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People of the State of San Andreas, Plaintiff-Appellant,

v.

Jeffrey B. Tran, Defendant-Appellee.

No. 25CA4165.

Supreme Court of San Andreas.

February 26, 2026.

Interlocutory Appeal from the District Court Los Santos County District Court Case No. 24CR1187 Honorable Michael Browner, Judge.

Attorneys for Plaintiff-Appellant: Rebecca C. Navarro, Attorney General, State of San Andreas. Jeffrey S. Allen, District Attorney Los Santos, San Andreas.

Attorneys for Defendant-Appellee: Maria L. Nguyen, Nguyen & Patel Criminal Defense Group Los Santos, San Andreas.

En Banc.

JUSTICE MIDDLETON delivered the Opinion of the Court, in which CHIEF JUSTICE MORGAN, JUSTICE CORTEZ, JUSTICE HALL, JUSTICE MCDOWELL, and JUSTICE BENNETT joined. JUSTICE SPRINGER delivered the Concurring Opinion.

OPINION OF THE COURT

MIDDLETON, Justice.

¶1 This case requires the Court to determine whether questioning conducted during a roadside traffic stop constitutes custodial interrogation requiring the administration of Miranda warnings under Article II, Section 5 of the San Andreas Constitution. The defendant contends that continued questioning following completion of the initial purpose of a traffic stop transformed the encounter into custody. We conclude that it did not.

¶2 Article II, Section 5 guarantees that no person shall be compelled in any criminal case to be a witness against themselves. Although the Constitution of San Andreas contains no statutory codification governing Miranda warnings, this Court has consistently interpreted the privilege against self-incrimination in harmony with persuasive federal constitutional

authority interpreting analogous provisions of the Fourth and Fifth Amendments to the United States Constitution.

¶3 The constitutional safeguard addressed in *Miranda v. Arizona* applies only where interrogation occurs under custodial conditions. The dispositive inquiry, therefore, is not whether questioning occurred, but whether the defendant was subjected to custody at the time statements were made.

¶4 The United States Supreme Court has repeatedly distinguished between custodial interrogation and temporary investigative detention. In *Berkemer v. McCarty*, the Court held that ordinary traffic stops do not constitute custody for *Miranda* purposes because such encounters are presumptively temporary, occur in public view, and lack the inherently coercive atmosphere associated with formal arrest.

¶5 A traffic stop unquestionably constitutes a seizure under constitutional law. A motorist is not free to depart while an officer conducts a lawful stop. Yet constitutional seizure and *Miranda* custody are not interchangeable concepts. The temporary restraint inherent in investigative detention does not alone create the level of compulsion contemplated by the privilege against self-incrimination.

¶6 The distinction reflects practical reality. Traffic enforcement represents one of the most common interactions between citizens and law enforcement. These encounters are brief interruptions intended to address observed violations and promote roadway safety. A reasonable motorist understands such stops as limited governmental inquiries rather than the initiation of formal criminal custody.

¶7 Constitutional reasonableness nonetheless imposes clear limits upon the authority to detain. A traffic stop must remain justified by its initiating purpose and must be limited in duration to addressing the observed violation and related safety concerns. Once the officer has completed the disposition of the traffic offense, continued detention absent justification risks violating constitutional protections against unreasonable seizure.

¶8 Completion of a citation or warning ordinarily marks the conclusion of the original mission of the stop. At that point, the motorist should be permitted to proceed without unnecessary delay. The Constitution does not authorize indefinite roadside detention.

¶9 However, constitutional policing does not require officers to disregard developing circumstances encountered during a lawful stop. Where additional facts arise giving rise to reasonable suspicion of separate criminal conduct—including impairment, narcotics possession, or alcohol-related offenses—officers possess both authority and responsibility to investigate those suspected violations.

¶10 Investigation of newly arising criminal activity does not automatically convert an investigative detention into custodial interrogation. Law enforcement officers routinely

confront evolving circumstances during roadside encounters, and the Constitution permits reasonable inquiry proportionate to those observations.

¶11 The defendant urges adoption of a rule under which custody begins automatically once the initial traffic purpose concludes. Such a rule would collapse the distinction between investigative detention and arrest recognized in longstanding constitutional doctrine. Nearly every extended traffic encounter would become custodial interrogation requiring Miranda warnings regardless of actual restraint.

¶12 Neither constitutional text nor persuasive precedent supports such a categorical approach. Miranda safeguards were designed to address interrogation environments dominated by police authority, isolation, and psychological pressure equivalent to formal arrest. Routine roadside questioning does not ordinarily present those characteristics.

¶13 Traffic stops occur in public settings visible to passing motorists and bystanders. The presence of public observation serves as a meaningful restraint upon coercive conduct and diminishes the isolating pressures that animated the concerns underlying Miranda.

¶14 Custody arises only when the restraint imposed upon an individual reaches the functional equivalent of formal arrest. Relevant considerations include physical restraint, transportation from the scene, prolonged isolation, or express communication that compliance is no longer voluntary. Absent such circumstances, roadside inquiry remains investigative rather than custodial.

¶15 The duration of a stop, while relevant to Fourth Amendment reasonableness, does not alone establish custody. An unlawfully prolonged detention may warrant suppression under seizure principles, but constitutional violations governing unreasonable detention and custodial interrogation remain analytically distinct inquiries.

¶16 The privilege against self-incrimination protects individuals from compelled testimonial evidence arising from custodial authority. It does not prohibit officers from asking questions during lawful investigative encounters where arrest-level restraint has not occurred.

¶17 Here, Tran was stopped for failure to signal. The officer verified identification, conducted routine checks, and issued a citation resolving the initial violation. During the encounter, observations made by the officer gave rise to suspicion of narcotics activity, prompting additional questioning.

¶18 Tran remained roadside in a public environment. He was not handcuffed, transported, or informed that he was under arrest. No weapons were displayed, and no restraint equivalent to formal custody was imposed. Under these circumstances, a reasonable person would understand the encounter as continuing investigation rather than arrest.

¶19 The officer's decision to pursue inquiry into suspected narcotics activity fell within the permissible scope of investigative policing. Officers are not constitutionally required to

terminate inquiry upon issuance of a citation when independent suspicion of criminal conduct arises during the encounter.

¶20 At the same time, we emphasize that traffic stops generally shall not be prolonged beyond what is reasonably necessary to address the initial violation or newly arising, articulable suspicion. Investigations must remain focused and limited in duration. Prolongation undertaken solely to elicit incriminating statements unrelated to lawful investigation is impermissible.

¶21 Properly understood, constitutional protections operate along parallel tracks. The Fourth Amendment regulates the reasonableness and duration of detention, while the privilege against self-incrimination governs interrogation conducted under custodial authority. Conflating these doctrines risks expanding Miranda beyond its constitutional foundation.

¶22 Because Tran was not subjected to restraints equivalent to formal arrest at the time questioning occurred, he was not in custody for purposes of Article II, Section 5. Miranda warnings were therefore not constitutionally required prior to questioning.

¶23 The admission of Tran's statements did not violate the constitutional privilege against self-incrimination. Any challenge concerning duration of detention sounds in seizure analysis rather than custodial interrogation doctrine.

¶24 Our holding preserves the constitutional balance between individual liberty and legitimate law enforcement responsibility. Traffic stops must remain reasonable and limited, yet officers retain authority to investigate criminal conduct that emerges during lawful encounters.

¶25 Accordingly, we hold that ordinary traffic stops do not constitute custodial interrogation requiring Miranda warnings unless the encounter escalates to the functional equivalent of formal arrest.

I. Facts and Procedural History

¶26 Jeffrey Tran was stopped by law enforcement for failure to signal while operating a motor vehicle. The officer verified identification, conducted a warrant check, and issued a citation resolving the initial traffic violation. During the encounter, the officer observed indicators giving rise to suspicion of narcotics activity and continued questioning related to possible drug possession.

¶27 Tran was not advised that he was under arrest, nor was he physically restrained or removed from the roadside location. During questioning, Tran made statements admitting

possession of controlled substances. A subsequent search resulted in recovery of contraband.

¶28 Tran moved to suppress his statements, arguing that continued questioning following completion of the traffic stop constituted custodial interrogation. The district court denied the motion, and the Court of Appeals affirmed. We granted review to clarify the relationship between traffic stops and custodial interrogation under Article II, Section 5.

II. United States Supreme Court Precedent Governing Traffic Stops and Custodial Interrogation

¶29 Although the Constitution of San Andreas contains no statutory analogue to the Miranda warning requirement, Article II, Section 5 closely parallels the protections afforded by the Fourth and Fifth Amendments to the United States Constitution. In determining when roadside questioning becomes custodial interrogation, this Court therefore looks to decisions of the United States Supreme Court interpreting those provisions as persuasive constitutional authority.

¶30 In *Miranda v. Arizona*, 384 U.S. 436 (1966), the United States Supreme Court established that procedural safeguards are required when a suspect is subjected to custodial interrogation. The Court emphasized that Miranda protections are triggered not by questioning alone, but by interrogation conducted under conditions presenting pressures equivalent to formal arrest. The decision addressed inherently coercive, police-dominated environments rather than ordinary investigative encounters.

¶31 The distinction between investigative detention and custody was further clarified in *Terry v. Ohio*, 392 U.S. 1 (1968), which recognized that law enforcement officers may briefly detain individuals for investigative purposes upon reasonable suspicion of criminal activity. Such temporary detentions constitute seizures but do not amount to arrest-level custody.

¶32 Applying these principles to traffic enforcement, the Court in *Berkemer v. McCarty*, 468 U.S. 420 (1984), held that routine traffic stops ordinarily do not constitute custodial interrogation for purposes of Miranda. The Court reasoned that roadside stops are presumptively temporary, occur in public view, and lack the isolating pressures associated with stationhouse interrogation. Custody arises only when restraint becomes comparable to formal arrest.

¶33 The Court reaffirmed this distinction in *Pennsylvania v. Bruder*, 488 U.S. 9 (1988), concluding that roadside questioning during a traffic investigation remains noncustodial absent arrest-like restraint. Brief investigative questioning related to suspected intoxication did not require Miranda warnings.

¶34 In *Stansbury v. California*, 511 U.S. 318 (1994), the Court clarified that custody depends upon an objective assessment of how a reasonable person would perceive the encounter,

rather than the subjective intent of law enforcement officers. The inquiry focuses upon the degree of restraint experienced by the suspect.

¶35 The Court later emphasized in *Howes v. Fields*, 565 U.S. 499 (2012), that custody is not determined solely by restriction of movement. Even significant limitations on freedom do not establish custody unless circumstances create pressures comparable to formal arrest. The totality of circumstances remains controlling.

¶36 Fourth Amendment doctrine likewise limits the permissible duration of traffic stops. In *Arizona v. Johnson*, 555 U.S. 323 (2009), the Court explained that a lawful traffic stop continues for the time reasonably required to complete its mission and address related safety concerns. Temporary detention alone does not transform an encounter into custodial interrogation.

¶37 Most recently, *Rodriguez v. United States*, 575 U.S. 348 (2015), held that traffic stops may not be prolonged beyond their original mission absent independent reasonable suspicion. *Rodriguez* governs the reasonableness of detention under seizure principles but does not redefine custody for purposes of *Miranda*. A violation of duration limits implicates the Fourth Amendment rather than automatically triggering Fifth Amendment custody.

¶38 Taken together, these decisions establish a consistent constitutional framework. Traffic stops constitute investigative detentions governed primarily by reasonableness standards. *Miranda* safeguards attach only when an encounter escalates beyond temporary roadside investigation into conditions functionally equivalent to arrest.

¶39 This Court adopts those principles as persuasive authority in interpreting Article II, Section 5. The federal cases collectively confirm that temporary roadside questioning—even where a motorist is not free to leave—does not alone constitute custodial interrogation.

III. Application of Federal Principles to Article II, Section 5

¶40 The foregoing precedent confirms the analytical distinction central to this case: constitutional seizure and custodial interrogation are related but independent doctrines. The Fourth Amendment regulates whether a stop is justified and reasonably limited in duration, while the privilege against self-incrimination governs interrogation conducted under arrest-like restraint.

¶41 Accordingly, the existence of a lawful traffic stop, or even a detention later determined to be unreasonably prolonged, does not automatically establish custody requiring *Miranda* warnings. Custody arises only when governmental authority imposes restraints comparable to formal arrest.

¶42 Consistent with these controlling principles, ordinary traffic stops—properly limited in duration and investigative purpose—remain noncustodial encounters under Article II, Section 5.

IV. Conclusion

¶43 The question presented in this case lies at the intersection of two enduring constitutional principles: the protection of individuals from compelled self-incrimination and the authority of law enforcement officers to conduct reasonable investigative activity necessary to ensure public safety. The Constitution safeguards both interests. It neither permits the State to extract incriminating statements through custodial coercion nor requires officers to abandon legitimate investigation whenever routine encounters develop into broader inquiries supported by observable facts.

¶44 Traffic stops occupy a constitutionally distinct category of police interaction. They involve temporary restraint justified by regulatory enforcement and roadway safety concerns rather than the formal accusation and domination associated with arrest. Although a motorist is not free to depart during a lawful stop, that limitation alone does not create the degree of compulsion contemplated by Article II, Section 5. Custodial interrogation arises only when governmental authority imposes restraints comparable to formal arrest—conditions marked by isolation, sustained control, or circumstances communicating that the individual's freedom has been definitively curtailed.

¶45 The constitutional framework governing these encounters therefore depends upon maintaining a clear analytical distinction between investigative detention and custody. The Fourth Amendment regulates whether a stop is justified and reasonably limited in duration, while the privilege against self-incrimination governs questioning conducted under arrest-like restraint. Conflating these doctrines would expand Miranda beyond its constitutional foundation and risk transforming routine policing encounters into custodial events irrespective of actual coercion.

¶46 At the same time, today's holding must not be read as granting unrestricted authority to prolong roadside encounters. Traffic stops generally shall remain limited in duration and focused upon resolving the initial violation or investigating newly arising, articulable suspicion of criminal conduct. Officers may not extend detention solely to obtain incriminating admissions unrelated to lawful investigation. Constitutional protections against unreasonable seizure remain fully operative and continue to provide meaningful limits upon governmental authority.

¶47 The rule announced today reflects both constitutional fidelity and practical necessity. Law enforcement officers must retain the ability to respond to evolving circumstances encountered during lawful stops, including indications of impairment, narcotics activity, or other criminal violations discovered in the course of investigation. Requiring Miranda

warnings whenever questioning extends beyond issuance of a citation would improperly equate temporary roadside inquiry with formal arrest and impose obligations unsupported by constitutional text or persuasive precedent.

¶48 Applying these principles to the present case, the defendant was subjected to a public, temporary roadside detention that never escalated to restraints equivalent to formal custody. The questioning at issue arose from developing suspicion encountered during a lawful stop and remained investigative in character. Because the defendant was not in custody at the time statements were made, Article II, Section 5 did not require the administration of Miranda warnings.

¶49 The Constitution demands vigilance against coercion, not the abandonment of reasonable investigation. By preserving the distinction between investigative detention and custodial interrogation, today's decision ensures that constitutional protections remain meaningful while allowing lawful policing to function within clearly defined limits.

¶50 The judgment of the Court of Appeals is therefore affirmed.

CONCURRING OPINION

SPRINGER, Justice.

¶51 I join the Court's opinion in full and agree that the questioning conducted during the traffic stop in this case did not constitute custodial interrogation requiring the administration of Miranda warnings under Article II, Section 5 of the San Andreas Constitution. I write separately to emphasize two principles that, in my view, warrant clarification as roadside encounters increasingly occupy the intersection between investigative detention and constitutional compulsion.

¶52 First, today's decision should not be understood as diminishing the substantive protections recognized under Article II, Section 5. The privilege against self-incrimination remains a structural limitation on governmental authority. Our recent decision in *Carter v. Alameda County* reaffirmed that constitutional protections attach wherever state power creates conditions capable of compelling an individual to contribute to their own prosecution. Nothing in today's holding retreats from that principle.

¶53 The question presented here differs fundamentally from *Carter*. There, custody was undisputed; the issue concerned how the State may use silence once custodial interrogation begins. In contrast, *People v. Tran* concerns whether custody existed at all. The distinction is critical. Constitutional protections against compelled self-incrimination presuppose custodial authority. Without custody, the risk of compulsion addressed by *Miranda* does not arise in the same constitutional sense.

¶54 Traffic stops occupy a unique position within constitutional law. They involve temporary restraint imposed for regulatory and safety purposes rather than the accusatory focus characteristic of arrest. A motorist stopped for a traffic violation reasonably anticipates investigation limited in scope and duration. The public setting, brevity of the encounter, and absence of physical isolation substantially reduce the coercive pressures that animated Miranda's creation.

¶55 At the same time, modern policing realities caution against rigid categorical assumptions. Traffic stops may, through escalation, evolve into circumstances indistinguishable from arrest. Multiple officers, prolonged detention, physical restraint, relocation from the scene, or authoritative declarations restricting departure may collectively transform an investigative encounter into custody. Courts must therefore remain attentive to functional realities rather than formal labels.

¶56 I therefore underscore that today's holding establishes no blanket immunity from constitutional scrutiny. The absence of custody in routine traffic enforcement does not authorize investigative practices designed to circumvent constitutional safeguards. Where officers deliberately prolong detention or impose restraints approximating arrest in order to obtain unwarned admissions, Article II, Section 5 remains fully operative.

¶57 Second, it is important to maintain analytical clarity between Fourth Amendment reasonableness and Fifth Amendment compulsion. The defendant's argument illustrates a recurring doctrinal confusion: that an unlawfully prolonged stop necessarily becomes custodial interrogation. The United States Supreme Court has consistently rejected such conflation, and rightly so.

¶58 A detention may violate constitutional limits governing unreasonable seizure without simultaneously creating Miranda custody. The remedies and constitutional interests involved differ. The Fourth Amendment protects freedom of movement; the privilege against self-incrimination protects freedom of conscience. Each doctrine performs a distinct role within constitutional structure.

¶59 Preserving that distinction promotes both liberty and administrability. Law enforcement officers must understand when warnings are constitutionally required, and trial courts must apply standards capable of consistent application. Expanding custody to encompass all extended investigative detentions would risk transforming routine policing encounters into formal arrest equivalents without meaningful doctrinal guidance.

¶60 Finally, I emphasize that the Constitution imposes reciprocal obligations. Officers must conduct traffic stops diligently and without unnecessary delay, while courts must ensure that investigative authority does not gradually assume the character of custodial dominance. The legitimacy of roadside enforcement depends upon adherence to both requirements.

¶61 Because the encounter in this case remained public, temporary, and investigative—and because the defendant was not subjected to restraints equivalent to formal arrest—I agree that Miranda warnings were not required and that the judgment should be affirmed.

¶62 For these reasons, I respectfully concur.