

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

COMMONWEALTH OF PENNSYLVANIA : No. CP-14-CR-2421-2011;  
: CP-14-CR-2422-2011  
vs. :  
: :  
GERALD A. SANDUSKY :

FILED FOR RECORD  
2012 MAR -1 A 9:28  
DEBRA C. IMMEL  
PROTHONOTARY  
CENTRE COUNTY, PA

**BILL OF PARTICULARS**

AND NOW, Feb. 21, 2012, the Commonwealth of Pennsylvania, by Linda Kelly, Attorney General for the Commonwealth of Pennsylvania, Frank G. Fina, Chief Deputy Attorney General, and Jonelle H. Eshbach, Senior Deputy Attorney General, respectfully files the following Bill of Particulars pursuant to the Trial Court's Order of February 13, 2012. All information is provided to the best of the Commonwealth's knowledge, information and belief.

**VICTIM 1**

- a. The offenses occurred between 2005-2008. Exact dates are unknown. The location of the offenses is the Defendant's residence, 130 Grandview Road, State College, Pennsylvania, 16801; crimes also occurred at a State College hotel near Sandusky's residence, and at the school attended by Victim 1.
- b. The exact age of the Victim 1 spans ages 11 through 15.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact times and dates.

**VICTIM 2**

- a. The date of this offense is March 1, 2002, in the evening, at the Lasch football building on the University Park Campus of the Penn State University.
- b. The exact age of Victim 2 is unknown.
- c. The identity of Victim 2 is unknown, therefore, the exact age of Victim 2 is unknown.

### VICTIM 3

- a. The offenses occurred between the summer of 2000 and late 2002. Exact dates are unknown. Locations of the offenses include Sandusky's residence and the Lasch Building showers on the University Park campus of the Penn State University.
- b. The exact age of Victim 3 spans ages 13 through 15.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the offenses, is unable to provide exact times and dates.

### VICTIM 4

- a. The offenses occurred between 1996 and 2000. Exact dates are unknown. The offenses occurred at Sandusky's residence; in showers at the East Area Locker Rooms across from Holuba Hall; at the hotel at Toftrees Golf Resort; in the states of Florida in December 1998 through January 1999 and Texas in December 1999, in the Lasch football building and various dormitories of the Pennsylvania State University, University Park campus.
- b. The exact age of Victim 4 spans ages 12 through 17.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the offenses, is unable to provide exact times and dates.

### VICTIM 5

- a. The offenses occurred between fall of 1996 and 2002. Location of the offenses were the locker rooms and showers of the East Area Locker Rooms on the University Park campus of the Pennsylvania State University.
- b. The exact age of Victim 5 spans ages 8 to 12 years old.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the offenses, is unable to provide exact times and dates.

### VICTIM 6

- a. The offense was committed on May 3, 1998 between 7 o'clock p.m. and 9 o'clock p.m. at the locker/shower room of Lasch building.
- b. The exact age of Victim 6 is 11 years old.
- c. Not applicable.

### VICTIM 7

- a. The offenses occurred between approximately 1996 and 1999. The offenses occurred at Sandusky's residence and in the East Area Locker Rooms on the University Park campus of Penn State.
- b. The exact age of Victim 7 is 11 to 14 years of age.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact times and dates.

### VICTIM 8

- a. The offenses occurred on a Thursday or Friday evening in November of 2000. The offenses occurred in the assistant coach's locker room of the Lasch Building, University Park campus.
- b. Exact age of the Victim 8 is unknown; eyewitness places victim's age at between 11 and 13 years.
- c. The Commonwealth is unable to provide the exact age of the alleged victim because the identity of the alleged victim is unknown.

### VICTIM 9

- a. The offenses occurred between summer 2005 and 2009. The offenses occurred at Sandusky's residence and at the pool and fitness center of the Hilton Garden Inn on East College Avenue in State College, Pennsylvania.
- b. The exact age of Victim 9 spans age 13 to 15/16.

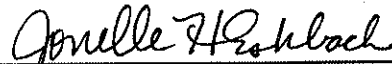
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact dates and times.

**VICTIM 10**

- a. The offenses occurred between summer 1997 and 1999. The offenses occurred at Sandusky's residence, the outdoor pool at University Park and in Sandusky's car.
- b. The exact age of Victim 10 spans ages 10 to 12.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact dates and times.

**Respectfully Submitted,**

**LINDA KELLY  
Attorney General**

By:   
**JONELLE H. ESHBACH  
Senior Deputy Attorney General  
Criminal Prosecutions Section  
OFFICE OF ATTORNEY GENERAL  
Criminal Prosecutions Section  
Strawberry Square, 16<sup>th</sup> Floor  
Harrisburg, PA 17120**

Date: Feb. 21, 2012

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CERTIFICATE OF SERVICE

I, Jonelle H. Eshbach, Senior Deputy Attorney General, Attorney for the Commonwealth,  
at Attorney General's Office, 16<sup>th</sup> Floor, Strawberry Square, Harrisburg, Pennsylvania, 17120,  
hereby certify that I served a true and correct copy of the Commonwealth's Answer to  
Defendant's Request for Bill of Particulars on:

Joseph L. Amendola, Esquire  
110 Regent Court  
Suite 202  
State College, PA 16801-7966

by first class mail, postage prepaid at Harrisburg, Pennsylvania on the date noted below.

I certify under penalty of perjury that the foregoing is true and correct.

Date: Feb . 21, 2012

BY: Jonelle H Eshbach  
JONELLE H. ESHBACH  
Senior Deputy Attorney General  
Attorney for the Commonwealth