

ORIGINAL

COMMONWEALTH OF
PENNSYLVANIA,

v.

LUGI NICHOLAS MANGIONE,
Defendant.

: IN THE COURT OF COMMON PLEAS OF
: BLAIR COUNTY, PENNSYLVANIA

:
: No. CP-07-CR-0002724-2024

:
: **Type of Document:**
: Omnibus Pretrial Motion for Relief

:
: **Filed on behalf of:**
: Luigi Nicholas Mangione, Defendant

:
: **Attorney for Defendant:**
: Thomas M. Dickey, Esquire
: Pennsylvania ID # 41475

:
: **TOM DICKEY LAW OFFICES, P.C.**
: 308 Orchard Avenue
: Altoona, PA 16602

:
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TO THE HONORABLE MEMBERS OF THE
LEGISLATIVE ASSEMBLY
OF THE PROVINCE OF ONTARIO

IN THE COURT OF COMMON PLEAS OF
BLAIR COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA

NO.CP-07-CR-0002724-2024

OTN F1009165-3

vs.

LUIGI NICHOLAS MANGIONE

FILED
BLAIR COUNTY
ROBIN G. PATTON
2025 FEB 21 PM 3:34
CLERK OF DISTRICT JUDICIAL COURTS
BLAIR COUNTY

OMNIBUS PRETRIAL MOTION FOR RELIEF

AND, NOW, comes LUIGI NICHOLAS MANGIONE, Defendant above named, by and through his attorney, Thomas M. Dickey, Esquire, and, pursuant to *Pa.R.Crim.P. 578, et seq.*, submits the following:

Petition for Writ of Habeas Corpus

1. The Defendant, the petitioner herein, is restrained of his liberty in the instant charges, inasmuch as bail was denied at preliminary arraignment by Magisterial District Judge Benjamin Frederick Jones of this judicial district by order entered at MJ-24102-CR-0000623-2024 on December 9, 2024, which bail has not been modified or reduced.
2. A Preliminary Hearing was originally scheduled for December 23, 2024, however, was moved and rescheduled for December 19, 2024, in order to coincide with an Extradition Hearing scheduled for the same date.
3. In proceedings before Magisterial District Judge Jones, District 24-1-02, at MJ-24102-CR-0000623-2024, on December 19, 2024, the Defendant waived the instant charges to the Court of Common Pleas of Blair County. This

waiver was subject to a contemporaneous agreement pursuant to **Pa.R.Crim.P. 541(A)**, appearing of record on the docket at MJ-24102-CR-0000623-2024, which thereby preserved a later challenge to the sufficiency of the Commonwealth's *prima facie* case, as set forth in the copy of a page in the docket entries of said proceedings available from the UJS portal attached as "Exhibit A" hereto.

4. The instant charges, as alleged in the Criminal Information filed of record on December 31, 2024, at 11:29 a.m.; charged: (i) Count 1, Forgery – Utters Forged Writing, in violation of **18 Pa. C.S. § 4101(a)(3)**, a felony of the third degree; (ii) Count 2, Firearms Not to Be carried W/O License, in violation of **18 Pa.C.S. § 6106(a)(1)**, a felony of the third degree; (iii) Count 3, Tamper Records or Identification – Writings, in violation of **18 Pa.C.S. § 4104(a)**, a misdemeanor of the first degree; and (iv) Count 4, Possess Instrument of Crime in violation of **18 Pa.C.S. § 907(a)**, a misdemeanor of the first degree, and (v) Count 5, False Identification to Law Enforcement Officer, in violation of **18 Pa.C.S. § 4914(a)**, a misdemeanor of the third degree.

5. The Defendant believes that the instant charges are not supported by a *prima facie* case, so that the petitioner's detention or confinement on the instant charges is illegal.

6. Petitioner further avers that any evidence seized, obtained, or in the possession of law enforcement and/or the Commonwealth, purportedly in support of any of the instant charges, was obtained illegally and unlawfully for reasons set forth, *supra*, in Defendant's Motion to Suppress.

7. The Petitioner is **not** restrained herein by virtue of sentence after conviction for a criminal offense within the contemplation of **42 Pa.C.S. § 6503(b)**.

8. The privilege of a writ of habeas corpus is not now suspended in the case of rebellion or invasion when the public safety may require it.

9. Pursuant to **Pa.R.Crim.P. 108(A)**, venue for this petition for writ of habeas corpus, which challenges the legality of the petitioner's detention or confinement in a criminal matter on the grounds of insufficient evidence of a *prima facie* case, lies with the Court of Common Pleas of Blair County, being the judicial district in which the order directing the petitioner's detention or confinement was entered.

WHEREFORE, pursuant to **42 Pa.C.S. § 6501, et seq.**, the Defendant prays that the Court issue a writ of habeas corpus and, after requisite proceedings, grant relief:

- A) By discharging the Defendant in the above captioned criminal action;
- B) Should discharge in whole not be warranted, quash such charges that are not supported by a *prima facie* case; and/or
- C) Grant such other relief as justice may require.

Motion to Suppress Evidence

10. All previous paragraphs are hereby incorporated as though fully set forth herein.

11. On or about December 9, 2024, at approximately 9:29 a.m. Defendant was approached in a McDonalds, located at 407 East Plank Road, Altoona, PA 16602 by two (2) uniformed, armed, and fully equipped officers of the

Altoona Police Department (Detwiler and Frye). Said uniforms exhibited badges (patches) and other identifying insignia indicating their identity as police officers.

12. Defendant was seated at a corner dining table that had a wall directly behind him and to his left. There also was another unoccupied chair to his immediate right. Defendant's only natural path and/or route of ingress/egress was to his right.

13. Upon their arrival, Altoona Police Officer (Detwiler) immediately posted himself to the right of the Defendant, and within an approximate arm's length of the Defendant. This action taken in order to detain and/or totally curtail the liberty of the Defendant, and to restrict the Defendant's path of travel or ingress/egress from the table where he was sitting. These actions were performed to clearly exhibit said Officer's authority over Defendant. The unoccupied chair was between the law enforcement officer and the Defendant.

14. No explanation was given to the Defendant relative to why the police approached him at McDonalds. At most, police indicated that he had "looked suspicious" and had over stayed his welcome as patron at McDonalds. It is stressed that Defendant was being detained, and other than that he merely had over stayed his welcome as a patron at McDonalds. Defendant had been at McDonalds as a paying customer for approximately thirty (30) minutes. It is clear that Altoona Police provides a specious and unreasonable reason for approaching Defendant. To wit: It must be assumed that Defendant was being detained for an investigation to which he was not informed.

15. The accompanying Altoona Police Officer (Frye) positioned himself next to Detwiler's right and next to the dining table, resulting in the formation of a human law enforcement wall, further detaining and totally curtailing Defendant's liberty; while additionally restricting Defendant's path of travel, or ingress/egress from the table at which he was seated. The existence, position, and placement of the (2) two Altoona Police Officers was intentionally done to further exhibit said officers' authority over Defendant.

16. At no time did the two (2) officers indicate that Defendant was free to go; nor did they explain the reasons as to why Defendant was being detained; other than that, he looked suspicious and/or over stayed his welcome as a customer at McDonalds.

17. Upon approaching the Defendant, Officer Detwiler immediately made commands and instructions to the Defendant, including but not limited to, providing his identification, standing up, placing hands on head, etc. The totality of the circumstances, including, but not limited to, the positioning, demeanor, mannerisms, commands, directives, instructions and other actions of the Altoona Police Department, showed that at the time the request for identification was made, that compliance with this request was required.

18. Defendant avers that the totality of these circumstances clearly show that he was seized and unlawfully detained at this time; and was in custody of the Altoona Police Department. Any reasonable person in the Defendant's position would have thought that he/she was being restrained, detained and otherwise not free to leave. The curtailment of Defendant's liberty and the detaining of the

Defendant at this time was in violation and in contravention of the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

19. Both police officers from the Altoona Police Department continued to interrogate and question the Defendant, without any reading of his *Miranda* Rights as required by both the Constitution of the United States as well as the Pennsylvania Constitution. These questions were designed to potentially incriminate the Defendant.

20. At no time did the Defendant exhibit any threatening gesture or other show of force.

21. Officer Detwiler further directed and commanded the Defendant to stand up in order to undergo a *Terry* frisk (pat down), although no circumstances existed at that time justifying said action. It is averred that said actions were further performed in order to clearly exhibit the Altoona Police Officers dominion and control of the Defendant, as well as to further exhibit their power and authority over the Defendant.

22. The Altoona Police Department took possession and control of identification materials presented by Defendant, and continued retention of this material. The positioning of law enforcement Officers/personnel and the retention of a person's identification materials for a background check, evidence of criminal activity, and/or other investigative measures, signal to a reasonable person that they are implicitly commanding that person to remain on scene while doing so.

23. At one point, Officer Detwiler walked outside the McDonalds while in

possession of identification materials. During that brief interval, Officer Frye remained with the Defendant within and arm's length and continued to curtail the liberty of the Defendant, block his route/path of travel, ingress/egress and movement from the dining table at McDonalds.

24. It is clear that the Altoona Police Officer used the identification material and other information obtained via their interrogation for use as a background check and other investigative measures. The Altoona Police Department continued to interrogate the Defendant.

25. Within minutes other members of the Altoona Police Department, both uniformed and plain clothes, arrived at the McDonalds. This resulted in the Defendant path of travel from the dining table being blocked and prevented by (2) two fully uniformed and armed Altoona Police Officers. Another fully uniformed and armed Altoona Police Officer remained on the other side of the dining table. Numerous Officers (approximately 3-4), also blocked the path/route of travel from the dining area in which Defendant was seated, to the service area of the McDonalds. Numerous officers also prevented the Defendant from accessing the exit door from the McDonalds. An Agent from the Pennsylvania Attorney General's Office was also present.

26. A member of the Altoona Police Department questioned the Defendant about whether or not a backpack, plastic bag, and other items belonged to the Defendant. At that time, the Altoona Police Officer seized the items and packages and placed them in an area behind law enforcement personnel. At all times thereafter there remained Altoona Police Officers stationed between the

Defendant and the items of property believed to belong to the Defendant. These items of property remained in the control of the Altoona Police throughout. Defendant believes this action further supports his belief that he was not free to go.

27. In order for the Defendant to exit the dining table to venture to the service area of the McDonalds he would have had to pass no less than approximately seven (7) to ten (10) members of the Altoona Police Department and/or other law enforcement personnel. At this time, it is believed that there was in excess of ten (10) law enforcement personnel surrounding the Defendant in the small dining area. It again became abundantly clear that the Defendant's curtailment of liberty, seizure and unlawful detention and custody continued by this group of law enforcement personnel. No reasonable person would have believed that they were free to leave. The curtailment of Defendant's liberty and the detaining of the Defendant at this time was in violation in contravention of the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

28. During this period of custody, various members of the Altoona Police Department continued to interrogate the Defendant with the intentions of obtaining incriminating statements from the Defendant. The totality of the circumstances presented by the Altoona Police Department again make it clear that the Defendant was in custody and that the actions by the Altoona Police Department constituted a custodial interrogation of the Defendant. Both police officers from the Altoona Police Department continued to interrogate and question the Defendant, without

any reading of his *Miranda* Rights as required by the Constitution of the United States as well as the Pennsylvania Constitution. These questions were designed to potentially incriminate the Defendant.

29. In excess of (15) fifteen minutes had passed and the Defendant's unlawful detention, seizure, curtailment of liberty, custody, and interrogation continued. He still had not been given any information as to why he was being held. This continued curtailment of Defendant's liberty, seizure, unlawful detention, and custody of the Defendant was in violation and contravention of the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

30. The relevant police conduct exhibited at this time communicated to a reasonable person that he/she was not at liberty to ignore the police presence and go about his/her business. The actions by the Altoona Police Department and others sent a clear and strong signal to the Defendant – and any other reasonable person – that the officers will/would not allow him to leave while the inquiry is in progress.

31. Finally, after approximately (15) fifteen minutes of the defendant's unlawful detention, seizure, and continued custody, he was advised by Officer Detwiler that he was officially under a police investigation. He was not read his *Miranda* Rights at that time. Defendant was then asked who he was; at which time Defendant replied, that he was Luigi Mangione. He was further interrogated by members of the Altoona Police Department.

32. After approximately (2) two more minutes of interrogation a member

of the Altoona Police Department (Fox) read the Defendant his *Miranda* Rights. At the conclusion of the reading of said *Miranda* rights, the Defendant was asked if he wished to speak to police, at which time the Defendant shook his head no. Officer Fox immediately stated to the Defendant that "you are not in custody".

33. This statement was materially false, inaccurate, and contrary to law. It is clear at this time that the Defendant was in fact in custody; and had been in fact, in custody, since his illegal and unlawful seizure, detention, curtailment of liberty. Again, this unlawful seizure, detention, curtailment of liberty was in contravention of both the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

34. After the Defendant shook his head no (indicating he did not want to talk to the police) the Altoona Police Department continued to question and interrogate him anyway, he was then subjected to another *Terry* frisk. He was then placed in handcuffs and was informed that he was being detained. For reasons stated, *infra*, it is the Defendant's position that he has been illegally seized, detained, and in custody contrary to the protections provided by the both the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**. A photograph was then taken of him by an agent of the Pennsylvania Office of the Attorney General. Members of the Altoona Police Department continued to interrogate the Defendant despite indications by the Defendant that he did not wish to speak to law enforcement.

35. Approximately (7) seven minutes later, Defendant was physically removed from the McDonalds for, according to police reports, being placed under arrest (taken into custody) for the crime of "providing false identification to law enforcement", and transported to the Altoona Police Department. Said arrest was illegal and unlawful at this time, insofar as the Defendant did not commit the crime of False Identification to Law Enforcement Officer, in violation of **18 Pa.C.S. § 4914(a)**.

36. At the same time, members of the Altoona Police Department commenced a thorough search of Defendant's backpack and other items. Defendant avers that this search and seizure was illegal and unlawful, and in violation of the protections afforded by both the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

37. During the search of the backpack, the Altoona Police uncovered a clip wrapped up in underwear and other items. Contained within that backpack was a separate package secured by duct tape. Said package was opened via removal of the duct tape with a knife by a member of the Altoona Police Department without a valid search warrant. Said package contained a computer chip. Defendant avers that this search and seizure was illegal and unlawful, and in violation of the protections afforded by both the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

38. At the McDonalds, police also discovered a clip containing bullets

which was wrapped up in some undergarments. At that time, the Altoona Police Department decided to repack the backpack and take it to the Altoona Police Department for further searches and seizures.

39. At the Altoona Police Department, the Altoona Police continued to search the backpack, resulting in the seizure of numerous items, including but not limited to, the following:

- (a) 9mm handgun with printed lower receiver;
- (b) mechanized upper receiver;
- (c) suspected 3D printed suppressor;
- (d) red notebook (referred to and titled by a Police Officer as a "manifesto";
and multiple hand written notes;
- (e) a full list of seized items is hereby attached as "Exhibit B" here to.

40. Defendant avers that the search and seizure of items at the Altoona Police Department was in violation of protections afforded to the Defendant via the Defendant avers that this search and seizure was illegal and unlawful, and in violation of the protections afforded by the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**.

41. Insofar as the seizure of the Defendant and the search and seizure of the backpack and other packages was contrary to the protections afforded to the Defendant by the **Fourth Amendment** and the **Fourteenth Amendment** to the **United States Constitution** and under **Article 1, Section 8**, of the **Pennsylvania Constitution**, any and all items obtained from the Defendant on

December 9, 2024, and subsequent dates should be suppressed and the Commonwealth should be precluded from use of the same. This would include, but not be limited to:

- (a) the original identification card seized from the Defendant during the initial encounter by police;
- (b) any and all items listed in Defendant's "Exhibit B";
- (c) any other evidence purportedly belonging to or taken from Defendant.

WHEREFORE, Defendant moves, due to his illegal detention, to suppress all:

- (a) all statements made by Defendant;
- (b) all evidence seized as a result of the warrantless search of Defendant and his property; this includes but is not limited to the original identification card seized by the Altoona Police;
- (c) and, any and all other evidence, that has been seized as the fruit of the poisonous tree.

Motion to Supplement and/or to Amend

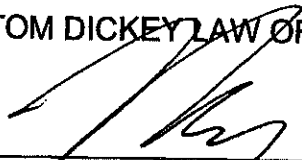
42. Pending receipt of disclosures and discovery pursuant to *Pa.R.Crim.P. 573(B)* and *Pa.R.Crim.P. 573(E)*, as hereinabove requested, and/or as otherwise obtained, the Defendant reserves the right to supplement and/or to amend this Omnibus Pretrial Motion for Relief and to move for leave to supplement and/or to amend.

WHEREFORE, the Defendant gives notice of the reservation of the right to supplement and/or to amend this Omnibus Pretrial Motion for Relief and to move for leave to supplement and/or to amend, and the Defendant will so move as grounds therefore may from time to time appear.

FURTHER, pursuant to *Pa.R.Crim.P. 575(A)(2)(e)*, hearing, if the averments hereof are denied by the Commonwealth, and argument on this omnibus motion are hereby requested;

AND, for purposes of *Pa.R.Crim.P. 575(A)(2)(f)*, it is certified that, concurrently with filing, a true and correct copy of this motion has been served upon the attorney for the Commonwealth, Peter Weeks, Esquire, District Attorney of Blair County, 423 Allegheny Street, Suite 421, Hollidaysburg, PA 16648 (814-693-3010), and on the Court Administrator, 423 Allegheny Street, Suite 239, Hollidaysburg, PA 16648 (814-693-3050), which service satisfied the requirements of *Pa.R.Crim.P. 576(B)*.

TOM DICKEY LAW OFFICES, P.C.



Thomas M. Dickey, Esquire

ATTORNEY FOR DEFENDANT

Magisterial District Judge 24-1-02

DOCKET

Docket Number: MJ-24102-CR-0000623-2024

Criminal Docket



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CASE INFORMATION

<u>Judge Assigned:</u>	Magisterial District Judge Benjamin F. Jones	<u>Issue Date:</u>	12/09/2024
<u>OTN:</u>	F 1009165-3	<u>File Date:</u>	12/09/2024
<u>Arresting Agency:</u>	Altoona Police Dept	<u>Arrest Date:</u>	12/09/2024
<u>Complaint No.:</u>	2024-29133	<u>Incident No.:</u>	2024-29133
<u>Disposition:</u>	Waived for Court	<u>Disposition Date:</u>	12/19/2024
<u>County:</u>	Blair	<u>Township:</u>	Altoona City
<u>Case Status:</u>	Closed		

STATUS INFORMATION

<u>Case Status</u>	<u>Status Date</u>	<u>Processing Status</u>
Closed	12/31/2024	Case Transferred to Court of Common Pleas
	12/19/2024	Completed
	12/09/2024	Awaiting Preliminary Hearing
	12/09/2024	Awaiting Preliminary Arraignment

CALENDAR EVENTS

<u>Case Calendar</u>	<u>Schedule</u>			<u>Judge Name</u>	<u>Schedule Status</u>
<u>Event Type</u>	<u>Start Date</u>	<u>Start Time</u>	<u>Room</u>		
Preliminary Arraignment	12/09/2024	6:30 pm		Magisterial District Judge Benjamin F. Jones	Scheduled
Preliminary Hearing	12/19/2024	8:30 am	Blair County Courthouse	Magisterial District Judge Benjamin F. Jones	Scheduled
Preliminary Hearing	12/23/2024	9:00 am	Blair County Courthouse	Magisterial District Judge Benjamin F. Jones	Moved
Formal Arraignment	01/24/2025	8:30 am			Scheduled

CONFINEMENT

<u>Confinement Location</u>	<u>Confinement Type</u>	<u>Confinement Reason</u>	<u>Confinement Date</u>	<u>Confinement End Date</u>
Case Confinement Blair County Prison	County Jail	Bail Denied	12/09/2024	



Magisterial District Judge 24-1-02

DOCKET

Docket Number: MJ-24102-CR-0000623-2024

Criminal Docket



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DEFENDANT INFORMATION

Name: Mangione, Luigi Nicholas **Sex:** Male
Date of Birth: 05/06/1998 **Race:** White
Address(es):
Home
Honolulu, HI 96813

Advised of His Right to Apply for Assignment of Counsel? Yes
Public Defender Requested by the Defendant? Yes
Application Provided for Appointment of Public Defender? Yes
Has the Defendant Been Fingerprinted? No

CASE PARTICIPANTS

<u>Participant Type</u>	<u>Participant Name</u>
Arresting Officer	Frye, Tyler S.
Defendant	Mangione, Luigi Nicholas

BAIL

Bail Set: **Nebbia Status: None**

<u>Bail Action Type</u>	<u>Bail Action Date</u>	<u>Bail Type</u>	<u>Originating Court</u>	<u>Percentage</u>	<u>Amount</u>
Denied	12/09/2024		Magisterial District Court		\$0.00

Bail Action Reason: No combination of conditions can ensure community safety. Homicide warrant forthcoming

CHARGES

<u># Charge</u>	<u>Grade</u>	<u>Description</u>	<u>Offense Dt.</u>	<u>Disposition</u>
1 18 § 4101 §§ A3	F2	Forgery - Utters Forged Writing	12/09/2024	Waived for Court
2 18 § 6106 §§ A1	F3	Firearms Not To Be Carried W/O License	12/09/2024	Waived for Court
3 18 § 4104 §§ A	M1	Tamper Records Or Id-Writing	12/09/2024	Waived for Court
4 18 § 907 §§ A	M1	Poss Instrument Of Crime W/int	12/09/2024	Waived for Court
5 18 § 4914 §§ A	M3	False Identification To Law Enforcement Officer	12/09/2024	Waived for Court

DISPOSITION / SENTENCING DETAILS

<u>Case Disposition</u>	<u>Disposition Date</u>	<u>Was Defendant Present?</u>
Waived for Court	12/19/2024	Yes
<u>Offense Seq./Description</u>	<u>Offense Disposition</u>	
1 Forgery - Utters Forged Writing	Waived for Court	
2 Firearms Not To Be Carried W/O License	Waived for Court	
3 Tamper Records Or Id-Writing	Waived for Court	
4 Poss Instrument Of Crime W/int	Waived for Court	
5 False Identification To Law Enforcement Officer	Waived for Court	

Magisterial District Judge 24-1-02

DOCKET

Docket Number: MJ-24102-CR-0000623-2024

Criminal Docket



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ATTORNEY INFORMATION

District Attorney

Name: Blair County District Attorney's Office
Representing: Commonwealth of Pennsylvania
Counsel Status: Active
Supreme Court No.:
Phone No.: 814-693-3010

Address: Blair County Courthouse
Suite 421
423 Allegheny Street
Hollidaysburg, PA 16648

Private

Name: Thomas M. Dickey, Esq.
Representing: Mangione, Luigi Nicholas
Counsel Status: Active
Supreme Court No.: 041475
Phone No.: 814-942-7544

Address: Dickey Law Offices
308 Orchard Avenue
Altoona, PA 16602-4066

DOCKET ENTRY INFORMATION

<u>Filed Date</u>	<u>Entry</u>	<u>Filer</u>	<u>Applies To</u>
12/19/2024	Notice of Intent to Waive Formal Arraignment at Common Pleas	Luigi Nicholas Mangione	Luigi Nicholas Mangione, Defendant
12/19/2024	Preliminary Hearing Waived Pursuant to Agreement - Rule 541(A)	Luigi Nicholas Mangione	Luigi Nicholas Mangione, Defendant
12/19/2024	Waived for Court	Magisterial District Judge Benjamin F. Jones	Luigi Nicholas Mangione, Defendant
12/19/2024	Docket Transcript Printed	Magisterial District Court 24-1-02	Luigi Nicholas Mangione, Defendant
12/09/2024	Fingerprint Order Issued	Magisterial District Court 24-1-02	Luigi Nicholas Mangione, Defendant
12/09/2024	Commitment Printed - Bail Denied	Magisterial District Court 24-1-02	Luigi Nicholas Mangione, Defendant
12/09/2024	Criminal Complaint Filed	Magisterial District Court 24-1-02	Luigi Nicholas Mangione, Defendant

Commonwealth of Pennsylvania



RECEIPT / INVENTORY OF SEIZED PROPERTY

COUNTY OF Blair

Docket Number (Issuing Authority): Police Incident Number: 2024-29133 Warrant Control Number:

Date of Search: 12-9-2024 Time of Search: 1827 Inventory Page Number: 1 of 7 Pages

Det Heuston Altoona Police Dept 300

Affiant Agency or Address if private affiant Badge No. The following property was taken / seized and a copy of this Receipt / Inventory with a copy of the Search Warrant and affidavit(s) (if not sealed) was personally served on (name of person) Luigi Mangione was left at (describe the location)

Item Number	Quantity	Item Description	Make, Model, Serial No., Color, etc.
1	1	Red notebook manifests & multiple handwritten notes	
2	1	9mm black Ghost handgun	
3	1	US passport / maryland \$0 / 3 cards debit/credit for Luigi Mangione	
4	1	Handmade 3D printed silencer	
5	1	1 9mm magazine w/ 12 rounds 3 hollow point	
6	1	US currency \$7,807	
7	1	Foreign currency \$1,620	
8	1	AAA batteries / wind load phones / 32 GB sand disc	
9	1	Polaroid digital camera / mini harddrive / USB	
10	1	Medical mask / watch / pen / rope / flashlight / 62 cents	
11	1	USB from wallet	
12	1	USB on necklace	
13	1	CVS receipt	
14	1	USB x2 / mini sim card	
15	1	pocket knife / screw driver / buggies & zip ties	
16	1	Best buy receipt	
17	1	Gift for Gray hand bus ticket Philly to Pitt	
18	1	fake NJ DL / quick trip ticket / visa gift card / 2 hand written notes	
19	1	Medical face mask 25 count	
20	1	hand written note from backpack	
21	1	iphone no sim card	
22	1	mac book pro laptop	
23	1	black jacket	
24	1	Green jacket / Brown beanie / 1 black gloves / black belt / black	

I/we do hereby state that this inventory is to the best of my/our knowledge and belief a true and correct listing of all items seized, and that I/we sign this Receipt / Inventory subject to the penalties and provisions of Title 18 Pa.C.S. 4904(b)-Unsworn Falsification to Authorities.

Signature of person issuing Receipt / Inventory: Det Heuston Affiliation: APD Badge or Title: 300
 Signature of Witness: Det Featherstone Affiliation: APD Badge or Title: 323
 Signature of person making Search: Det Oscar Diaz Affiliation: NYPD Badge or Title: 4656

Commonwealth of Pennsylvania



RECEIPT / INVENTORY OF SEIZED PROPERTY

COUNTY OF Blair

Docket Number (Issuing Authority): Police Incident Number: 7024-29133 Warrant Control Number:

Date of Search: 12-9-2024 Time of Search: 1827 Inventory Page Number: 7 of 7 Pages

Det Heuston Altoona Police Dept 300

The following property was taken, / seized and a copy of this Receipt / Inventory with a copy of the Search Warrant and affidavit(s) (if not sealed) was personally served on (name of person) Luigi Mangione was left at (describe the location)

Item Number	Quantity	Item Description	Make, Model, Serial No., Color, etc.
24	1	underwear leggings	
25	1	black backpack w/ clothing / hair clippers / food wrappers wireless earphones	
26	1	black slurs	
27	1	black jeans / black neck guard	
<i>Further</i>			

I/we do hereby state that this inventory is to the best of my/our knowledge and belief a true and correct listing of all items seized, and that I/we sign this Receipt / Inventory subject to the penalties and provisions of Title 18 Pa.C.S. 4904(b) - Unsworn Falsification to Authorities.

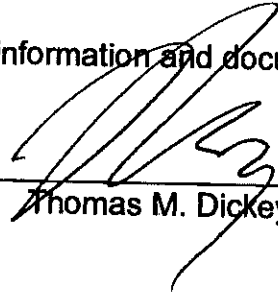
Signature of person Issuing Receipt / Inventory: Sgt Heuston Printed Name: Sgt Heuston Affiliation: APD Badge or Title: 300

Signature of Witness: [Signature] Printed Name: Det Frederick Affiliation: APD Badge or Title: 323

Signature of person making Search: [Signature] Printed Name: DET OSCAR DIAZ Affiliation: NYPD Badge or Title: 4656

PUBLIC ACCESS POLICY CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



Thomas M. Dickey, Esquire

**IN THE COURT OF COMMON PLEAS OF BLAIR COUNTY, PENNSYLVANIA
CRIMINAL DIVISION**

COMMONWEALTH OF PENNSYLVANIA

v.

LUIGI NICHOLAS MANGIONE

:
: NO. CP-07-CR-0002724-2024
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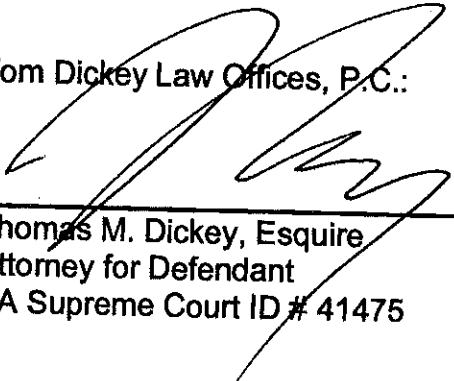
CERTIFICATE OF MAILING

I, Thomas M. Dickey, hereby certify that on this date, a true and correct copy of the foregoing Omnibus Pretrial Motion for Relief was hand delivered to the following parties:

Peter J. Weeks, Esquire
District Attorney
Blair County Courthouse
423 Allegheny Street
Hollidaysburg, PA 16648

The Honorable Jackie A. Bernard
Blair County Courthouse
423 Allegheny Street
Hollidaysburg, PA 16648

Tom Dickey Law Offices, P.C.:



Thomas M. Dickey, Esquire
Attorney for Defendant
PA Supreme Court ID # 41475