

COMMONWEALTH OF PENNSYLVANIA : IN THE COURT OF COMMON PLEAS
: :
: :
V. : CENTRE COUNTY, PENNSYLVANIA
: CRIMINAL DIVISION
: :
GERALD SANDUSKY : NO. CP-14-CR-2421-2011

FILED FOR RECORD
MAY 18 P 4:51
CLERK OF COURT

AMENDED INFORMATION

The Attorney General of the Commonwealth of Pennsylvania, by this Information, charges that on diverse dates as described herein, at Defendant's residence at 130 Grandview Road in College Township (hereinafter referred to as "Defendant's home"), Centre County, Pennsylvania, and various other locations the above-named Defendant did commit the following offenses:

COUNT 1: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 9, who was less than sixteen years of age when the Defendant was four or more years older than Victim 9 and not married to Victim 9. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between July 2005 and December 2008 at Defendant's home, engage in involuntary deviate sexual intercourse on numerous occasions with juvenile Victim 9 by performing oral and anal sex and on juvenile Victim 9.

COUNT 2: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 9, who was less than sixteen years of age when the Defendant was four or more years older than Victim 9 and not married to Victim 9. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between July 2005 and December 2008 at Defendant's home, engage in involuntary deviate sexual intercourse with juvenile Victim 9 by compelling juvenile Victim 9 on numerous occasions to perform oral sex upon him.

COUNT 3: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(7) – (F-3)

The Defendant did have indecent contact with Victim 9 and/or cause Victim 9 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 9 and the victim is less than thirteen years of age and the Defendant and Victim 9 were not married. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between July 2005 and December 2008 at Defendant's home, the Hilton Garden Inn on East College Avenue in State College and elsewhere, have indecent contact with Juvenile Victim 9 who was less than thirteen years of age and the Defendant and Victim 9 were not married.

COUNT 4: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-1)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between July 2005 and December 2008 at Defendant's home, the Hilton Garden Inn on East College Avenue in State College and elsewhere, have contact with a minor, juvenile Victim 9, for the purpose of engaging in sexual offenses as set forth in Counts 1-3.

COUNT 5: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did on various dates between July 2005 and December 2008 at Defendant's home, the Hilton Garden Inn on East College Avenue in State College and elsewhere, corrupt the morals of a minor, by engaging in a course of sexual conduct with juvenile Victim 9.

COUNT 6: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between July 2005 and December 2008 at Defendant's home, the Hilton Garden Inn on East College Avenue in State College and elsewhere, endanger the welfare of Victim 9 by engaging in a course of sexual conduct with Victim 9.

COUNT 7: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 10, who was less than sixteen years of age when the Defendant was four or more years older than Victim 10 and not married to Victim 10. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between September 1997 and July 1999 at Defendant's home, engage in involuntary deviate sexual intercourse on numerous occasions with juvenile Victim 10 by performing oral sex on juvenile Victim 10.

COUNT 8: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 10, who was less than sixteen years of age when the Defendant was four or more years older than Victim 10 and not married to Victim 10. To Wit: The Defendant, Gerald A. Sandusky, did, on various dates between September 1997 and July 1999 at Defendant's home, engage in involuntary deviate sexual intercourse with juvenile Victim 10 by compelling juvenile Victim 10 on numerous occasions to perform oral sex upon him.

COUNT 9: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(7) – (M-1)

The Defendant did have indecent contact with Victim 10 and/or cause Victim 10 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 10, the victim is less than thirteen years of age and the Defendant and Victim 10 were not married. To Wit: The Defendant, Gerald A. Sandusky, did, on various dates between September 1997 and July 1999 at Defendant's home and elsewhere, have indecent contact with Juvenile Victim 10 who was less than thirteen years of age and the Defendant and Victim 10 were not married.

COUNT 10 UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-1)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 10, on various dates between September 1997 and July 1999 at Defendant's home and elsewhere, for the purpose of engaging in sexual offenses as set forth in Counts 7-10.

COUNT 11: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of any minor less than eighteen years of age or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did on various dates between September 1997 and July 1999 at Defendant's home and elsewhere, corrupt the morals of a minor, by engaging in a course of sexual conduct with juvenile Victim 10.

COUNT 12: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did on various dates between September 1997 and July 1999 at Defendant's home and elsewhere, endanger the welfare of Victim 10 by engaging in a course of sexual conduct with Victim 10.

ALL OF WHICH is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

LINDA L. KELLY
Attorney General

BY:



FRANK G. FINA
Chief Deputy Attorney General
Criminal Prosecutions Section