

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States v. Johnson

Criminal No. 2025-0262 (TNM) (D.D.C. Jan. 9, 2026) · No. 1:25-cr-262 (TNM) · Decided January 9, 2026

SUMMARY

The U.S. District Court for the District of Columbia denied Tuano Michael Johnson’s motion to suppress a firearm discovered during an inventory search of his vehicle. The court held that the U.S. Capitol Police officer followed department policy when impounding and inventorying the vehicle, and therefore the search was reasonable under the Fourth Amendment.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Trevor N. McFadden
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 9, 2026
DOCKET	1:25-cr-262 (TNM)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to suppress a firearm discovered during an inventory search of his vehicle. The district court held a suppression hearing, considered testimony and record evidence, and denied the motion.
STANDARD OF REVIEW	The court evaluated the reasonableness of the search under the Fourth Amendment and reviewed the factual record from the suppression hearing, including credibility determinations.
PRECEDENTIAL VALUE	Published district court memorandum order; persuasive within the jurisdiction but not binding precedent in the manner of a court of appeals or Supreme Court decision.
PARTIES	United States of America

TOPICS

- suppression of evidence
- fourth amendment
- search and seizure
- criminal procedure
- warrant requirement

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the officer's decision to tow and inventory-search Johnson's vehicle violated the Capitol Police standard operating procedure.
2. Whether the inventory search violated the Fourth Amendment because the vehicle was towed to a private lot and Johnson was not offered the opportunity to accompany the tow.
3. Whether the firearm discovered during the inventory search should be suppressed as fruit of an unconstitutional search.

HOLDINGS

1. The officer's decision to have the vehicle towed and impounded triggered the policy's requirement that the vehicle and its contents be inspected and inventoried. An impoundment does not require use of a government-owned tow truck or storage on government property; in any event, the policy independently applied when the vehicle was towed.
2. The Capitol Police policy did not require the officer to offer Johnson the opportunity to accompany the vehicle before conducting the inventory search. Because Johnson did not accompany the tow, the policy's exception for a vehicle accompanied by its owner or operator did not apply.
3. The inventory search was constitutionally reasonable because it complied with applicable Capitol Police standardized procedures and no listed exception applied.

KEY QUOTATIONS

“inventory searches must follow standard procedure, if one exists.” (4)

“Because Officer Carll followed departmental policy in conducting an inventory search, he conducted a constitutionally reasonable search.” (5)

“Because Officer Carll followed applicable policy in conducting an inventory search, no Fourth Amendment violation occurred.” (9)

FACTUAL BACKGROUND

A U.S. Capitol Police officer stopped Johnson after observing his vehicle being driven with expired temporary tags. Johnson had only a Maryland learner's permit and lacked registration, insurance, and a licensed driver; the vehicle was unregistered and obstructed traffic. The officer ordered the vehicle towed and began an inventory search under Capitol Police policy, discovering a firearm in the glove compartment. Johnson argued that the officer violated department procedures by failing to offer him the opportunity to accompany the tow.

PROCEDURAL HISTORY

Johnson was charged by criminal complaint and then indicted for unlawful possession of a firearm and ammunition by a convicted felon under 18 U.S.C. § 922(g)(1). He moved to suppress the firearm discovered

after a U.S. Capitol Police officer ordered his vehicle towed and conducted an inventory search. Following briefing and a December 12, 2025 motions hearing, the court denied the motion.

DISPOSITION

other

CASES CITED

- Caniglia v. Strom, 593 U.S. 194, 198 (2021)
- United States v. Hensley, 469 U.S. 221, 226 (1985)
- Carroll v. United States, 267 U.S. 132, 153-54 (1925)
- South Dakota v. Opperman, 428 U.S. 364, 372-73 (1976)
- Colorado v. Bertine, 479 U.S. 367, 372, 374 n.6 (1987)
- United States v. Proctor, 489 F.3d 1348, 1352, 1354-55 (D.C. Cir. 2007)
- United States v. Ashe, 62 F. App'x 446, 447 (4th Cir. 2003)
- United States v. McClellan, 38 F.3d 1217 (6th Cir. 1994) (unpublished table decision)
- Taken Alive v. Litau, 551 F.2d 196, 197 (8th Cir. 1977)
- United States v. Hellman, 556 F.2d 442, 443 (9th Cir. 1977)
- Eaton v. Whetsel, 283 F. App'x 599, 600 (10th Cir. 2008)
- City of W. Covina v. Perkins, 525 U.S. 234, 240-41 (1999)
- United States v. Kubrick, 444 U.S. 111, 122 (1979)
- Schneckloth v. Bustamonte, 412 U.S. 218, 227, 240-42 (1973)
- Miranda v. Arizona, 384 U.S. 436, 49-70 (1966)

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