 (1944)
- *United States v. Hallford*, 816 F.3d 850, 858-59 (D.C. Cir. 2016)
- *Rhode Island v. Innis*, 446 U.S. 291, 301 (1980)
- *Howes v. Fields*, 565 U.S. 499, 509-12 (2012)
- *Oregon v. Mathiason*, 429 U.S. 492, 495 (1977)
- *Yarborough v. Alvarado*, 541 U.S. 652, 664-65 (2004)
- *Berkemer v. McCarty*, 468 U.S. 420, 438 (1984)
- *Illinois v. Perkins*, 496 U.S. 292, 297 (1990)
- *Maryland v. Shatzer*, 559 U.S. 98, 106 (2010)
- *Berghuis v. Thompson*, 560 U.S. 370, 382-89 (2010)
- *Moran v. Burbine*, 475 U.S. 412, 421 (1986)
- *North Carolina v. Butler*, 441 U.S. 369, 373, 376 (1979)