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1 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2 -----x

3 UNITED STATES OF AMERICA,

4 v.

25 Cr. 176 (MMG)

5 LUIGI MANGIONE,

Conference

6 Defendant.

7 -----x

New York, N.Y.  
January 23, 2026  
11:00 a.m.

9 Before:

10 HON. MARGARET M. GARNETT,

11 District Judge

12 APPEARANCES

13 JAY CLAYTON  
14 United States Attorney for the  
15 Southern District of New York  
16 BY: DOMINIC A. GENTILE  
JUN XIANG  
ALEXANDRA S. MESSITER  
17 THOMAS JOHN WRIGHT  
Assistant United States Attorneys

18 AGNIFILO INTRATER LLP  
19 Attorneys for Defendant  
20 BY: MARC ANTONY AGNIFILO  
KAREN FRIEDMAN AGNIFILO  
JACOB KAPLAN

21 -and-

22 MOSKOWITZ COLSON GINSBERG & SCHULMAN LLP  
BY: EYLAN SCHULMAN  
CHRISTOPHER R. NEFF

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1 THE DEPUTY CLERK: *United States v. Luigi Mangione,*  
2 Case No. 25 Cr. 176.

3 Counsel, please state your appearances for the record,  
4 starting with the government.

5 MR. GENTILE: Good morning, your Honor. Dominic  
6 Gentile, Jun Xiang, Alexandra Messiter, and Thomas John Wright  
7 for the United States. Seated at counsel table with us is  
8 paralegal specialist Ananya Sankar.

9 THE COURT: Good morning.

10 MS. FRIEDMAN AGNIFILO: Good morning. Karen Friedman  
11 Agnifilo on behalf of Mr. Mangione. Also, Marc Agnifilo, Jacob  
12 Kaplan, Eylan Schulman, and Christopher Neff on behalf of  
13 Mr. Mangione. Bella Irwin will be seated at counsel table  
14 doing exhibits during cross-examination.

15 Thank you, your Honor.

16 THE COURT: Thank you all. You can be seated.

17 A couple of reminders for everyone. The first is for  
18 counsel, that, as I told you a couple of weeks ago when we were  
19 last together, that we have a live audio feed to the overflow  
20 room. The microphones are very sensitive, much more sensitive  
21 than they are here in the courtroom, so if you need to confer  
22 privately with each other or if you need to confer with  
23 Mr. Mangione privately, just be very conscious of the  
24 microphones. You can mute your microphone if you're going to  
25 speak and you'd like it to be private.

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1           Also, if you are one of the handful of people who are  
2 allowed to have a cell phone with you, just take a moment and  
3 make sure that it is fully silent in all respects. Off is  
4 better. If anyone's phone goes off during the proceeding, it  
5 will be taken and you may be escorted out.

6           First, a couple of administrative notes before we get  
7 to the evidence today. As to trial scheduling, I'm going to  
8 adopt the parties' suggestion that we begin in-person jury  
9 selection on Tuesday, September 8, with the goal of beginning a  
10 non-capital on Tuesday, October 13. The Monday the 12th the  
11 parties suggested is a court holiday. So that would begin on  
12 Tuesday, October 13. If a capital trial is to happen, that  
13 would begin -- we'd begin the presentation of evidence, opening  
14 statements really, on Monday, January 11, 2027.

15           One thing that was absent from the parties' proposal  
16 but is crucial to the Court's timing, in particular the timing  
17 of the jury department's work, is any discussion of a jury  
18 questionnaire, and, if one is used, how the administration of  
19 that questionnaire would intersect with the timing of jury  
20 selection. Since we're together again next Friday to talk  
21 about scheduling and other matters, I just ask counsel to  
22 consider that issue, discuss it with each other, and then we  
23 can take it up on next Friday when we're together.

24           Okay. I also received the government's search warrant  
25 affidavit. Thank you Mr. Gentile.

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1 Does that entire document need to be under seal? In  
2 other words, if I refer to that document in my suppression  
3 opinion, is there any information that I need to be aware of  
4 that may need to be sealed?

5 MR. GENTILE: No, your Honor.

6 THE COURT: All right. Good. I just want to make  
7 sure.

8 Then, finally, just a word about today's hearing and  
9 the government's letter. As I previously stated, both orally  
10 and in writing, the sole issue for today's hearing is to  
11 receive evidence about the standard procedures being used by  
12 the Altoona Police Department in September of 2024 relating to  
13 the securing, safeguarding, and, if appropriate, inventorying  
14 of the personal property of a person arrested in a public  
15 place, all to inform the Court's evaluation of the government's  
16 inevitable discovery arguments related to the contents of the  
17 defendant's backpack.

18 The reason for the limitation, as I explained a little  
19 bit the last time we were together, is that, in the Court's  
20 view, the relevant facts that are necessary to deciding the  
21 rest of the suppression motion and the government's arguments  
22 and opposition to it are not in dispute.

23 Mr. Kaplan, are you going to be handling the  
24 cross-examination?

25 MR. KAPLAN: No, your Honor. Mr. Agnifilo will.

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1 MR. AGNIFILO: It's going to be me, your Honor.

2 THE COURT: All right. Of course, Mr. Agnifilo, I  
3 will give you some latitude on cross-examination to impeach,  
4 but only if it is impeachment of this witness and his direct  
5 testimony. I'm not going to allow this to turn into some kind  
6 of extension of the state hearing by proxy. I'm confident that  
7 you understand that, but it's good to make sure we're all on  
8 the same page.

9 MR. AGNIFILO: Thank you, Judge.

10 THE COURT: So, with that understanding, as I said, in  
11 its letter this morning, the government has asked me to  
12 preemptively prevent the defense from using Defense Exhibit  
13 Two, which appears on its face to be some kind of police log  
14 document related to Mr. Mangione's arrest. I'm not going to do  
15 that at this point, because I don't know yet the questions that  
16 Mr. Agnifilo might ask about that document and the relevance of  
17 those questions, and I can't really assess that in a vacuum.

18 I certainly understand the government's concerns. I'm  
19 also confident that Mr. Agnifilo understands the scope of this  
20 hearing. Everyone should understand that if we begin to veer  
21 beyond that scope on direct or cross, I won't hesitate to put a  
22 stop to it in the interest of conserving the Court's time and  
23 not having this turn into a circus that is not relevant to any  
24 issue before the Court.

25 So, with that, before we call the witness, anything,

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1 Mr. Gentile, that you'd like to raise?

2 MR. GENTILE: Not from the government, Judge. No.

3 THE COURT: Mr. Agnifilo, anything?

4 MR. AGNIFILO: Nothing from us, Judge. No.

5 THE COURT: All right. Mr. Gentile, does the  
6 government have a witness?

7 MR. GENTILE: We do, your Honor. The government calls  
8 Deputy Chief Nathan Snyder.

9 THE COURT: Great.

10 Mr. Snyder.

11 Okay. We're getting him from the hall I assume.

12 Welcome, Mr. Snyder. You're going to come right over  
13 here, and when you get to the witness box, just remain standing  
14 for the oath.

15 Thank you.

16 (Witness sworn)

17 THE DEPUTY CLERK: Please state and spell your full  
18 name for the record.

19 THE WITNESS: Nathan Snyder, N-a-t-h-a-n, S-n-y-d-e-r.

20 THE DEPUTY CLERK: Thank you. You may be seated.

21 THE COURT: You might want to lower that chair. It  
22 looks a little high. But you do whatever is comfortable for  
23 you.

24 Mr. Gentile.

25 MR. GENTILE: May I inquire, Judge?

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1 THE COURT: You may.

2 MR. GENTILE: Judge, before we begin, I just wanted to  
3 point out that some of the exhibits that the government intends  
4 to introduce today are duplicates of exhibits that were  
5 attached to our motion papers. We are re-numbering them for  
6 purposes of this hearing, though.

7 THE COURT: Okay.

8 NATHAN SNYDER,

9 called as a witness by the government,

10 having been duly sworn, testified as follows:

11 DIRECT EXAMINATION

12 BY MR. GENTILE:

13 Q. Good morning, sir.

14 A. Good morning.

15 Q. By whom are you employed?

16 A. The Altoona Police Department.

17 Q. And what is your current position within the Altoona Police  
18 Department?

19 A. I am the deputy chief.

20 Q. And how long have you been with the Altoona Police  
21 Department?

22 A. Since June of 2009.

23 Q. Did you hold any law enforcement positions prior to your  
24 employment with the Altoona Police Department?

25 A. I worked in the state correctional institution for about

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1 four years.

2 Q. Can you briefly describe the positions you've held while  
3 you've been with the Altoona Police?

4 A. Sure. When I was hired in 2009, I was a probationary  
5 officer until about 2013. I was promoted to corporal. And  
6 then about five years after that, I was promoted to sergeant;  
7 and about three or four years after that, to lieutenant; and  
8 then, most recently, as the deputy chief as of January 2nd.

9 Q. Congratulations on your promotion.

10 A. Thank you.

11 THE COURT: That's January 2nd of this year?

12 A. This year. That's right.

13 Q. Did any of the positions that you just described involve  
14 the training of police officers?

15 A. Yes, they did. When I was a patrolman before I became a  
16 corporal, I was designated as a FTO. That's a field training  
17 officer. And then once I was promoted to corporal, I actually  
18 oversaw our FTO program for a couple years. And then, again,  
19 as a lieutenant, I oversaw the program for a couple years then,  
20 too.

21 Q. Just briefly, what is a field training officer?

22 A. So, a field training officer is responsible for training  
23 probationary officers to become Altoona Police Officers and be  
24 out on solo patrol.

25 Q. And does that include training them on rules and procedures

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1 of the police department?

2 A. Yes, it does.

3 Q. For how long were you involved in the training of police  
4 officers in Altoona?

5 A. Since about 2012.

6 Q. And approximately how long did you serve as a field  
7 training officer specifically?

8 A. So, once you're designated a field training officer, you're  
9 always involved in the training and mentorship of probationary  
10 officers.

11 Q. Chief, does the Altoona Police Department maintain a  
12 written set of written policies and procedures?

13 A. Yes, they do.

14 Q. And what is that collection of policies and procedures  
15 called?

16 A. They're referred to as general orders.

17 Q. And are those general orders compiled in a larger manual of  
18 some sort?

19 A. Yes, they are.

20 Q. And is that manual accessible to the officers of the  
21 Altoona Police Department?

22 A. Yes, it is, both electronically and in a hard copy, paper  
23 copy.

24 Q. So each of the officers has a manual; is that right?

25 A. That is correct.

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1 Q. Approximately how many sworn officers are there in Altoona  
2 Police?

3 A. Currently, there are 70.

4 Q. And how are these officers instructed on the rules and  
5 procedures of the Altoona Police Department?

6 A. So, initially, when they are brought in, the FTO will read  
7 over the general orders with them, explain them to them. They  
8 will then take them out on the street and demonstrate how to  
9 apply them, and then, at a later time, they're quizzed  
10 basically by a supervisor as to their knowledge of that general  
11 order.

12 THE COURT: I'm sorry, Mr. Gentile, to interrupt you.  
13 Can I just ask, does Altoona have its own police  
14 academy, Mr. Snyder -- or Chief Snyder, or do you participate  
15 in some kind of pool academy?

16 THE WITNESS: We do not have our own specific. We  
17 actually participate in a larger pool, which is governed by  
18 MPOETC.

19 THE COURT: What is MPOETC?

20 THE WITNESS: MPOETC is the Municipal Police Officers  
21 Education and Training Commission. They're the governing body  
22 for Municipal Police in Pennsylvania.

23 THE COURT: Okay. So, the multiple departments pool  
24 to have an academy, and this training that you've talked about,  
25 the FTO portion, that's happening after officers come to you

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1 from this pool academy?

2 THE WITNESS: Yes, Judge. That's correct.

3 THE COURT: Thank you. Go ahead, Mr. Gentile.

4 MR. GENTILE: Thank you, Judge.

5 Q. Just following up on what the Court's questions were, the  
6 rules and procedures of the Altoona Police Department, are they  
7 taught by the police academy that the officers attend, or just  
8 by these field training officers and the department itself?

9 A. By the field training officers and the department itself.

10 Q. In addition to the general orders, are there any written  
11 materials that the department uses to implement its policies  
12 and procedures and to train the officers on?

13 A. Yes, there is. We call them task sheets.

14 Q. And what are the training task sheets?

15 A. Training task sheets are basically the building block for a  
16 specific task that the probation officer needs to learn,  
17 anything from searches or how to tow a vehicle, and how we do  
18 those things.

19 Q. Do the task sheets correspond to the general orders you  
20 described earlier?

21 A. Yes, they do.

22 Q. And are the task sheets part of the manual?

23 A. Yes.

24 Q. We're going to get into those task sheets a little bit more  
25 later. Before we move on, Chief, I want to ask you, were you

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1 involved in the arrest of the defendant on December 9, 2024, in  
2 Altoona, Pennsylvania?

3 A. No, I was not.

4 Q. Were you even working that day?

5 A. I was, but not in that area.

6 Q. Were you in Altoona, Pennsylvania, on that day?

7 A. No, I was not.

8 Q. Have you spoken with the officers who did participate in  
9 his arrest at the McDonald's in any substantive way about their  
10 actions that day?

11 A. No, I have not.

12 Q. And have you had any involvement in the Altoona Police  
13 Department's investigation of the defendant?

14 A. No, I have not.

15 Q. Have you reviewed any of the body-worn camera worn by the  
16 officers who interacted with the defendant on December 9, 2024?

17 A. No, I have not.

18 Q. Let's talk a little bit about specific policies and  
19 procedures of the Altoona Police Department, specifically,  
20 those regarding the securing, safeguarding and inventorying of  
21 detainee property.

22 Does the Altoona Police Department manual have  
23 specific procedures which pertain to detainee property?

24 A. Yes, we do.

25 Q. And what are those policies and procedures?

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1 A. They are found in general orders 3.1, 3.5 and 3.6.

2 Q. And are there any policies and procedures that are  
3 discussed or referenced in those task sheets that you discussed  
4 earlier?

5 A. Yes, there are.

6 Q. Let's start with general order 3.1.

7 With the Court's permission, I'm going to ask  
8 Ms. Sankar to publish what's been marked as Government Exhibit  
9 One to the Court, the witness and the parties.

10 THE COURT: Yes.

11 Any objection, Mr. Agnifilo?

12 MR. AGNIFILO: No, your Honor. None.

13 Q. Chief, do you recognize this document that's on the screen  
14 in front of you?

15 A. Yes, I do.

16 Q. What is it?

17 A. This is the Altoona Police Department's general order 3.1.

18 Q. Is this a true and accurate copy of general order 3.1?

19 A. Yes, it is.

20 MR. GENTILE: The government offers Government Exhibit  
21 One into evidence, Judge.

22 THE COURT: Any objections, Mr. Agnifilo?

23 MR. AGNIFILO: No objection, your Honor. Thank you.

24 THE COURT: All right. Government Exhibit One is  
25 received.

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1 (Government Exhibit One received in evidence)

2 Q. Chief, what is the title of general order 3.1?

3 A. Cell area.

4 Q. And which sections of general order 3.1 apply to detainee  
5 property?

6 A. 3.1.9 and 3.1.10.

7 Q. I'm going to direct your attention to section 3.1.9, which  
8 is titled "Required Detainee Searches," and specifically  
9 subsection A, which is titled "Inventory Search of the  
10 Detainee." And that's on page six, and paragraph one under  
11 that subheading.

12 I'm going to ask you to take a look at that, and then  
13 I'm also going to direct your attention to section 3.1.10,  
14 which is titled "Secure Storage of Detainee Property," and it's  
15 specifically subsection A and sub-subsection (a)(1). Just look  
16 at that briefly.

17 Chief, taken together --

18 THE COURT: I'm sorry, Mr. Gentile.

19 Mr. Snyder, if at any time it's helpful to you to see  
20 a paper copy of these documents, so you can see these things in  
21 context -- I know you're very familiar with the things the  
22 government is showing you, but if at any time you -- the screen  
23 is fantastic, but you can't always see the whole document, so  
24 please don't hesitate. I have paper copies. So does the  
25 government. If at any time it would be helpful for you to see

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1 something in context in paper, you just tell me and we'll take  
2 care of it. Okay?

3 THE WITNESS: Okay. Thank you.

4 THE COURT: Go ahead, Mr. Gentile.

5 MR. GENTILE: Thank you, Judge.

6 Q. Taken together, Chief, what do these two sections of the  
7 general order 3.1 describe?

8 A. They describe the process of when a detainee is brought to  
9 station, that their property will be searched, that the  
10 detainee will be searched, that the property will be  
11 inventoried, and it will be safeguarded until a disposition of  
12 the detainee.

13 Q. Does this system of securing and inventorying detainee  
14 property described in these particular sections apply only to  
15 property that is found on a detainee's person, or does it apply  
16 to all property belonging to a detainee?

17 A. This would be for all property.

18 Q. And do these procedures apply to the personal property of a  
19 person arrested in a public place?

20 A. Yes.

21 Q. Let's turn to general order 3.6.

22 MR. GENTILE: May we publish what has been marked as  
23 Government Exhibit Two, Judge?

24 THE COURT: Any objection, Mr. Agnifilo?

25 MR. AGNIFILO: No objection, Judge.

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1 THE COURT: Yes.

2 Q. Chief, do you recognize this document?

3 A. Yes, I do.

4 Q. And can you tell the Court what it is?

5 A. It is the Altoona Police Department's general order 3.6.

6 Q. And is it a true and accurate copy of general order 3.6?

7 A. Yes, it is.

8 MR. GENTILE: The government offers Government Exhibit  
9 Two into evidence, Judge.

10 MR. AGNIFILO: No objection.

11 THE COURT: Okay. Government Exhibit Two is received.

12 (Government Exhibit Two received in evidence)

13 Q. Chief, what is the title of general order 3.6?

14 A. "Property and Evidence Control."

15 Q. I'm going to direct your attention to section 3.6.1 on page  
16 2, which contains the heading "Receiving and Retention of  
17 Evidence and Property." I'm going to ask you to look at that  
18 briefly.

19 Generally speaking, Chief, what procedure does 3.6.1  
20 establish for property coming into the possession of the  
21 Altoona Police Department?

22 A. It states that all property that we receive must be  
23 documented, inventoried and safeguarded until a disposition can  
24 be made.

25 Q. And it applies to those enumerated categories below

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1 paragraph one; is that right?

2 A. That is correct.

3 Q. And does this system of safeguarding, securing and  
4 inventorying property apply to all of a detainee's property or  
5 only property that's found on his or her person?

6 A. All of their property.

7 THE COURT: Can I just ask you, Mr. Snyder, this  
8 category B, all the other properties -- all the other  
9 categories seem pretty self-explanatory to me, but category B,  
10 "recovered property," based on your experience and involvement  
11 with implementing these orders, what does "recovered property"  
12 mean?

13 Give me some examples of what that refers to.

14 THE WITNESS: So recovered property would be anything  
15 that we find that we can't relatively quickly link to an owner,  
16 that our guys find, where -- versus like a found property,  
17 typically we're talking about somebody brings that to the  
18 station or somebody stops an officer and says, hey, I found a  
19 wallet, that type of thing.

20 THE COURT: All right. So "recovered property" is  
21 intended to encompass things that police officers might find,  
22 whether at a crime scene or in connection with some other  
23 investigation? Basically, anything that isn't found or  
24 abandoned but is picked up by a police officer in some context  
25 in the course of their duties?

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1 THE WITNESS: I would say that's accurate.

2 THE COURT: Thank you.

3 Go ahead Mr. Gentile.

4 MR. GENTILE: Thank you, Judge.

5 Q. Following up on the Court's question, all of those  
6 enumerated categories, this procedure applies to? This  
7 procedure applies to all those enumerated categories; is that  
8 right?

9 A. That is correct.

10 Q. So, that means that any recovered property that's not  
11 associated with anyone would also be inventoried as well; is  
12 that right?

13 A. That is correct.

14 Q. Does this section include the personal property of a person  
15 arrested in a public place?

16 A. Yes, it does.

17 Q. The third general order you mentioned, Chief, is general  
18 order 3.5; is that right?

19 A. That's correct.

20 MR. GENTILE: May we publish what has been marked as  
21 Government Exhibit Three?

22 MR. AGNIFILO: No objection.

23 THE COURT: Yes.

24 Q. Chief, do you recognize this document?

25 A. Yes, I do.

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1 Q. And what is this document?

2 A. This is the Altoona Police Department's general order 3.5.

3 Q. And is this a true and accurate copy of general order 3.5?

4 A. Yes, it is.

5 MR. GENTILE: The government offers Government Exhibit  
6 Three into evidence.

7 MR. AGNIFILO: No objection, Judge.

8 THE COURT: Government Exhibit Three is received.

9 (Government Exhibit Three received in evidence)

10 Q. Chief, can you read what the title of general order 3.5 is?

11 A. "Collection and Preservation of Evidence."

12 Q. Directing your attention to section 3.5.2, on page 2.

13 What does that section of 3.5 cover?

14 A. Again, it states, all evidence and property received by a  
15 member of our department will be documented, safeguarded and  
16 secured until a disposition can be made with that.

17 Q. And, again, it applies to those enumerated categories  
18 underneath paragraph A; is that right?

19 A. That is correct.

20 Q. Generally speaking, what does section 3.5.2 instruct  
21 officers to do with those categories of property?

22 A. It says that we're going to document them, inventory and  
23 secure them until we can get a disposition for that property.

24 Q. Chief, the three general orders we just went through, were  
25 they all in effect in December of 2024?

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1 A. Yes, they were.

2 Q. Let's talk a little bit more about the task sheets you  
3 discussed earlier. How are the Altoona Police Department  
4 officers instructed on the procedures described in the general  
5 orders?

6 A. So, again, with the task sheets, they're read to the  
7 probationary officer, usually by the FTO. The FTO can ask  
8 questions -- or, I'm sorry, the probationary officer will ask  
9 questions. The FTO will clarify that, and then they'll  
10 actually attempt to demonstrate that to show them in the field  
11 how that applies. Again, they'll be brought back to the  
12 station at some point and quizzed by a supervisor as to their  
13 knowledge of that task, and then they'll be signed off on it.

14 Q. I believe you testified earlier that the task sheets  
15 correspond to the general orders in the manual; is that right?

16 A. That is correct.

17 Q. Do instructions in the task sheets -- I'm sorry. Since the  
18 instructions on the task sheets correspond to the general  
19 orders, does that mean that the instructions on those sheets  
20 are followed by the Altoona Police Officers throughout their  
21 careers?

22 A. That is correct.

23 Q. So it's not -- doesn't just apply to probationary officers;  
24 is that right?

25 A. That is correct.

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1 THE COURT: So let me just make sure I understand,  
2 Mr. Snyder. The purpose of what we are calling "task sheets,"  
3 their purpose to exist is to assist in training new officers;  
4 is that right?

5 THE WITNESS: That is correct.

6 THE COURT: But the concepts and instructions and  
7 procedures that are reflected on those task sheets are  
8 procedures that apply to any officer in the department, not  
9 only probationary officers?

10 THE WITNESS: That is correct.

11 THE COURT: Okay. Sometimes I just -- I want to make  
12 sure I understand, so if I say something that's wrong, I want  
13 you to correct me. But the summary that I -- do I have a  
14 correct understanding of these task sheets?

15 THE WITNESS: That is correct.

16 THE COURT: Great. Thank you.

17 Go ahead, Mr. Gentile.

18 MR. GENTILE: Thank you, Judge.

19 With the Court's permission, I'm going to ask  
20 Ms. Sankar to publish for the Court, the witness and the  
21 parties Government Exhibit Four.

22 MR. AGNIFILO: No objection.

23 THE COURT: You may publish Government Exhibit Four.

24 Q. Chief, do you recognize this document?

25 A. Yes, I do.

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1 Q. And can you tell the Court what it is?

2 A. This is the Altoona Police Department task sheet for  
3 custodial arrest procedures, summary, misdemeanor and felony  
4 offenses.

5 Q. And is this a true and accurate copy of the task sheet for  
6 custodial arrest procedures?

7 A. Yes, it is.

8 MR. GENTILE: The government offers Government Exhibit  
9 Four into evidence.

10 MR. AGNIFILO: No objection, Judge.

11 THE COURT: All right. Four is received.

12 (Government Exhibit Four received in evidence)

13 Q. I'm going to direct your attention to II. It's on page 3,  
14 operational procedures, section D, which is titled "In-custody  
15 Arrests," and I'm going to ask you to focus on no. 7.

16 What procedure does this specific subsection address?

17 A. This talks about prisoners and their property being  
18 inventoried, and actually entering that information on an  
19 Altoona Police Department prisoner log.

20 Q. And does this inventory procedure apply to all property  
21 that accompanies a person arrested by an Altoona officer --

22 A. Yes.

23 Q. -- or just property found on his person?

24 A. All property.

25 Q. Chief, the last item I want you to take a look at is what

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1 has been marked as Government Exhibit Five.

2 MR. GENTILE: May we publish, Judge?

3 THE COURT: Yes.

4 Q. Chief, do you recognize this document?

5 A. Yes, I do.

6 Q. And what is this?

7 A. It is the Altoona Police Department "detention of  
8 prisoners, adult" task sheet.

9 Q. Is this a true and accurate copy of the task sheet  
10 "detention of prisoners?"

11 A. Yes, it is.

12 MR. GENTILE: The government offers Government Exhibit  
13 Five into evidence.

14 MR. AGNIFILO: No, objection, Judge.

15 THE COURT: Five is received.

16 (Government Exhibit Five received in evidence)

17 Q. Chief, I'm going to direct your attention to II,  
18 operational procedures, letter D.

19 Generally speaking, Chief, what procedure does this  
20 specific section address?

21 A. This is addressing personal belongings that are found with  
22 a prisoner being inventoried and, again, safeguarded until a  
23 disposition can be made for them.

24 Q. Does this inventory procedure apply to an arrestee's  
25 property that are going to be returned to the prisoner?

Q1NDManC

Nathan Snyder - Direct

1 A. Yes.

2 Q. Does this specific procedure come into play after a search  
3 of an arrestee is conducted and they've already identified what  
4 property is personal and what property is evidence?

5 A. Yes, that would be correct.

6 Q. So how does this specific inventory procedure fit within  
7 the broader set of procedures we've discussed previously?

8 A. So, when we're inventorying property, we decide what's  
9 going to be evidence, and that gets taken care of, documented,  
10 and then placed into secure evidence. Personal belongings that  
11 are items that the detainee could get back, or that could  
12 follow him to an institution, those things are also documented,  
13 but they're documented on this form. And then they are placed  
14 into a secure locker that can be accessed once we have a  
15 disposition of the prisoner. So, that's how it works.

16 Q. Is this simply an additional layer of the inventory  
17 process?

18 A. Yes, it is.

19 Q. Chief, were the two task sheets that you just described for  
20 us in effect in December of 2024?

21 A. Yes, they were.

22 Q. My last question, Chief: Are the procedures you've  
23 described here today the standardized procedures for the  
24 Altoona Police Department when conducting inventory searches?

25 A. Yes.

Q1NDManC

Nathan Snyder - Direct

1 MR. GENTILE: No further questions, Judge.

2 THE COURT: Thank you, Mr. Gentile.

3 I just have one further question before  
4 cross-examination. Other than for items which are evidence,  
5 which I understand the purpose, but from your perspective and  
6 based on your training and experience, what's the purpose of  
7 this safeguarding and inventorying procedure for the remainder  
8 of a detainee's personal property?

9 THE WITNESS: So, in my experience, I've had people  
10 with heirloom necklaces from their grandmother, things like  
11 that. These are all their personal property, and we want to  
12 make sure that we get them back to this detainee. We're  
13 responsible for taking them into custody, and that kind of goes  
14 along with we're now responsible for your property, we want to  
15 make sure you get it back.

16 Furthermore, I don't want to give back somebody's  
17 property without inventorying, because somebody could say, hey,  
18 my wallet had \$10,000 in it, and I don't know that if I don't  
19 search it. And, obviously, one of the most important is also  
20 that I'm not going to store any type of weapon or anything that  
21 can maybe be accessed even upon release or anything like that,  
22 so I want to make sure it's safe with the property.

23 THE COURT: Just taking a step back to arrest  
24 procedures, let's say I'm arrested on a public bus and I have  
25 my purse or backpack like on the seat next to me and the

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Nathan Snyder - Direct

1 officers come, ma'am, stand up, and in that standing up and  
2 handcuffing of me, I'm separated from my purse, with my wallet  
3 and cell phone and all that. What is the property procedure to  
4 be followed in Altoona? If you were training an officer, what  
5 are they supposed to do with that purse that's on the seat on a  
6 public bus?

7 THE WITNESS: So they'll start by asking, ma'am, is  
8 this your purse? And if you say yes, we'll take that property  
9 with you. If you say, no, it's not my purse, in a public place  
10 like that, we'll go ask whoever owns the -- or who's  
11 responsible for that area, hey, does this purse belong here, is  
12 it yours? If no, then we will take custody of that purse,  
13 because it is somebody's purse. And then we will inventory it  
14 and try to get it back to its owner.

15 THE COURT: Why not just leave it there? You've  
16 arrested me and you're taking me away. Why not just leave the  
17 bag?

18 THE WITNESS: Our duties are sometimes a little broad.  
19 Even though we're trying to accomplish one thing, we may  
20 encounter something else, and we can't turn a blind eye to it.  
21 We still have to handle that while we're there, also.

22 THE COURT: What if I say, yes, it is my bag? Why not  
23 leave it there? I'm being arrested.

24 THE WITNESS: Well, because you want to bring it with  
25 you. You probably have valuables in there like your ID. You

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Nathan Snyder - Cross

1 might need money to take a bus home or anything like that.  
2 More importantly, nowadays, everybody has their phone  
3 somewhere. I know I wouldn't want to be separated from those  
4 items.

5 THE COURT: Thank you.

6 Mr. Agnifilo.

7 MR. AGNIFILO: Yes. Thank you very much.

8 CROSS-EXAMINATION

9 BY MR. AGNIFILO:

10 Q. Chief Snyder, it's very nice to meet you. My name is Marc  
11 Agnifilo. I'm going to ask you a few questions. It won't be  
12 very long. We'll get you back to Altoona before ice and snow  
13 reclaim the earth.

14 A. Thank you.

15 Q. So one thing I want to go over with you, the differences  
16 between these general orders you talked about with my  
17 colleague, and what were the other things called, task sheets?

18 A. That's correct.

19 Q. Okay. And just what -- who writes the task sheets, if you  
20 know?

21 A. So, before me, I believe the training coordinator, prior to  
22 me, had written out these task sheets.

23 Q. Okay. And the general orders, the order is from the police  
24 chief of the Altoona Police Department; am I right?

25 A. That would be correct.

Q1NDManC

Nathan Snyder - Cross

1 Q. Okay. And do you have any hard copies of the orders in  
2 front of you or no?

3 A. I do not.

4 Q. If you -- I repeat what the judge said, if you want the  
5 hard copy orders, I'll give them to you, and that's fine.

6 THE COURT: Mr. Agnifilo, do you want him to have  
7 them? I see Mr. Gentile is --

8 MR. AGNIFILO: If we could get them easily, that would  
9 be great. We have them, too. I think we have them, too.

10 THE COURT: Okay. If it would be easier just to have  
11 them --

12 MR. AGNIFILO: It might be.

13 THE COURT: -- for Chief Snyder to have them in front  
14 of him --

15 MR. AGNIFILO: We can use one as an example. This is  
16 Government Exhibit One. Can I approach the --

17 THE COURT: Yes, of course.

18 Q. If we're able to -- it's already in evidence. This is  
19 Government Exhibit One. If we can go to the last page of this  
20 and put this up on the screen for everyone.

21 All right. If we can go to the last page?

22 So, when you get yourself situated, Chief, this is the  
23 last page of Government Exhibit One, and what you see here,  
24 this one is not signed, but you see a place where it would be  
25 signed by -- is that a police chief whose name you're familiar

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Nathan Snyder - Cross

1 with?

2 A. Yes, it is.

3 Q. Okay. And this name, it's Janice Freehling? Am I saying  
4 that right?

5 A. Yes, that's correct.

6 Q. Okay. And Chief Freehling was the chief of the Altoona  
7 Police Department at some point in the past; am I right?

8 A. That is correct.

9 Q. Okay. She's no longer the chief?

10 A. No longer.

11 Q. All right. And is it your understanding with these general  
12 orders that these are actually signed by the chief of police?

13 A. Yes.

14 Q. This one doesn't happen to be, but there's a place for a  
15 signature?

16 A. That is correct.

17 Q. Okay. And, in your experience, if we were in the Altoona  
18 Police Department and we were looking at the general orders,  
19 would we see these general orders signed by the police chief?

20 A. That is correct.

21 Q. All right. And that's true for all the general orders; am  
22 I right?

23 A. I would say that would be correct.

24 Q. Okay. Just to give an example, let's just pull up, just as  
25 another example, Government's Exhibit Two. It's already in

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Nathan Snyder - Cross

1 evidence. We'll go to the last page. We can give you that  
2 hard copy as well.

3 MR. AGNIFILO: May I approach the witness, Judge?

4 THE COURT: Yes.

5 MR. AGNIFILO: Thank you.

6 Q. All right. This is Government's Exhibit Two. We're going  
7 to go to the last page.

8 And we see this same sort of signature block there,  
9 right?

10 A. That is correct.

11 Q. Okay. And now, in regard to these task sheets, let's go to  
12 what is already in evidence, for example, as Government's  
13 Exhibit Five, if we can pull it up for the chief. It's a  
14 two-page document.

15 Chief, we're going to show you both pages. So, this  
16 is the first page of Government's Exhibit Five.

17 Do you see that there on your screen?

18 A. I do.

19 Q. Okay. And let's go to the second page.

20 Do you see that on your screen?

21 A. Yes, sir.

22 Q. All right. So one of the differences -- and tell me if  
23 this is right -- between the general orders and these task  
24 sheets is that the general orders are actually signed by the  
25 chief of police, correct?

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Nathan Snyder - Cross

1 A. That is correct.

2 Q. All right. And tell us again, who prepares the material in  
3 the task sheets?

4 A. Before me, I believe it was the training coordinator.

5 Q. All right. So am I right that one has the sort of force of  
6 an order -- it's called an order, signed by the police chief --  
7 and then one does not? Am I right?

8 A. So the task sheet is meant to be broken down, because,  
9 again, it's the first exposure that a probationary officer has  
10 to this task, so it's really broken down. Whereas, when you  
11 saw in the general orders that were mentioned and that we  
12 talked about, there was maybe only four or five lines on these  
13 talking about maybe in the same task, you're now broken down  
14 into two pages of explanation, because, again, we're not  
15 dealing with a 10-year veteran who may understand the lingo and  
16 that type of thing. This is a brand new guy fresh out of the  
17 academy. So --

18 Q. Got it. Let's go to the first page of this document. If  
19 you can -- so the point -- this is really a summary. This is a  
20 summary of corresponding parts of the general order; is that a  
21 fair way to put it?

22 A. I would say if you look at the training task sheet itself,  
23 like Roman numeral I there has reference material, so that's  
24 also explaining to the probation officer, we're not just  
25 telling you what to do. We're going to show you where that

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Nathan Snyder - Cross

1 came from, also, because that is part of the task sheet for the  
2 actual probationary officer, an FTO, to go over that reference  
3 material, to show them how we got to this is why we do that.

4 Q. Got it. All right. I'm going to direct your attention to  
5 Government's Exhibit One. I think you have a hard copy. You  
6 went over it with my colleague from the government.

7 I want to direct your attention to 3.1.9, which is on  
8 the sixth page, and when you get there, just look up and let me  
9 know you're there.

10 A. Yes.

11 Q. All right. So this is entitled "required detainee  
12 searches," right?

13 A. That is correct.

14 Q. Okay. So you agree with me, we're going to go step-by-step  
15 through this section. In terms of the title, there's no  
16 reference to a bag, there's no reference to a car, there's no  
17 reference to anything other than the three words, "required  
18 detainee searches;" am I right?

19 A. That is correct.

20 Q. And then, A, it says, "inventory search of the detainee."  
21 Do you see that?

22 A. I do.

23 Q. Okay. Again, no reference to anything other than the  
24 detainee, the person in custody, correct?

25 A. Correct.

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Nathan Snyder - Cross

1 Q. And let's look at the first sentence. "All detainees  
2 placed in the cell block area shall be thoroughly searched by  
3 the processing officer regardless of any prior searches that  
4 occurred in the field." That's the first sentence there,  
5 right?

6 A. That's correct.

7 Q. All right. So, this is talking about a search of, by its  
8 own words, the detainee in the cell block area, correct?

9 A. That is correct.

10 Q. All right. So this is telling us that the search of the  
11 detainee has to be in a particular area, specifically, the cell  
12 block area, correct?

13 A. It's saying, in that first sentence, that the detainee  
14 placed in the cell block shall be searched thoroughly by the  
15 officer. That's prior to putting them in that cell block.

16 Q. Correct. Okay. So what this is telling us is that the  
17 detainee is supposed to be searched prior to the detainee being  
18 put in the cell?

19 A. That is correct.

20 Q. All right. If we go to the second paragraph, it says,  
21 whenever possible, a search of the detainee, shall be conducted  
22 by an officer or other member of the same -- of the same sex as  
23 the detainee; am I right?

24 A. That is correct.

25 Q. And that's because this contemplates a physical search of

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Nathan Snyder - Cross

1 the person of the detainee; am I right?

2 A. Yes, that's correct.

3 Q. All right. If we were talking about a search of a bag or a  
4 backpack, the sex of the person searching the bag or the  
5 backpack wouldn't matter, would it?

6 A. Not that I'm aware of.

7 Q. Right. This is somewhat of a privacy concern that we want  
8 male detainees searched by male officers; we want female  
9 detainees searched by female officers; am I right?

10 A. You would be correct.

11 Q. Okay. And that same concern would not exist if the search  
12 was of a shoulder bag or a backpack or some other object; am I  
13 right?

14 A. Not that I would find any reason for.

15 Q. Right. Okay. And then it goes on to say, the search  
16 should be conducted in a safe and discrete manner. Along the  
17 same lines, we want the search of the person to be conducted in  
18 a safe and discrete manner. Am I correct?

19 A. Correct.

20 Q. Okay. Because what we're talking about in these two  
21 paragraphs is the search of a person; am I right?

22 A. I would say that would be correct.

23 Q. Okay. So let's go to the third paragraph. The third  
24 paragraph says, "special attention shall be given to search  
25 those areas where items could be hidden." And then there's a

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1 comma. We're going to get to what's after the comma in a  
2 minute. "Special attention shall be given to search those  
3 areas where items could be hidden."

4 That's what it says before the comma; am I right?

5 A. Correct.

6 Q. Now, certainly, items can be hidden in bags, correct?

7 A. Correct.

8 Q. Items could be hidden in backpacks, right?

9 A. Yes.

10 Q. But let's now look at what's after the comma. Such as  
11 jacket, jacket linings -- I'm sorry, jacket linings, hidden  
12 pockets, hats, belts, footwear, clothing seams, pant waists,  
13 and/or cuffs.

14 Do you see that there?

15 A. I do.

16 Q. Okay. Each of those eight things relate to the search of a  
17 person, correct?

18 A. They do.

19 Q. Okay. A hat obviously would be on a person, correct?

20 A. Possibly.

21 Q. Yeah. Belts, footwear, these are items that you associate  
22 with the search of a person, correct?

23 A. Correct.

24 Q. Okay. And, again, you don't see any reference to bags or  
25 backpacks or anything like that? At least what we've looked at

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1 so far in this section; am I right?

2 A. Correct.

3 Q. So number four, just so we hit all the different sections,  
4 number four says, "officers shall exercise special attention to  
5 detail to ensure that no detainee is placed in a cell while in  
6 possession of any items which may be used to harm themselves or  
7 others or otherwise be used for the purposes of escape."

8 Do you see that there?

9 A. I do.

10 Q. Okay. And then let's go to number five. Number five talks  
11 about strip searches and body cavity searches.

12 Do you see that there?

13 A. I do.

14 Q. Okay. In regard to that, we're talking about specifically  
15 and exclusively to the search of a person's body, correct?

16 A. Correct.

17 Q. Okay. So, again, there's no reference, and we're already  
18 up to paragraph five here, there's no reference to a bag or a  
19 backpack or anything other than the search of a person, right?

20 A. I believe on number three, after you listed the clothing  
21 seams, the hats, the belts, the footwear, the next sentence,  
22 "the searching officer shall remove all personal property and  
23 itemize the property," when we went over that -- "all personal  
24 property."

25 Q. Okay.

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Nathan Snyder - Cross

1 A. So that would then include everything.

2 Q. All right. I'm glad you brought that up. Let's talk about  
3 that for a second.

4 All right. So the sentence before it, you agree with  
5 me, is eight different things that you associate with a search  
6 of a person, right? We just talked about that a few minutes  
7 ago?

8 A. Yes.

9 Q. Now, what this sentence is saying, and correct me if I'm  
10 wrong, is that the personal property and items of property are  
11 supposed to be put on a detainee property receipt, correct?

12 A. That is correct.

13 Q. So then this sentence introduces a new concept for us,  
14 which we haven't seen so far, that being the detainee property  
15 receipt, correct?

16 A. Correct.

17 Q. And just very briefly, we don't need to belabor the point,  
18 what's the detainee property receipt?

19 A. So, it is referred to as the prisoner property log. It's  
20 just another name for it.

21 Q. Okay. And this is -- and just describe it to us very  
22 briefly. It's a document? It's a physical document; am I  
23 right?

24 A. Correct.

25 Q. I would imagine it has the name of the prisoner, correct?

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Nathan Snyder - Cross

1 A. Correct.

2 Q. I would imagine it would have a different list of entries  
3 of different items of property that are on that log; am I  
4 right?

5 A. Correct.

6 Q. Okay. And so what paragraph three is telling us is that  
7 this property that you've recovered, you have to put all that  
8 on a detainee property receipt; am I right?

9 A. Correct.

10 Q. Okay. All right. Now, so let's go to -- so, five, I think  
11 you agreed with me that strip search, body cavity searches are  
12 uniquely concerned with the search of a person's body, correct?

13 A. Correct.

14 Q. All right. Now let's go to the last paragraph here. All  
15 property removed from the detainee shall be itemized using a  
16 prisoner property form.

17 Do you see that there?

18 A. I do.

19 Q. Okay. So the phrase that's used here is "removed from the  
20 detainee;" am I right?

21 A. Correct.

22 Q. Okay. Again, there's no reference -- and now that we've  
23 gone through this entire section, and you tell me if I'm  
24 missing it, there's no reference anywhere in this section to a  
25 bag, correct?

Q1NDManC

Nathan Snyder - Cross

1 A. No, I do not see anything that says "bag" specifically.

2 Q. Okay. There's no reference to anything other than a search  
3 of the person?

4 A. Not in this general order, no.

5 Q. Okay. So we're just talking the minimum -- 3.1.9, there's  
6 no reference to anything other than the search of a person,  
7 right?

8 A. Right.

9 Q. Okay. Let's go 3.1.10.

10 Now, 3.1.9, as we talked about, was called "required  
11 detainee searches," right?

12 A. Correct.

13 Q. And 3.1.10 is called "secure storage of detainee property;"  
14 am I right?

15 A. Correct.

16 Q. Okay. Now, tell me if this is right, these two sections  
17 work in conjunction with each other in that, under 3.1.9,  
18 property is going to be collected, and then at 3.1.10, property  
19 is going to be stored in a secure fashion; am I right?

20 A. That would be correct.

21 Q. Okay. What we see is we have some of the same phrases.

22 Let me show you what I mean. So, in 3.1.9(6), it says, "all  
23 property removed from the detainee."

24 Do you see that there?

25 A. I do.

Q1NDManC

Nathan Snyder - Cross

1 Q. Okay. Then if we go down to 3.1.10 -- it's the last  
2 paragraph. I think it's a -- no, I'm sorry, it's 2(a). Do you  
3 see that at the bottom?

4 A. Yes.

5 Q. Okay. And it uses that same phrase again, "contraband,  
6 evidence and/or illegal weapons removed from the detainee." We  
7 have that same phrase, "removed from the detainee," right?

8 A. Correct.

9 Q. And, again, in those sections -- and feel free to take a  
10 look at the whole section 3.1.10 -- there's no reference to a  
11 bag or a backpack or something other than the search of a  
12 person?

13 A. I do not see anything there.

14 Q. Okay. Now, I think Her Honor was asking you some  
15 questions, and I wanted to follow up on a few of them. The  
16 idea of safeguarding property -- let me back up a second.

17 Inventory searches are to safeguard personal property;  
18 am I right?

19 A. That is correct.

20 Q. This, these two sections, are not sections explicitly about  
21 evidence per se, things that are going to be used in a  
22 courtroom?

23 A. They're not specific about that, correct.

24 Q. Right. So, you're familiar with not only the three general  
25 orders that my colleague showed you a few minutes ago, you're

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Nathan Snyder - Cross

1 familiar with all of them; fair to say?

2 A. Yes.

3 Q. Okay. We have one I wanted you to take a look at. It's  
4 general order 1.2. It would be -- it's proposed as Defense  
5 Exhibit A.

6 What I'm going to do is I'm going to give you a copy.

7 THE COURT: Do you have a copy for me, Mr. Agnifilo?

8 MR. AGNIFILO: Yes. Yes, of course, Judge.

9 All right. Yes, Judge. Can I approach?

10 THE COURT: You can hand my copy to Ms. Verneus.

11 Thank you.

12 Q. All right. So before we talk about this document, just  
13 tell us briefly what it is.

14 A. It is the Altoona Police Department's general order 1.2.

15 Q. Okay. And if we can go to the last page. Feel free to  
16 flip to the last page of it. It's page 15.

17 And we see the same name of the same police chief,  
18 Chief Janice Freehling.

19 Do you see that?

20 A. That is correct.

21 MR. AGNIFILO: Your Honor, we offer this as Defense  
22 Exhibit A.

23 MR. GENTILE: No objection.

24 THE COURT: All right. Defense A is admitted.

25 (Defendant's Exhibit A received in evidence)

Q1NDManC

Nathan Snyder - Cross

1 Q. So, Defense Exhibit A, if we look at -- I've been meaning  
2 to ask you -- I'm meeting you for the first time, so I've been  
3 meaning to ask you a lot of things -- on the first page, you  
4 see it states "index words?"

5 A. Yes.

6 Q. It says "index words," but those are basically the  
7 different types of information that's going to be in that  
8 general order; am I right?

9 A. That would be correct.

10 Q. All right. So if we look at the third entry here, it says,  
11 "statutory authorizations."

12 That's the first thing, right?

13 A. Right.

14 Q. Then it says "in-custody procedures," the second thing,  
15 right?

16 A. That's correct.

17 Q. And then it says, "search and seizure procedures," right?

18 A. Correct.

19 Q. So is it fair to say this is a general order that deals  
20 with the procedures around search and seizure?

21 A. Correct.

22 Q. All right. So let's go through this and just -- we're not  
23 going to belabor, just a little bit more detail. We're going  
24 to look on page 2. We're going to look at the top of page 2,  
25 1.2.1.

Q1NDManC

Nathan Snyder - Cross

1 Do you see that there?

2 A. Yes.

3 Q. It says, "agency statutory authorizations."

4 Do you see that?

5 A. I do.

6 Q. Okay. And it says, under A, "United States Constitution,  
7 the Constitution of the Commonwealth of Pennsylvania, the  
8 Pennsylvania Rules of Criminal Procedure, Title 234, and the  
9 Third Class City Code define the legal authority granted to the  
10 Altoona Police Department as it pertains to the enforcement of  
11 codified laws, statutes and ordinances."

12 It says that there, right?

13 A. Correct.

14 Q. Okay. Now, is it right, is it your understanding of that  
15 paragraph and the rules generally that the Altoona Police  
16 Department is saying that, our general orders are going to be  
17 in accordance with, for instance, the Constitution of the  
18 United States of America?

19 A. That is correct.

20 Q. And the Constitution of the Commonwealth of Pennsylvania,  
21 right?

22 A. Correct.

23 Q. And these other legal laws and rules that are listed here,  
24 correct?

25 A. Correct.

Q1NDManC

Nathan Snyder - Cross

1 Q. All right. Let's look very briefly on page 3. I think  
2 this is subsumed by what we just talked about.

3 On the top there it says, "policy." Do you see that  
4 on the top of page 3?

5 A. Yes, I do.

6 Q. Okay. And it says, "it is the sworn responsibility of all  
7 members of the Altoona Police Department to comply with the  
8 constitutional requirements regarding in-custody situations,  
9 including but not limited to" -- then there are a number of  
10 entries, and one of them is "search and seizure," right?

11 A. Correct.

12 Q. Okay. So one of the obligations of the officers and other  
13 folks who work for the Altoona Police Department is that their  
14 procedures have to follow the U.S. Constitution; am I right?

15 A. Correct.

16 Q. And the other laws that were outlined in that paragraph we  
17 just looked at a little while ago, right?

18 A. Correct.

19 Q. Okay. Now, there are a number -- if we look on page 5, so  
20 we get to page 5 -- and just look up at me when you're done.

21 Okay. Thank you. So, it's 1.2.3, and it says "search and  
22 seizure without a warrant procedures."

23 Do you see that?

24 A. I do.

25 Q. Okay. There are a number -- and I'm going to -- we're

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Nathan Snyder - Cross

1 going to go sort of -- I'm going to have you thumb through  
2 pages 5, 6 and 7. There are a number of different types of  
3 searches that are listed under there, and we're going to talk  
4 about them one by one. We're not going to talk about a lot of  
5 them in great detail at all.

6 The first one on the bottom of page 5, "search by  
7 consent," that's A, right, search by consent?

8 A. Correct.

9 MR. GENTILE: Objection, your Honor. We're going  
10 beyond the scope of the very narrow lane of inquiry the Court  
11 set out for this, the securing and inventorying of property of  
12 an arrested person in a public place. We're now venturing into  
13 search and seizure law and consent and probable cause, and that  
14 is not the focus of today's hearing, at least from the  
15 government's perspective.

16 THE COURT: Understood.

17 Where is this going, Mr. Agnifilo?

18 MR. AGNIFILO: So, where we're going is I believe that  
19 the direct examination does not capture the entirety of what  
20 the obligations of the Altoona Police Department are, and this  
21 is where I'm getting to with the Chief, is that what we see in  
22 the inventory procedures later in the general orders, in  
23 chapter three of the general orders, are all informed by the  
24 earlier chapters of the general orders, including this one in  
25 the first section.

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Nathan Snyder - Cross

1 THE COURT: So let's try to get to that point a little  
2 bit faster.

3 MR. AGNIFILO: Yes. Very good.

4 THE COURT: I mean, we can assume Deputy Snyder is  
5 familiar with these orders. He said that a number of times.

6 MR. AGNIFILO: Yes.

7 THE COURT: I don't think you have to orient him.  
8 Just get to the part that's relevant to this.

9 BY MR. AGNIFILO:

10 Q. Let's get right to it. Let's go to page 8. Page 8 talks  
11 about "impound inventory search."

12 Do you see that there?

13 A. Yes, I do.

14 Q. All right. And this is talking about impounded vehicles;  
15 am I right?

16 A. That is correct.

17 Q. Which we don't have in this case, correct? I mean, as far  
18 as you know?

19 A. I am unaware.

20 Q. Very good. All right. But in the section on impounded  
21 vehicles, this particular order, for instance, talks about how  
22 to deal with closed containers, correct?

23 A. Where is that --

24 Q. Let me not make you look for it. Fourth line down. It  
25 says, "when inventorying a vehicle, all closed containers will

Q1NDManC

Nathan Snyder - Cross

1 be searched unless the contents can easily be ascertained."

2 Do you see that there?

3 A. I do.

4 Q. Okay. So here now I want to get back to what we were  
5 talking about a few minutes ago. When I asked you before, in  
6 the two sections you reviewed on direct examination and then  
7 with me on cross, there was no mention in those sections, for  
8 instance, of a backpack. I asked you that a few times, right?

9 A. Right.

10 Q. Or a bag of any sort, correct?

11 A. Correct.

12 Q. Or "any closed container" was not mentioned in that section  
13 we spoke about a few minutes ago, correct?

14 A. Correct.

15 Q. But you'll agree with me that when the chief, when the  
16 police chief who signed these orders wants closed containers to  
17 be able to be searched, that could be written into the order as  
18 it is here?

19 A. I am unaware of what she wanted at that time.

20 Q. Okay. But you agree with me that there is a provision for  
21 searching closed containers in the impound section having to do  
22 with vehicles, correct?

23 A. Correct.

24 Q. Now, the idea of an inventory search is safeguarding a  
25 prisoner's property pending whatever's going to come next in

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Nathan Snyder - Cross

1 that person's situation, whether they be released, whether they  
2 go to prison, whatever the situation may be, correct?

3 A. Correct.

4 Q. Okay. It is not -- tell me if this is right. It is not a  
5 typical inventory situation when all of the items are going to  
6 be given to another police department, for instance, in a  
7 murder investigation?

8 MR. GENTILE: Objection.

9 THE COURT: Is there a difference, Deputy Snyder, in  
10 your inventory practices if you're going to hand something over  
11 to another department or if you know that Altoona is keeping  
12 the investigation? Does that have any effect on your practices  
13 with regard to inventorying bags or things of that nature?

14 THE WITNESS: As far as the inventory, no.

15 Q. Fair to say, the inventory process does not contemplate  
16 that this is all going to be used as evidence; am I right?

17 A. I'm not sure I understand.

18 Q. Let me ask you a better question. That's fair enough.

19 The purpose of inventorying, I think you've identified  
20 three different purposes, and I want to make sure I have this  
21 right. You want to make sure that the person's property is  
22 returned to them and it's not lost, correct?

23 A. Correct.

24 Q. You want to make sure that it's not damaged, right?

25 A. Correct.

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Nathan Snyder - Cross

1 Q. And you want to make sure that the police personnel and  
2 others who might be in close proximity with that property are  
3 safe; am I right?

4 A. Correct.

5 Q. Okay. None of those purposes relate to the handling of  
6 evidence to be used in a criminal case; am I right?

7 A. Correct.

8 Q. Bear with me one second, Chief.

9 MR. AGNIFILO: Your Honor, just give me one second,  
10 please.

11 Q. Chief, I think we talked a little bit ago about a prisoner  
12 log, right?

13 A. Correct.

14 Q. I'm going to show you a copy.

15 You're familiar with them generally I imagine, right?

16 A. Yes.

17 Q. I'm going to show you a copy, and I'm just going to ask you  
18 some specific questions. You can refer to it or, if you  
19 remember independently, you can answer that way.

20 MR. AGNIFILO: So, if your Honor is okay, I'll  
21 approach the chief and just give him a sample department  
22 prisoner log.

23 THE COURT: Is there a copy for me, also?

24 MR. AGNIFILO: Yes, Judge.

25 This is actually the one in this case, but we're not

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Nathan Snyder - Cross

1 looking to put it into evidence.

2 THE COURT: Okay. So it's just, in effect, as a  
3 demonstrative, Mr. Agnifilo?

4 MR. AGNIFILO: Yes.

5 THE COURT: Just for the record, the witness has been  
6 handed an exhibit marked as Defense Exhibit B for  
7 identification.

8 MR. AGNIFILO: Yes, Judge. Thank you. This is  
9 Defense B for identification.

10 Q. Okay. So, this is an Altoona Police Department prisoner  
11 log; am I right?

12 A. That is correct.

13 Q. Okay. I really just want to look down about one-third from  
14 the bottom where it says "prisoner property."

15 Do you see that there?

16 A. Yes.

17 Q. Now, correct me if I'm wrong, there are a number of entries  
18 on this particular prisoner log, which are belt, wallet,  
19 jacket, hat, purse, watch, rings, necklace, and earrings.

20 Do you see those there?

21 A. I do see them.

22 Q. Okay. There's no reference anywhere in this document, am I  
23 right, to bags, backpacks, or things of that nature?

24 A. That would be under "other items."

25 Q. Okay. Other items?

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Nathan Snyder - Cross

1 A. Yes. Correct.

2 Q. But there's nothing specifically to reflect bags or  
3 backpacks or things like that?

4 A. No.

5 Q. Okay. Now, in terms of an inventorying procedure, correct  
6 me if I'm wrong, there would be no reason to read entries in,  
7 for instance, a notebook or a journal; am I right?

8 A. Typically, not something that would be done.

9 Q. Okay. It's something that you might want to photograph the  
10 entirety of the journal to see what condition it's in, but  
11 there would be no reason to read each page, correct?

12 A. I'd say that's correct.

13 Q. And we're getting to the end. I want to go through some of  
14 the other sections that you went through with my colleague  
15 here.

16 All right. Let's look at general order 3.6. Do you  
17 have that in front of you?

18 A. I do.

19 Q. You do. Can you take a look at it for a second?

20 THE COURT: Just for the record, that's Government  
21 Exhibit Two.

22 MR. AGNIFILO: It is Government Exhibit Two.

23 Q. So, here it talks -- in the "index words," it says,  
24 evidence, found and/or abandoned property, recovered property.

25 Do you see that there?

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Nathan Snyder - Cross

1 A. I do see that.

2 Q. Okay. Now, if we look at pages 6 and 7, under 3.6.6, it  
3 talks about documented inspections, inventory, and audits  
4 required.

5 Do you see that there?

6 A. Yes, sir.

7 Q. Okay. And then the first thing it talks about is "annual  
8 inspection."

9 Do you see that there?

10 A. I do.

11 Q. What's an annual inspection?

12 Let me read, just so you don't -- if you know what it  
13 is, you can give an answer. If not, I'm happy to read it to  
14 you.

15 A. I do. So, it's an annual inspection of the evidence room.

16 Q. Okay. So that has nothing to do with an inventory per se,  
17 in regard to a specific person?

18 A. Not that I am aware of.

19 Q. Okay. Now, is this section here, 3.6.6, is this a section  
20 that has to do with the auditing and sort of self, you know,  
21 regulation of the evidence room?

22 A. Yes.

23 Q. All right. So this is basically a principle of quality  
24 control that the Altoona Police Department uses to make sure  
25 that everything in the evidence room is kept in good order?

Q1NDManC

Nathan Snyder - Cross

1 A. Correct.

2 Q. All right. Let's look at general order 3.5, which is  
3 Government Exhibit Three. Do you have that in front of you,  
4 Chief? If not, we can get you --

5 A. I do not.

6 Q. Yes. Let me get it to you. Let me get it to you.

7 MR. AGNIFILO: Does your Honor want a copy of 3.5?

8 THE COURT: I have it. Thank you, Mr. Agnifilo.

9 Q. Okay. Let me approach the witness.

10 Take a look at it, and I have just a couple questions  
11 for you. We're really winding down.

12 So, in that first section, under "purpose," it talks  
13 about the integrity of the chain of custody of evidence.

14 Do you see that there in the second -- that second  
15 line there?

16 A. Yes, I do.

17 Q. All right. And tell me if this is right. Chain of custody  
18 is a principle where pieces of evidence will always be able to  
19 know who had it, that it was logged properly, so if you want to  
20 use it in a court proceeding, it can be admissible; is that  
21 basically right?

22 A. Sounds like a basic principle.

23 Q. All right. It sounds like something a lawyer would say.

24 So, now, if we look at page 3, under "physical evidence," under  
25 (2), it says -- tell me, are you there?

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Nathan Snyder - Cross

1 A. Yes.

2 Q. Okay. It says, "when an officer receives physical  
3 evidence, he or she shall maintain a secure chain of custody."  
4 You see that phrase again, right?

5 A. Yes.

6 Q. Okay. So this is a section that has to do with the  
7 collection of evidence; am I right?

8 A. Correct.

9 Q. All right. And the maintenance of a chain of custody of  
10 collected evidence, correct?

11 A. Correct.

12 Q. Okay. So that could be used and admitted someday in a  
13 court proceeding if it gets to that?

14 A. If that's where it goes, yes.

15 Q. All right. One second, Chief.

16 MR. AGNIFILO: One second, Judge.

17 Q. All right. A few more questions, Chief, and then I'll be  
18 done.

19 Fair to say -- I think we talked about it at the  
20 outset -- the general orders, the general orders are a much  
21 more thorough discussion of the different subject matters  
22 covered than are the task sheets; is that fair to say?

23 A. They're a little deeper into that -- I'm not understanding.

24 Q. Yes. Sure. The general orders that we've been covering  
25 cover these different subjects in great detail; am I right?

Q1NDManC

Nathan Snyder - Cross

1 A. Not as -- I would disagree, when we're talking about the  
2 task sheets, like I explained before, for new probationary  
3 officers, we try to break it down a little better for them.  
4 Again, they don't know -- they're not a 10-year veteran officer  
5 that understands maybe the lingo or some of the terminology  
6 used. So, for the new guys, I would say the task sheets are  
7 broken down a little bit better.

8 Q. But the task sheets are essentially -- they're not issued  
9 by the police chief, correct?

10 A. They're issued as part of our manual to the new guys, and  
11 it is something they have to pass in order to continue on in  
12 the training program.

13 Q. Right. But whereas the general orders are actually orders  
14 from the police chief, the task sheets are not.

15 A. The general order is an order. Yes. Correct.

16 Q. And the task sheets are not an order in the same way; am I  
17 right?

18 A. I guess it depends on what you mean. Like I said, you  
19 can't -- in order for probationary officers to get off  
20 probation, he has to complete those task sheets and show that  
21 he has knowledge on those task sheets. If he does not sign off  
22 on the task sheet, he will not move further in the FTO program.

23 Q. And just so I understand --

24 THE COURT: Go ahead, Mr. Agnifilo, and then I'll ask  
25 my question.

Q1NDManC

Nathan Snyder - Cross

1 Q. Sure. When you say "sign off," I'm not clear on what  
2 you're saying. He signs off on the task sheets. Just tell us  
3 what that means.

4 A. Oh, basically, when the task sheet is presented to the  
5 probationary officer and the FTO explains it and the probation  
6 officer reads it and everything, they go out and do the  
7 demonstration, show how it's applicable in the field, come  
8 back. Then a supervisor -- their kind of last step as a new  
9 guy, their supervisor would quiz them on that task sheet.

10 Once the supervisor feels, hey, this probational  
11 officer is proficient in this task, he or she will sign it.  
12 That piece of paper will be training paperwork for the day, and  
13 we will check that off as one of their completions of task  
14 sheets required for them for that step in the training program.  
15 Then they can continue to move forward.

16 Q. All right.

17 THE COURT: Can any random person in the Altoona  
18 Police Department prepare those task sheets and check them off  
19 and sign them?

20 THE WITNESS: So, we require our probationary officers  
21 to only sign them off with supervisors who have been FTOs.

22 THE COURT: Those are people designated by the chief  
23 of the department to conduct this training, right?

24 THE WITNESS: That is correct.

25 THE COURT: Go ahead, Mr. Agnifilo.

Q1NDManC

Nathan Snyder - Cross

1 MR. AGNIFILO: Yes. Thank you, Judge.

2 Q. Do you know how the general orders are prepared?

3 A. As far as typed up or --

4 Q. Is there a meet -- because now you're a deputy chief. Are  
5 there meetings to refine them as time goes on? Have you ever  
6 had any input into what goes into a general order?

7 I'm just trying to figure out how they get to be what  
8 they are.

9 A. I do not.

10 Q. Fair enough. Give me one second.

11 MR. AGNIFILO: Sir, thank you. It was very nice  
12 meeting you. Safe travels back to Pennsylvania.

13 THE WITNESS: Thank you.

14 THE COURT: Chief, I just have a question. I want to  
15 make sure I understand. Let's go back to my example where  
16 you're arresting me on a public bus, right? So, for purposes  
17 of the example, there's maybe a probationary police officer.  
18 You're the field training officer making sure that they follow  
19 all the procedures.

20 You approach me. Ma'am, stand up, please. What's  
21 this all about? You say, ma'am, I need you to stand up. I  
22 stand up. I'm handcuffed, and I'm told I'm going to be placed  
23 under arrest. On the seat next to me, towards the window, is a  
24 purse, a large one for these purposes, and the officer asks me,  
25 as we went over before, ma'am, is that your bag. I say, yes.

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Nathan Snyder - Cross

1 Walk me through everything that happens next if you  
2 are teaching a probationary officer what to do in that  
3 situation. What's the next thing that's going to happen?

4 THE WITNESS: So, I'm going to instruct the  
5 probationary officer, okay, now that you are secured, go ahead  
6 and let's pat her down, make sure there's no obvious weapons,  
7 anything like that that can obstruct or hurt us or them. I'm  
8 going to have him or her do that. We're going to take the bag.  
9 We're probably going to move off the bus, because it's not  
10 really a controlled environment. Preferably -- we're being  
11 hypothetical -- on the street, move to the patrol car, where  
12 that way we can secure you in the car. At that time, we'd do  
13 probably a very brief check through the bag to make sure we're  
14 not -- you know, in our neck of the woods, there's a lot of  
15 drugs, so I wouldn't want anything that could pass through the  
16 system and we could smell or inhale or anything like that. And  
17 I would teach him or her that. This is what we're doing.  
18 We're checking to make sure there's nothing in here that can  
19 hurt us or hurt her while we're transporting it.

20 Once we go back to the station, once we go to the  
21 station, we'd bring you in the alley door. We'd then secure  
22 you there. We have a place we secure people we bring in.

23 THE COURT: Is that the holding cell or --

24 THE WITNESS: It's actually like an intake area. It's  
25 got like a shackle to the floor, and that's where we would

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Nathan Snyder - Cross

1 secure them.

2 THE COURT: Then what happens to my bag?

3 THE WITNESS: It's brought with you into the station,  
4 and we have a big table that's sitting right there when you  
5 come in the door. So we set the bag down, and I would tell the  
6 probationary officer, I'd say, okay, go ahead, give her  
7 instruction, uncuff her, and then let's begin with our search.

8 And we'd focus on you first. So we'd uncuff you.  
9 Hand me your jacket. Hand me your shirt, your gloves. You  
10 need to take your jewelry off. Go through that whole thing.  
11 If there's a female there, we'd have a female come out and pat  
12 you down further.

13 In the meantime, we're placing all the things on this  
14 big table, all the items that we've seized.

15 THE COURT: So as you're removing my jewelry, my  
16 jacket, that's all going on the same table?

17 THE WITNESS: Correct.

18 THE COURT: Okay.

19 THE WITNESS: If it was just the case of me and a  
20 probationary officer, which typically there's always two people  
21 there, I would then take that probationary officer and say,  
22 okay, we've got her taken care of. Now, this is the form.  
23 This is what we need to fill out. She had a necklace. See  
24 right here down at the bottom? Necklace. Boom. And we'd go  
25 through those items. She has a backpack. It's not listed

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Nathan Snyder - Cross

1 there, because we can't hardly list everything possible. You  
2 know, that form would be 20, 30 pages long.

3 But then we would start inventorying what you have in  
4 that bag. Okay. She has two pair of socks, you know, she's  
5 got a radio, she's got this, that. We'd inventory all that on  
6 the sheet. As long as we didn't pull out anything that was  
7 contraband or evidentiary, that we'd deem evidentiary -- like,  
8 if you had drugs, obviously, that would be contraband.

9 Everything else is going to get shoved back into that bag, all  
10 that personal property. We try to put necklaces and things  
11 that could be lost in like a folder. We explain this to them  
12 as I'm doing it. You'd be standing there watching it all.  
13 Obviously, body cams and station video is on.

14 Then we'd take that, and right beside where we're at,  
15 there are eight, nine lockers, and they have locks on them.  
16 We'd take that property, put it in there, and I'd say, okay,  
17 it's important, locker number one, and he would write that on  
18 the sheet, one. So then we would know locker one is your  
19 property for when you get released or transferred or whatever.

20 THE COURT: If my bag is zipped closed, why not just  
21 take the bag and just put that in a locker without opening it?

22 THE WITNESS: Again, I don't know what is in that bag  
23 to, A, safeguard. I don't know if there is something in there  
24 that could hurt any of the officers walking by that locker. I  
25 don't know what you're capable of. I just met you. So, you

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Nathan Snyder - Cross

1 know, for our safety, for your safety in that facility we're  
2 going to check and inventory those things.

3 THE COURT: What if there's money or other valuables  
4 inside the bag that aren't evidence or that are valuables? Why  
5 do you need to identify and inventory those things?

6 THE WITNESS: Well, again, those are your personal  
7 belongings, and they're of value to you. We don't ever want to  
8 be accused of taking anything. We want you to get all your  
9 stuff back. And since it's your belongings, you need it back,  
10 so we will document that on there.

11 There's a money total. I think we break it down into  
12 bills and changes. And, you know, I would hate for you to come  
13 up with \$2,000 missing, and that might not even be our  
14 department. If we're transferring you, we have no way of  
15 knowing what another place or facility may or may not lose, so  
16 that's why we also have a place for people taking custody of  
17 the prisoner to sign for that personal property, so that way  
18 they know what they're getting, too.

19 THE COURT: Thank you, sir.

20 MR. AGNIFILO: Your Honor, can I ask a follow-up  
21 question? It will be very brief.

22 THE COURT: Well, yes. Yes.

23 BY MR. AGNIFILO:

24 Q. Chief, if you found something illegal, cocaine, a firearm  
25 magazine, would you do anything other than continue with the

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Nathan Snyder - Redirect

1 inventory search?

2 A. In this specific instance --

3 Q. Yes.

4 A. -- that she said?

5 Q. Yes.

6 A. No. We would stop at that point, in her instance.

7 Q. And what would you do?

8 A. At that point we'd probably go get a search warrant.

9 Q. Okay. And so that's the procedure?

10 A. That specific instance, yes, with that set of facts.

11 Q. Okay. So if you had a bag, you were prepared to inventory  
12 the bag, you found something illegal, like a firearm magazine  
13 or something like that, you would stop and get a search  
14 warrant?

15 A. Again, in this specific incident that the judge just  
16 outlined --

17 Q. Yes.

18 A. Yes, in her case.

19 Q. Got it. That's all I need to know. Thank you.

20 THE COURT: Mr. Gentile.

21 MR. GENTILE: Briefly, your Honor. Thank you.

22 REDIRECT EXAMINATION

23 BY MR. GENTILE:

24 Q. Chief, I just want to pick up where Mr. Agnifilo left off  
25 regarding the inventory search process. If you found a

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Nathan Snyder - Redirect

1 magazine in someone's purse or bag, if you found contraband,  
2 drugs or gambling records or something like that, would you  
3 stop the search and then apply for a search warrant in that  
4 situation?

5 A. That would be correct.

6 Q. But if you found something that was dangerous, like a  
7 magazine or firearm, would you stop searching then, even though  
8 there might be a gun attached to that or something even more  
9 harmful?

10 A. No, not necessarily.

11 Q. Would you continue searching to see if there were any other  
12 dangerous items that would expose other officers or the  
13 community to danger?

14 A. Sure.

15 THE COURT: I'm sorry. What was that answer?

16 THE WITNESS: Sure. Yes. I'm sorry.

17 Q. Chief, we went through several categories of property in  
18 your direct examination, including found property, abandoned  
19 property, evidence and personal property.

20 Do you recall that?

21 A. Yes.

22 Q. And Mr. Agnifilo went through one specific section of the  
23 general order that applied to personal property, right?

24 A. Correct.

25 Q. In all those categories of property, do they all require

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Nathan Snyder - Redirect

1 some sort of securing or inventorying of that property, whether  
2 it's found, abandoned, evidentiary or personal?

3 A. Correct.

4 Q. With respect to the task sheets, in order for the -- you  
5 said that the task sheets are part of the manual; is that  
6 right?

7 A. That is correct.

8 Q. In order for the task sheet to be part of the manual, does  
9 the chief have to authorize that?

10 A. Can you ask that again, please?

11 Q. In other words, doesn't someone in authority have to  
12 provide some sort of approval for anything that's entered into  
13 the manual?

14 A. Correct. Yes.

15 Q. And the inventory process, I believe you spoke -- you  
16 answered some questions from Mr. Agnifilo about -- or,  
17 actually, from the judge regarding the purposes of the  
18 inventory search. It's not just to give or to account for a  
19 detainee's personal property, is it? It's also about a safety  
20 issue, right?

21 A. Correct.

22 Q. Is it also about an accountability issue for the  
23 department, that you know what property you're in possession  
24 of, and this way, if you're going to give some of that property  
25 back, you know how much and what type of property you're

Q1NDManC

Nathan Snyder - Recross

1 returning?

2 A. Correct.

3 MR. GENTILE: Thank you, Judge.

4 MR. AGNIFILO: Your Honor, I have two questions, just  
5 following up.

6 RECROSS EXAMINATION

7 BY MR. AGNIFILO:

8 Q. Chief, do you still have Defense Exhibit A in front of you?  
9 It's general order 1.2, already in evidence.

10 A. Which general order?

11 Q. It's 1.2, Chief.

12 THE COURT: It has a big A on it.

13 Q. Yes. It has a big A on the first page at the bottom.

14 A. Got it.

15 Q. Do me a favor and go to page 8. And I'm going to direct  
16 your attention to the last two lines on page 8.

17 Do you see that there?

18 A. I do.

19 Q. I'm going to read it to you. "If during an inventory  
20 search, evidence of a crime is discovered, the officer shall  
21 stop the inventory search and secure a search warrant prior to  
22 continuing."

23 Is that what it says?

24 A. That is what it says.

25 Q. Thank you.

Q1NDManC

Nathan Snyder - Recross

1 MR. GENTILE: Your Honor, I just want to -- one  
2 question.

3 REDIRECT EXAMINATION

4 BY MR. GENTILE:

5 Q. That section that you just read for Mr. Agnifilo, that's  
6 under "impound inventory search;" is that right?

7 A. That's right.

8 Q. Does that pertain to vehicles?

9 A. That is correct.

10 Q. Thank you.

11 RECROSS EXAMINATION

12 BY MR. AGNIFILO:

13 Q. Is there anything in any general order that says that the  
14 rules are different for vehicles as opposed to other property?

15 A. I would have to look through our general orders.

16 Q. Thank you.

17 A. I don't want to give you false information.

18 Q. Okay. Thank you.

19 MR. GENTILE: Nothing further from the government.

20 Thank you.

21 THE COURT: All right. You are excused, sir. Thank  
22 you very much.

23 Mr. Gentile, anything else from the government while  
24 we're all here together?

25 MR. GENTILE: No, your Honor.

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Nathan Snyder - Recross

1 THE COURT: Mr. Agnifilo?

2 MR. AGNIFILO: I don't believe so. Thank you, your  
3 Honor.

4 THE COURT: Thank you all very much. I've found this  
5 very helpful. I'll see you in a week.

6 (Adjourned)

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