



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

INFORMATION

The Attorney General of the Commonwealth of Pennsylvania, by this Information, charges that on or about January 1997 to December 2008, at College Township, 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 engage in involuntary deviate sexual intercourse with juvenile Victim 9 by performing oral sex 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 engage in involuntary deviate sexual intercourse with juvenile Victim 9 by compelling juvenile Victim 9 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 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 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 corrupt the morals of a minor, 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 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 engage in involuntary deviate sexual intercourse 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 engage in involuntary deviate sexual intercourse with juvenile Victim 10 by compelling juvenile Victim 10 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 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, 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 corrupt the morals of a minor, juvenile Victim 10.

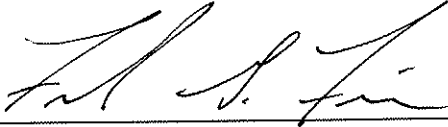
COUNT 12: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

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 endanger the welfare of Victim10 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



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June 17, 2011

Frank G. Fina
Chief Deputy Attorney General
Criminal Prosecutions Section
Office of Attorney General
16th Floor, Strawberry Square
Harrisburg, PA 17120

Dear Mr. Fina:

Pursuant to Sections 201(c) and 205(d) of the Commonwealth Attorneys Act, 71 P.S. §§ 732-201(c) and 732-205(d), and Section 8931(i) of the Judicial Code, 42 Pa. C.S. § 8931(i), you are hereby designated to act for the Attorney General of Pennsylvania and authorized to sign criminal informations on behalf of the Attorney General in all cases within the prosecutorial jurisdiction of the Attorney General.

A copy of this authorization should be filed with the appropriate Clerk of Court prior to the filing of informations.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Linda L. Kelly".

Linda L. Kelly
Attorney General

PLEA OF DEFENDANT

Defendant, being advised of the offense(s) charged in the Information and of _____ rights, hereby in open court enters a plea of _____.

Date Defendant Attorney for Defendant

WAIVER OF JURY TRIAL

Defendant, being advised of the offense(s) charged in the Information and of _____ rights, hereby in open court pleads not guilty and, with the consent of _____ attorney and the approval of the judge, waives a jury trial and elects to be tried by a judge without a jury.

Date Defendant Attorney for Defendant

WAIVER OF ARRAIGNMENT

Defendant, being advised of the offense(s) charged in the Information and of _____ rights, hereby in open court consents to proceed on the Information charged by the attorney for the Commonwealth and waives formal arraignment as provided by the Pennsylvania Rules of Criminal Procedure.

Date Defendant Attorney for Defendant

CHANGE OF PLEA

Defendant, being advised of the offense(s) charged in the Information and of _____ rights, hereby in open court changes _____ plea of _____.

Date Defendant Attorney for Defendant