

SUPERIOR COURT OF PENNSYLVANIA

Commonwealth v. Abdul-Ali

2025 Pa. Super. 70 (Superior Court of Pennsylvania 2025) · No. 588 MDA 2024 · Decided March 24, 2025

SUMMARY

The Pennsylvania Superior Court affirmed Jared Rahim Abdul-Ali’s judgment of sentence following convictions for first-degree murder and related offenses. The court addressed the suppression of statements made after Abdul-Ali invoked his rights to remain silent and to counsel, applying *Michigan v. Mosley* and *Edwards v. Arizona*, and reviewed the admission of prior abuse and protection-from-abuse evidence. The opinion affirmed the trial court’s rulings.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Beck, J.; Lazarus, P.J.; Bender, P.J.E.
JURISDICTION	Pennsylvania Superior Court
DECIDED	March 24, 2025
DOCKET	588 MDA 2024
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a judgment of sentence entered by the Schuylkill County Court of Common Pleas after a jury convicted Abdul-Ali of first-degree murder, aggravated assault, strangulation, and endangering the welfare of a child.
STANDARD OF REVIEW	The appellate court reviews suppression rulings to determine whether factual findings are supported by the record and whether the legal conclusions drawn from those facts are correct, viewing the evidence in the light most favorable to the prosecution as prevailing party below. Admission of prior-bad-acts evidence is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	Published precedential opinion of the Superior Court of Pennsylvania
PARTIES	Jared Rahim Abdul-Ali v. Commonwealth of Pennsylvania

TOPICS

- suppression of evidence
- miranda rights
- right to counsel
- criminal procedure
- evidence

PRACTICE AREAS

criminal procedure

constitutional criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether police scrupulously honored Abdul-Ali's Fifth Amendment right to remain silent when they asked three days later whether he would resume speaking after his initial invocation.
2. Whether statements made after Abdul-Ali invoked his right to counsel were admissible because he thereafter initiated further communication with police.
3. Whether the trial court abused its discretion under Pennsylvania Rule of Evidence 404(b) by admitting limited evidence concerning Abdul-Ali's prior abuse of Duckett, the protection-from-abuse order, and the underlying injury.

HOLDINGS

1. Police scrupulously honored Abdul-Ali's right to remain silent by immediately ending the February 13 interrogation, waiting three days, giving fresh Miranda warnings, telling him he did not have to speak, and asking whether he was agreeable to resuming the conversation without coercion. Statements made during the February 16 interview up to his later invocation of the right to silence were admissible.
2. Statements made after Abdul-Ali invoked his right to counsel were admissible because he initiated further communication with police by asking how the Commonwealth would prove what happened, offering to show officers where he had slept, and expressly agreeing to talk again.
3. The trial court did not abuse its discretion by admitting limited evidence of the protection-from-abuse order, the prior simple-assault conviction, the victim's observed injury, and a recent incident of abuse because the evidence was relevant to motive, malice, intent, ill will, and the history and natural development of the relationship, and its probative value outweighed its potential for unfair prejudice.

KEY QUOTATIONS

“Instead of affording any one factor dispositive weight, we held that “a suppression court reviewing a statement made after the defendant’s initial invocation of the right to remain silent must recognize as pivotal the purpose for which the renewed interrogation was conducted and the circumstances under which it occurred.”” (2025 Pa. Super. 70, at 19-20)

“The Constitution does not forbid officers from asking a suspect if they would like to speak.” (2025 Pa. Super. 70, at 21-22)

“The challenged evidence shows the chain or sequence of events that formed the history of the case, is part of the natural development of the case, and demonstrates Drumheller’s motive, malice, intent, and ill-will toward Huttenstine.” (2025 Pa. Super. 70, at 27-28)

FACTUAL BACKGROUND

The victim, Destiny Duckett, was found dead in her apartment on February 13, 2023, with evidence of ligature and manual strangulation and substantial force applied to her chest. Abdul-Ali, who was subject to a protection-

from-abuse order involving Duckett, voluntarily accompanied police for questioning, received Miranda warnings, and invoked his rights to silence and later to counsel during successive interviews. After he reinitiated communication with police, he made additional incriminating statements. At trial, the Commonwealth also introduced surveillance footage, evidence from Abdul-Ali's phone searches, and limited evidence of prior abuse involving Duckett.

PROCEDURAL HISTORY

Abdul-Ali moved to suppress statements made during multiple police interviews and sought to exclude evidence concerning prior abuse of the victim. The trial court granted the suppression motion in part, suppressing statements made after an invocation of the right to silence until Abdul-Ali reinitiated communication, but denied suppression in other respects. The trial court also admitted limited evidence concerning a protection-from-abuse order, a prior simple-assault conviction, the victim's injury, and a recent abuse incident. Following conviction and sentencing, Abdul-Ali appealed, and the Superior Court affirmed.

DISPOSITION

affirmed

CASES CITED

- *Miranda v. Arizona*, 384 U.S. 436 (1966)
- *Commonwealth v. Reed*, 971 A.2d 1216 (Pa. 2009)
- *Michigan v. Mosley*, 423 U.S. 96 (1975)
- *Commonwealth v. Russell*, 938 A.2d 1082 (Pa. Super. 2007)
- *Edwards v. Arizona*, 451 U.S. 477 (1981)
- *Texas v. Cobb*, 532 U.S. 162 (2001)
- *Commonwealth v. Henry*, 599 A.2d 1321 (Pa. Super. 1991)
- *Commonwealth v. Harris*, 972 A.2d 1196 (Pa. Super. 2009)
- *Commonwealth v. Mignogna*, 585 A.2d 1 (Pa. Super. 1990)
- *United States v. Washington*, 431 U.S. 181 (1977)
- *Oregon v. Bradshaw*, 462 U.S. 1039 (1983)
- *In re L.J.*, 79 A.3d 1073 (Pa. 2013)
- *Commonwealth v. Kinard*, 95 A.3d 279 (Pa. Super. 2014) (en banc)
- *Commonwealth v. Drumheller*, 808 A.2d 893 (Pa. 2002)