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## ***LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH***

**By Don Hays**

Month of January – 2026 - ALTERNATIVE

# **LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH**

## **Month of January - 2026 - ALTERNATIVE**

### **United States v. Jaison L. Coleman 154 F.4th 558, October 7, 2025.**

**THE CASE:** The police received a 911 call concerning domestic violence. Officers received consent to enter the house in question to check on the children inside. Thereafter, a warrant was obtained and illegal firearms were seized. Did the police receive voluntary consent to enter the house. Once inside, did police exceed the scope of the that consent?

**FACTS:** Just after 4:00 a.m. on April 20, 2023, an Officer responded to a caller reporting that her stepfather threatened to kill her mother and was still inside the home. Upon arriving, the Officer knocked on the door and announced himself. The mother responded by stepping onto the porch and telling the Officer that her son and daughter were inside. She hesitated to answer whether her kids were safe, saying (at that initial moment) only that they were in her bedroom. The Officer then tried again, asking if her kids were going to be okay. The mother again waffled, this time saying that she “hope[d] so.” Taking a different approach, the Officer next asked where her husband was located inside the home. When the mother responded that she did not know, the Officer asked if he could enter. The Mother, who had just turned back to the door, paused before saying, “um ... I’d prefer you not.” A break in the conversation followed, with the mother then telling the Officer that she needed to go inside to get her shoes. After some time passed with no sign of the mother coming back outside, the Officer cracked the door and called into the house several times asking if she was okay. A minute or so later, the mother returned to the doorway and again stepped outside, prompting the Officer to ask anew how things were going inside and, even more specifically, the name of her husband—who the Officer understood had threatened her. The mother responded that it was Jaison Coleman.

A key exchange then followed. When the Officer asked if Coleman was “more calm right now” and, in turn, if the kids were okay, the following dialogue occurred: The Mother: “I ... I ... I don't ... They're ... They're okay right this second ... [unintelligible].” The Officer: “Okay, um, I’m sensing that we almost need to come inside to make sure of that.” The Mother: “Okay.” The Officer: “Okay, um ....” The Mother: “They’re in my bedroom.” The Officer: Are we gonna get bit by dogs if we come in or are they like ....” The mother: You shouldn't, they're just gonna jump all over you.” The Officer: “Okay.” The Mother: “They’re not gonna bite.” The Officer: “Okay. Alright, where do you think [Coleman] is right now?” The Mother: “I’m pretty sure he’s in the back bedroom.” The Officer: “Okay, alright.”

The mother then opened the door for the Officer and his colleagues and facilitated their entry by brushing her dogs away. She led the officers to one of the back bedrooms and pointed out where the kids were. Not seeing Coleman, the Officer asked where he was, and the Mother responded that she did not know. A quick canvas of the home resulted in the Officer finding him in a separate bedroom. A brief discussion followed, with Coleman permitting the Officer to conduct a protective pat down. In talking to the two children, the officers learned that the Mother and Coleman had been fighting, with Coleman reportedly being loud, aggressive, and mean. The children added that their Coleman pointed a gun at their mother and threatened to shoot her and to light the house on fire. In response to questions, the children confirmed they saw the gun, both that night and before, but did not know where it was at that moment.

Based on information gained following their entry into the house, the officers sought and secured a warrant to search the Coleman home. The search turned up several guns, leading in time to a federal indictment charging Coleman with possessing a firearm as a convicted felon. Coleman moved to suppress the recovery of the firearms from his home, contending that his wife never consented to the Officer and his colleagues entering in the first instance. Following a hearing, a magistrate judge issued a report finding that the Mother did consent to the officers entering her home and recommending the denial of Coleman's motion. The district court agreed, adopting the magistrate judge's finding that the Mother consented to the officers' entry and, separately, rejecting Coleman's contention that the officers' activity inside the home exceeded the scope of his wife's consent. Following the district court's denial of his motion to suppress, Coleman chose to plead guilty while reserving his right on appeal to challenge the suppression ruling. This appeal followed.

#### **ISSUE #1: Did the Mother voluntarily consent to the Officers entering her home?**

**ARGUMENT:** On appeal, Coleman, focusing on the Officer’s use of the word “need” in the critical second exchange: “Okay, um, I’m sensing that we almost need to come inside to make sure [the kids are okay],” the Officer argued that the Mother never voluntarily consented to the Officers making a warrantless entry into her home. In fact, Coleman argued that the Officers “coerced” the mother into allowing them to enter her home.

**THE LAW:** The governing legal principles are well-established, with both parties recognizing that consent is an exception to the Fourth Amendment's warrant requirement for searching a home. So too do both sides agree that consent need not come from the defendant: “[a] third party may give consent to search a place in which both she and the defendant have legitimate expectations of privacy, and the defendant can challenge the validity of the consent given by the third party.” The Supreme Court has long recognized that, for consent to be valid, it must be “freely and voluntarily” given. This case law echoes the same standard. Courts assess the voluntariness of consent by considering the totality of the circumstances. Pertinent factors often include, but are not limited to, “(1) the person's age, intelligence, and education; (2) whether he was advised of his constitutional rights; (3) how long he was detained before he gave his consent; (4) whether his consent was immediate, or was prompted by repeated requests by the authorities; (5) whether any physical coercion was used; and (6) whether the individual was in police custody when he gave his consent.”

Even with voluntary consent, the subsequent search must respect “the scope of consent.” The proper inquiry for evaluating the scope of consent is “objective reasonableness,” with courts asking, “what would the typical reasonable person have understood by the exchange between the officer” and the person giving consent?

**FINDINGS:** The Court of Appeals concluded that the Mother voluntarily consented to the Officers entering the home after responding to 911 call of domestic violence. **WHY:** According to the Court, the officer spoke calmly and respectfully to the wife, who responded in ways demonstrating she understood what was transpiring; while the officer did not explicitly tell her that she did not need to consent to his entry, the fact that he asked for permission implied as much, as did the fact that she initially denied his request; at no point was the wife in custody; while the officer did ask twice for permission to enter, their entire conversation lasted but a few minutes; and while the wife may have felt some degree of pressure to let the officers enter her home, at no point did the officer exert coercion.

Specifically, the Court state that having viewed the complete interaction between the Officer and the Mother, it saw no clear error in the district court's finding that she consented to the police officers entering her home. According to the Court, two aspects of the interaction stand out. First, the Officer's tone and demeanor throughout was that of someone concerned, not someone coercing. Second, the Mother showed that she had the ability to deny her consent to entry, as she did just that in response to the Officer's initial request. She chose to let the Officer enter after he asked again, with the second request being unaccompanied by any coercion. The Court held that these observations were clear from the video footage. From the time the Officer arrived at the Coleman residence, he spoke calmly and respectfully to the Mother, who—at all points in time—responded in ways demonstrating she understood what was transpiring. While the Officer did not explicitly tell her that she did not need to consent to his entry, the fact that he asked for permission implied as much, as did the fact that she initially denied his request. At no point was the Mother in custody. And while the Officer did ask twice for permission to enter, their entire conversation lasted but a few minutes. While the Mother may have felt some degree of pressure to let the police enter her home, at no point did the Officer exert coercion. On this record, the Court of Appeals concluded that the district court committed no clear error in finding that the Mother consented to the police entry.

**ISSUE #2:** Did the Officers exceed the scope of the consent they obtained from the Mother when they entered the house to investigate the 911 call?

**FINDINGS:** The Court of Appeals likewise agreed with the district court's finding that the officers acted within the scope of the Mother's consent upon their entry into the home. According to the Court, the Officers’ stated purpose was to check the welfare of her children inside, including by confirming that Coleman presented no danger to them or anyone else. Doing so necessarily required the police to scan the home, locate everyone, and ask some basic questions. The information the police acquired led to their securing a warrant to search the home and recovering three firearms. The Court of Appeals saw no infirmity in the district court's finding that the officers, once inside the Coleman home, respected the consent that the Mother conferred in the first instance. These conclusions eliminated any need on the part of the Court of Appeals to consider the government's alternative contention that the doctrines of exigent circumstances and inevitable discovery also supported the police's entry into and the initial sweep of the Coleman residence.

**CONSLUSION:** The Court of Appeals affirmed the judgment of the District Court and Affirmed Coleman’s weapons conviction.

**NOTE:** The Court of Appeals commented: “(The Officer) and his colleagues exhibited sound and balanced decision making in delicate and difficult circumstances.”

## **QUIZ QUESTIONS FOR THE MONTH OF JANUARY - 2026 - ALTERNATIVE**

### **United States v. Jaison L. Coleman 154 F.4th 558, October 7, 2025.**

1. Consent is a valid exception to the warrant requirement found in the Fourth Amendment.
  - a. True.
  - b. False.
2. The Court in this case listed several factors to be considered when analyzing whether a consent to search was voluntarily given. Which one of the following was not one of those factors?
  - a. the person's age, intelligence, and education;
  - b. whether any physical coercion was used
  - c. the prior criminal history of any person in the house.
  - c. whether the individual was in police custody when he gave his consent.
3. In this case, Coleman argued that his wife was coerced into consenting to the Officers' entry into his home. Did the Court of Appeals agree with this argument?
  - a. Yes.
  - b. No.
4. The Officers questioned the children concerning Coleman's possession of a firearm. The Court of Appeals concluded that these questions exceeded the scope of the consent the Mother gave to the Officers prior to their entry into the house.
  - a. True.
  - b. False.

## **QUIZ QUESTIONS FOR THE MONTH OF JANUARY – 2026 - ALTERNATIVE**

### **United States v. Jaison L. Coleman 154 F.4th 558, October 7, 2025.**

1. Consent is a valid exception to the warrant requirement found in the Fourth Amendment.  
  
**a.     True.**    The governing legal principles are well-established, with both parties recognizing that consent is an exception to the Fourth Amendment's warrant requirement for searching a home. See United States v. Banks, 60 F.4th 386, 390 (7th Cir. 2023); see also Schneckloth v. Bustamonte, 412 U.S. 218, (1973).
  
2. The Court in this case listed several factors to be considered when analyzing whether a consent to search was voluntarily given. Which one of the following was not one of those factors?  
  
**c.     the prior criminal history of any person in the house.**
  
3. In this case, Coleman argued that his wife was coerced into consenting to the Officers' entry into his home. Did the Court of Appeals agree with this argument?  
  
**b.     No.**    The Court concluded that no evidence was introduced that indicated the Mother was coerced into consenting to the search.
  
4. The Officers questioned the children concerning Coleman's possession of a firearm. The Court of Appeals concluded that these questions exceeded the scope of the consent the Mother gave to the Officers prior to their entry into the house.  
  
**b.     False.**    The Court of Appeals concluded that no evidence was introduced to indicate that the Officers exceeded the scope of the consent the Mother gave the Officers.