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Ninth Circuit Rejects Fifth Amendment Compulsion Theory Where Police Properly Mirandize in United States v. Watson

By **Daigle Law Group**

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Ninth Circuit Rejects Fifth Amendment Compulsion Theory Where Police Properly Mirandize in *United States v. Watson*

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In a recent case, the United States Court of Appeals for the Ninth Circuit released a decision in *United States v. Watson*, a case that highlights a parolee's rights during law enforcement investigations and considers the boundaries of compelled statements under the Fifth Amendment.

Summary of the Facts

In May 2022, Federal Drug Administration agents and the Nampa Police Department began investigating Tyler Jay Watson for drug trafficking. A confidential informant disclosed that Watson, a parolee, was distributing narcotics that were transported in hidden magnetic boxes under his vehicle and was using multiple addresses. The addresses included his mother's current registered home and a previous address at his grandmother's house. Task force members worked to corroborate the CI's tips through intercepted communications between Watson and his supplier. Together, they gathered substantial evidence that Watson was trafficking significant quantities of fentanyl, with payments reaching at least \$15,000 per week to his supplier.

Upon verifying Watson's parole status with Idaho Department of Corrections officers, the task force coordinated with probation and parole officers to plan and conduct a parole compliance search. This was legally supported by Watson's signed parole supervision agreement, which prohibited drug possession and use, authorized searches by Idaho Department of Corrections agents or law enforcement, and required him to be cooperative and truthful with probation and parole officers. During the planned operation, Nampa Police Officer Jared Scott saw Watson make a turn without using his signal and conducted a traffic stop. During the coordinated search operation, officers discovered methamphetamine attached to the undercarriage of Watson's vehicle. Officers then proceeded to search Watson's residence, detaining him in a patrol car parked down the street while the search was underway. Throughout the operation, patrol and probation officers were present and involved. One parole supervisor engaged with Watson, took possession of his phone, and asked for his password. Another accompanied law enforcement and communicated about the planned searches.

During his detention, a police detective, not a parole officer, approached and read Watson his Miranda rights. Watson confirmed he understood his rights and volunteered to cooperate, admitting to having drugs at his grandmother's home. With that information, officers obtained consent from Watson's grandmother to search her garage. When asked, Watson agreed to show the investigators where the narcotics were so the officers could avoid fentanyl exposure. This led to the recovery of fentanyl, methamphetamine, and \$8,600 in cash. Watson was indicted on a charge of possession with intent to distribute fentanyl. He moved to suppress his incriminating statements and all evidence that followed, arguing that the interplay between the compliance search and his parole agreement placed him under compulsion. Because his probation terms required cooperation and truthfulness with his parole officer and probation and parole officers participated in the police operation, Watson stated he felt compelled, under threat of parole revocation, to cooperate and incriminate himself. The district court disagreed and denied Watson's motion, holding that the incriminating statements were made after a valid Miranda warning, which negated the coercive effect of the parole condition.

United States Court of Appeals for the Ninth Circuit

On appeal, Watson claimed he was compelled to cooperate under threat of parole revocation, arguing that this pressure amounted to a "penalty situation" prohibited by the Fifth Amendment. The Ninth Circuit disagreed and affirmed the district court's denial of Watson's motion to suppress, concluding that his statements were not involuntarily compelled under threats of parole revocation. The Ninth Circuit cited *Minnesota v. Murphy*, a United States Supreme Court case. *Murphy* held that when a parolee is required to answer questions truthfully for their supervising officer and is threatened with revocation for silence, it could amount to an unconstitutional penalty unless proper constitutional warnings or immunity are provided. The Ninth Circuit also cited its own decision in *United States v. Saechao*. In *Saechao*, the court found a penalty situation when a parole officer expressly told a probationer he could face revocation for not answering questions and failed to provide Miranda warnings before incriminating evidence was obtained.

Here, Watson made his incriminating statements to a police detective, not his parole officer. Further, these statements came only after he was clearly Mirandized. The court emphasized that Miranda warnings are designed specifically to guard against involuntary self-incrimination in police custody. Thus, the court determined that when a person is adequately Mirandized by police and waives those rights, such statements are not viewed as compelled, even if that person is under other ongoing legal obligations. Watson also argued that the continual presence of parole and probation officers during the compliance search, the use of a compliance check, and the context of his parole status created ambiguity, leading him to believe he had no choice but to cooperate.

In this case, the parole officers participated in the planning and execution of the searches, spoke with Watson during detention, and were present at multiple sites. However, the court found there was a clear division in that the key incriminating statements came during a custodial interrogation by a police detective, not his parole officer. The court also found no evidence that anyone told Watson he would lose his freedom or have his parole revoked if he refused to answer the police's questions. Further, no facts indicated that the parole and probation officers participated in or directed the questioning at issue. Watson also claimed that his parole supervision agreement might lead to confusion about his duties to police, as it required him to be truthful with probation and parole officers and submit to searches by either Idaho Department of Corrections agents or law enforcement. The court relied on the plain language of the supervision agreement, which limited Watson's duty to cooperate and be truthful to his supervising parole officer. The court concluded that if Watson was detained by general law enforcement, his only obligation was to inform them of his parole status and provide his officer's contact information. It was not to answer all police questions or consent to all police requests.

The court also noted that the Fifth Amendment's privilege against self-incrimination typically requires a person to expressly claim the privilege unless the government has created a classic penalty situation where refusing to speak incurs automatic punishment. Here, Watson was not threatened with penalty for silence, was properly Mirandized, and made his admissions to a police detective. Further, there was no direct exercise of coercive parole authority. Thus, the court found there was no unconstitutional penalty, and the presence of parole obligations did not override the validity of proper Miranda warnings. Ultimately, the Ninth Circuit held that Miranda warnings given by police are sufficient to overcome any Fifth Amendment compulsion concerns, even in the context of coordinated compliance searches and cross-agency efforts involving parole officers, absent threats or explicit linking of cooperation to parole status.

Key Takeaways

Watson emphasizes that law enforcement officers can coordinate with probation and parole officers to conduct parole compliance searches when credible information of criminal activity exists. A parolee's cooperation requirement applies only to their supervising officer and not to all law enforcement. As illustrated in this case, statements made by a parolee to police after receiving Miranda warnings are generally admissible. It is crucial that the parolee is not threatened with parole consequences for refusing to cooperate. The presence of a probation or parole officer during law enforcement searches does not automatically make a parolee's statements involuntary. However, probation or parole officers must not be coercive or leverage their authority during police interviews. It is critical for officers to protect the line between supervision activities and criminal investigations.

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