

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

DEBRA C. IMMEL
PROTHONOTARY

COMMONWEALTH'S ANSWER TO DEFFENDANT'S REQUEST FOR BILL OF PARTICULARS

AND NOW, January 30, 2012, the Commonwealth of Pennsylvania, by its undersigned attorneys, Linda Kelly, Attorney General for the Commonwealth of Pennsylvania, Frank G. Fina, Chief Deputy Attorney General (Criminal Prosecutions Section), and Jonelle H. Eshbach, Senior Deputy Attorney General (Criminal Prosecutions Section), and respectfully files the following Answer to Defendant's Request for a Bill of Particulars and in support of that Answer states the following:

- 1. Criminal Information No. CP-14-CR-2421-2011
 - A.-F. The Commonwealth of Pennsylvania will provide the name of Victim 9. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
 - G.-L. The Commonwealth of Pennsylvania will provide the name of Victim 10. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- 2. Criminal Information No. CP-14-CR-2422-2011

- A.-F. The Commonwealth of Pennsylvania will provide the name of Victim 1. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- G.-K. The Commonwealth of Pennsylvania will provide the name of Victim 2. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- L.-O. The Commonwealth of Pennsylvania will provide the name of Victim 3. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- P.-W. The Commonwealth of Pennsylvania will provide the name of Victim 4. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- X.-AA. The Commonwealth of Pennsylvania will provide the name of Victim 5. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- BB.-EE. The Commonwealth of Pennsylvania will provide the name of Victim 6. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.

- FF.-II. The Commonwealth of Pennsylvania will provide the name of Victim 7. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.
- JJ.-NN. The Commonwealth of Pennsylvania will provide the name of Victim 8. Regarding all other information sought in the Bill of Particulars, it is respectfully requested that the Trial Court deny the request for Bill of Particulars for the reasons set forth in the accompanying Memorandum in Support of Commonwealth's Answer to Defendant's Request for Bill of Particulars.

The identities of Victims 1-10 will not be filed with this answer, but will be delivered by personal service to counsel for the Defendant by the close of business on February 3, 2012. The Commonwealth respectfully requests the Trial Court deny the request for Bill of Particulars as to all other information sought by Defendant.

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, 16th Floor Harrisburg, PA 17120

Date: January 30, 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, 16th 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: January 30, 2012

ONELLE H. ESHBACH

Senior Deputy Attorney General Attorney for the Commonwealth

DEBRA C. IMPIEL PROTHIONOTARY