



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA  
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA )

vs. )

GERALD A. SANDUSKY )

Nos. CP-14-CR-2421-2011 &  
CP-14-CR-2422-2011

*Commonwealth Attorneys:*

*Joseph McGettigan, Esquire*

*Jonelle H. Eshbach, Esquire*

*Defense Attorney:*

*Joseph L. Amendola, Esquire*

**APPLICATION FOR ORDER FOR BILL OF PARTICULARS**

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE SPECIALLY ASSIGNED  
TO THIS MATTER IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY,  
PENNSYLVANIA:

AND NOW, comes the Defendant, GERALD A. SANDUSKY, through his  
attorney, Joseph L. Amendola, Esquire, who, pursuant to Pa. R. Crim. P. 572, applies to  
the Court for a Bill of Particulars. As grounds for such application, the Defendant states:


1. That on or about January 18, 2012, the Defendant served on the  
Office of Attorney General a Request for Bill of Particulars, and, on that day, he also filed  
a Request for Bill of Particulars. A copy of the Request for Bill of Particulars is attached  
hereto and incorporated herein as Exhibit "A".

2. That more than seven (7) days have elapsed since the service and  
filing of the Defendant's Request for Bill of Particulars and the Office of Attorney General  
has not furnished those Particulars as required by Pa. R. Crim. P. 572(c).

3. For all the aforementioned reasons, the Defendant respectfully  
requests that this Court order the Office of Attorney General to provide the requested Bill  
of Particulars.

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter an Order requesting that the Office of Attorney General provide the requested Bill of Particulars.

Respectfully submitted,

BY:   
Joseph L. Amendola, Esquire  
Attorney for Defendant  
110 Regent Court, Suite 202  
State College, PA 16801  
(814) 234-6821  
I.D. No. 17667

Date: January 24, 2012

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA  
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA	)	
	)	
VS.	)	Nos. CP-14-CR-2421-2011 &
	)	CP-14-CR-2422-2011
GERALD A. SANDUSKY	)	

**REQUEST FOR BILL OF PARTICULARS**

TO THE PENNSYLVANIA OFFICE OF ATTORNEY GENERAL:

Pursuant to Pennsylvania Rule of Criminal Procedure 572(A), please provide the Defendant with the following information:

**I. Criminal Information No. CP-14-CR-2421-2011**

A. In regard to Count 1, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 9 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 9 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

B. In regard to Count 2, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 9 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 9 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

C. In regard to Count 3, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(7) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 9 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 9 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

D. In regard to Count 4, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 9 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 9 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

E. In regard to Count 5, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 9 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 9 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

F. In regard to Count 6, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 9 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 9 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

G. In regard to Count 7, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 10 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 10 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

H. In regard to Count 8, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed

against the Defendant.

(3) The exact age of the accuser/alleged Victim 10 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 10 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

I. In regard to Count 9, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(7) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 10 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 10 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

J. In regard to Count 10, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 10 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 10 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

K. In regard to Count 11, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the

offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 10 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 10 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

L. In regard to Count 12, Endangering the Welfare of Children – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 10 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 10 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

## **II. Criminal Information No. CP-14-CR-2422-2011**

A. In regard to Count 1, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 1 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 1 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

B. In regard to Count 2, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 1 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 1 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

C. In regard to Count 3, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(8) – (M-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 1 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 1 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

D. In regard to Count 4, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 1 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 1 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

E. In regard to Count 5, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:



(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 1 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 1 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

F. In regard to Count 6, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 1 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 1 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

G. In regard to Count 7, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 2 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 2 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

H. In regard to Count 8, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(8) – (M-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 2 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 2 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

I. In regard to Count 9, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 2 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 2 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

J. In regard to Count 10, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 2 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 2 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

K. In regard to Count 11, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 2 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 2 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

L. In regard to Count 12, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(8) – (M-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 3 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 3 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

M. In regard to Count 13, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 3 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 3 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

N. In regard to Count 14, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 3 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 3 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

O. In regard to Count 15, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 3 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 3 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

P. In regard to Count 16, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

Q. In regard to Count 17, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

R. In regard to Count 18, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

S. In regard to Count 19, Aggravated Indecent Assault in violation of 18 Pa. C.S.A. Section 3125(a)(8) – (F-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed

against the Defendant in this matter.

T. In regard to Count 20, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(8) – (M-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

U. In regard to Count 21, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

V. In regard to Count 22, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

W. In regard to Count 23, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 4 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 4 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

X. In regard to Count 24, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(7) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 5 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 5 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

Y. In regard to Count 25, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 5 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 5 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

Z. In regard to Count 26, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 5 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 5 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

AA. In regard to Count 27, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 5 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 5 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

BB. In regard to Count 28, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(7) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed



against the Defendant.

(3) The exact age of the accuser/alleged Victim 6 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 6 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

CC. In regard to Count 29, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 6 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 6 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

DD. In regard to Count 30, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 6 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 6 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

EE. In regard to Count 31, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the

offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 6 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 6 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

FF. In regard to Count 32, Criminal Attempt to Commit Indecent Assault in violation of 18 Pa. C.S.A. Section 901/3126(a)(8) – (M-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 7 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 7 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

GG. In regard to Count 33, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-3) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 7 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 7 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

HH. In regard to Count 34, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 7 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 7 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

II. In regard to Count 35, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 7 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 7 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

JJ. In regard to Count 36, Involuntary Deviate Sexual Intercourse in violation of 18 Pa. C.S.A. Section 3123(a)(7) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 8 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 8 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

KK. In regard to Count 37, Indecent Assault in violation of 18 Pa. C.S.A. Section 3126(a)(7) – (M-2) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 8 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 8 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

LL. In regard to Count 38, Unlawful Contact with Minors in violation of 18 Pa. C.S.A. Section 6318(a)(1) – (F-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 8 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 8 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

MM. In regard to Count 39, Corruption of Minors in violation of 18 Pa. C.S.A. Section 6301(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 8 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 8 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

NN. In regard to Count 40, Endangering the Welfare of Children in violation of 18 Pa. C.S.A. Section 4304(a)(1) – (M-1) of the Information filed in this matter:

(1) The exact time, date and location that the offense giving rise to this Count in the Information filed against the Defendant occurred.

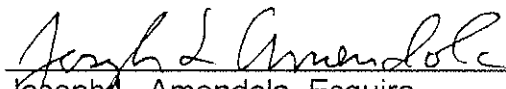
(2) The particular acts of the Defendant and other alleged facts and exact location which the Commonwealth alleges provide the underlying basis for the offense with which the Defendant is charged in this Count of the Information filed against the Defendant.

(3) The exact age of the accuser/alleged Victim 8 at the time the alleged offense occurred.

(4) The names, addresses and dates of birth of all witnesses including the accuser/alleged Victim 8 to the offense alleged in this Count of the Information filed against the Defendant in this matter.

Without such particulars, the Defendant cannot ascertain if he has an alibi offense to these charges, or whether he has a defense based upon the applicable statute of limitations, and cannot otherwise properly and adequately prepare his defense for trial.

Respectfully submitted,

By:   
Joseph L. Amendola, Esquire  
110 Regent Court, Suite 202  
State College, PA 16801  
(814) 234-6821  
I.D. 17667

Date: January 18, 2012

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA  
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA	)	
	)	
VS.	)	Nos. CP-14-CR-2421-2011 &
	)	CP-14-CR-2422-2011
GERALD A. SANDUSKY	)	

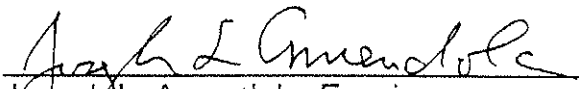
CERTIFICATE OF SERVICE

AND NOW, this 18<sup>th</sup> day of January, 2012, I, Joseph L. Amendola, Esquire, hereby certify that I have this date, served a copy of the foregoing document, by causing same to be mailed by U.S. mail, first class, postage prepaid, to:

Hon. John M. Cleland, Senior Judge  
c/o Ms. Maxine Ishler, Court Administrator  
Centre County Courthouse  
102 South Allegheny Street  
Bellefonte, Pennsylvania 16823

Joseph McGettigan, Esquire  
Deputy Attorney General  
Office of Attorney General  
Criminal Prosecutions Section  
100 Madison Avenue, Suite 310  
Norristown, PA 19403

Jonelle H. Eshbach, Esquire  
Senior Deputy Attorney General  
Office of Attorney General  
Criminal Prosecutions Section  
16<sup>th</sup> Floor Strawberry Square  
Harrisburg, PA 17120

BY:   
Joseph L. Amendola, Esquire  
Attorney for Defendant  
110 Regent Court, Suite 202  
State College, PA 16801  
(814) 234-6821  
I.D. No. 17667

### VERIFICATION

I verify that the statements made in the foregoing are true and correct. I understand that false statements are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
Joseph L. Amendola, Esquire

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA  
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA )

vs. )

GERALD A. SANDUSKY )

Nos. CP-14-CR-2421-2011 &  
CP-14-CR-2422-2011

*Commonwealth Attorneys:*

*Joseph McGettigan, Esquire*

*Jonelle H. Eshbach, Esquire*

*Defense Attorney:*

*Joseph L. Amendola, Esquire*

**CERTIFICATE OF SERVICE**

AND NOW, this 24<sup>th</sup> day of January, 2012, I, Joseph L. Amendola, hereby certify that I have, this date, served a copy of the foregoing document, by causing same to be mailed by United States mail, postage prepaid, to:

Hon. John M. Cleland, Senior Judge  
c/o Ms. Maxine Ishler, Court Administrator  
Centre County Courthouse  
102 South Allegheny Street  
Bellefonte, Pennsylvania 16823

Joseph McGettigan, Esquire  
Deputy Attorney General  
Office of Attorney General  
Criminal Prosecutions Section  
100 Madison Avenue, Suite 310  
Norristown, PA 19403

Jonelle H. Eshbach, Esquire  
Senior Deputy Attorney General  
Office of Attorney General  
Criminal Prosecutions Section  
16<sup>th</sup> Floor Strawberry Square  
Harrisburg, PA 17120

BY:



Joseph L. Amendola, Esquire  
Attorney for Defendant  
110 Regent Court, Suite 202  
State College, PA 16801  
(814) 234-6821  
I.D. No. 17667