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April 4, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Sixteenth Supplemental Discovery Request
Based Upon Known Incarcerations of Specific
Accusers/Alleged Victims within the Commonwealth of
Pennsylvania**

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a sixteenth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

123. All records obtained by the Office of Attorney General/Commonwealth of Pennsylvania or the Pennsylvania State Police by subpoena/search warrant regarding incarceration records from any and all federal, state, county or local jails and/or detention centers within the Commonwealth of Pennsylvania as well as any location outside the Commonwealth of Pennsylvania for the known Accusers/Alleged Victims.

124. Specific records obtained by the Office of Attorney General/Commonwealth of Pennsylvania or the Pennsylvania State Police that depict any and all records that the known Accuser/Alleged Victim 10 was incarcerated within the Clearfield County Jail as well as any and all records from the Pennsylvania Department of Corrections for this individual's period of confinement within the state prison system to include:

a. All records from the Clearfield County Jail that pertain to psychological/psychiatric and medical evaluations performed by

an in-house medical provider or contracted vendor who performs such functions;

b. All disciplinary records from the Clearfield County Jail;

c. All records from the Pennsylvania Department of Corrections that relate to this individual to include all court documents related to a transport order from Clearfield County Jail to SCI-Albion for initial classification/testing at SCI-Albion and all initial classification records from SCI-Albion to include but not limited to the following:

1) all initial testing for IQ/psychological and psychiatric testing as completed by SCI-Albion personnel tasked to the inmate's initial introduction incarceration procedure;

2) All block cards, all misconducts, and inmate files (DC-15) as well as the notes within the DC-14 counselor files and/or any other Department of Corrections records, files, reports, or documents regardless of being identified within this supplemental discovery request that were provided by the Department of Corrections within the compliance of a subpoena/search warrant;

3) All Department of Correction documents identifying the SCI location within the Commonwealth of Pennsylvania that this individual was placed upon completion of his initial time within the Department of Corrections at SCI-Albion.

d. All records not described within this Request No. 124 that were obtained through use of a subpoena/search warrant.

125. All the same records, files, documents, etc. as requested above involving the other known Accusers/Alleged Victims.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be

made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

A handwritten signature in cursive script, appearing to read "Joe", written in dark ink.

Joseph L. Amendola, Esquire

JLA:dka

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Seventeenth Supplemental Discovery Request
Based Upon the Commonwealth's Accusers/Alleged Victims
Background Records Check for Liens/Judgments and/or Other
Financial Related Documents for Accusers/Alleged Victims 1,
3, 4, 5, 6, 7, 9 and 10**

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a seventeenth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

126. Any and all records that pertain to the Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 that relate to the following areas:

a. All credit files as obtained from the three (3) major credit reporting agencies that provide such services within the United States;

b. All records, files, reports, documents and related search information based upon review of the information obtained from subsection a above through use of a search warrant/subpoena or provided to the Office of Attorney General/Pennsylvania State Police by voluntary means;

c. All Office of Attorney General/Pennsylvania State Police incident reports and supplemental reports that were prepared based upon information obtained from the Clearfield County Jail, the Pennsylvania Department of Corrections and facts obtained from a search of the credit bureau records.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Eighteenth Supplemental Discovery Request
Based Upon Potential Inter-Agency/Cross-Agency by the
Commonwealth, Office of Attorney General or Pennsylvania
State Police with Offices of the Attorney General or the
Pennsylvania State Police or any Other Federal, State, Local,
Sheriff and/or County Within the Commonwealth or Non-
Commonwealth Law Enforcement Agency who Provided
Investigative Assistance in this matter.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a eighteenth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

127. Reports including supplemental reports, investigation files, records, correspondence, education/training materials, training and education of investigators that relate to the following law enforcement agencies:

a. Federal Bureau of Investigation (FBI), the Office of Attorney General Bureau of Child Abuse and Exploitations, the United States Postal Inspectors Office on Child Abuse, as well as any other agency not described above as well as any and all agencies outside the Commonwealth and agencies within the

Commonwealth who provided investigative assistance into this investigation;

b. Related documents that were sent to the Federal Bureau of Investigation (FBI) for review and consultation from the Behavior Science Unit located at the FBI Training Academy at Quantico, Virginia;

c. The same request for all information forwarded to any and all agency not described above by name.

128. All investigative reports, supplemental reports, documents that detail investigative measures to be completed by the Office of Attorney General or Pennsylvania State Police that in any way relate to this investigation.

129. All forensic interview(s) of Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 that were completed by the Federal Bureau of Investigation's Behavioral Sciences Unit, the Office of Attorney General's Bureau of Child Abuse and Exploitation and/or other type interviews that were typed, recorded by video or tape to include the complete transcript.

130. Any and all interviews by any and all agencies described in this report upon the request of the Office of Attorney General, the Pennsylvania State Police or the prosecutors assigned to this matter from the Office of Attorney General.

131. All questions, reference materials, profile studies, behavior projections as well as any and all assistance provided by the Federal Bureau of Investigation (FBI) or any other law enforcement agency within as well as outside the Commonwealth regarding this matter.

132. All reports, documents, records and court displays the Office of Attorney General/Commonwealth plans to use within their "case in chief" that were provided by any federal, state, county, sheriff and/or local law enforcement agency the Office of Attorney General has in its possession.

133. All names, business addresses and resumes of any and all experts the Office of Attorney General/Commonwealth plans to call upon to testify as an expert in victim psychology, offender profiling and traits in the science of Pedophilia to include the name of the courts the anticipated expert has testified and offered an opinion by the Commonwealth attorney/federal prosecutor as an expert in his/her field, and, provide copies of all the experts' consultation notes, interview notes, reports, files, documents, supplemental reports or other related materials the expert was called upon to review to form his/her opinion to a degree of certainty within the chosen field of study.

134. All investigative manuals, publications or related training materials that any and all Office of Attorney General agents or Pennsylvania State Police troopers have read, reviewed and received certified training that would enable such an agent/trooper to complete his/her investigation in this matter.

135. Provide all materials described above in a manner defense counsel can review and understand and, if needed, object through motions to any and all trial testimony, displays or other trial materials prior to trial allowing a reasonable time to review and understand the Office of Attorney General's intent with the evidence/testimony.

136. Defense counsel further requests that, should any and all of the above requested materials be in the preparation process, defense counsel is requesting the identification of such and the anticipated time counsel will receive it for review and potential objections to the content as well as anticipated expert testimony.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery..

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

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Joseph L. Amendola, Esquire

JLA:dka

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Nineteenth Supplemental Discovery Request
Based Upon all Information Received from The Second Mile
Regarding Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10
from Use of A Subpoena and/or Search Warrant.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a nineteenth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

137. All documents from The Second Mile regarding Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 to include:

a. All Second Mile documents that relate to referrals from high schools, Children and Youth Service Offices, Probation Departments and/or other means not described that a child would be allowed to be involved with attending Second Mile events that relate to the aforementioned Accusers/Alleged Victims;

b. All Second Mile progress reports, camp counselor reports, injury reports, psychiatric/psychological reports as well as any and all reports that involve the Accuser/Alleged Victim being removed from The Second Mile Program for violation of their rules and regulations;

c. All incident reports that involve the Accuser/Alleged Victim with others that the Accuser/Alleged Victim placed blame on another for alleged activities that were either founded/unfounded;

d. Any and all records prepared by The Second Mile personnel relating to the progress or the lack of progress involving the Accusers/Alleged Victims;

e. Any and all records, documents, files and reports that were provided by The Second Mile through use of a subpoena/search warrant that the Office of Attorney General or Pennsylvania State Police have within the Defendant's investigative files;

f. Any and all document reports that indicate which materials were returned to The Second Mile by description and number of pages or other means of accounting of the potential return that notes by record The Second Mile had been provided a return of the material(s);

g. Any and all pictures The Second Mile provided as a means to prepare and publish to any of the Accusers/Alleged Victims' camp counselors, directors or other volunteers as a means to indentify Second Mile providers of service to the Accusers/Alleged Victims;

h. Any and all Second Mile materials the Office of Attorney General/Commonwealth plans to use within its case in chief so defense counsel can review prior to trial should the need arise for defense counsel to raise objections relative to the content and purpose of the exhibit or document. NOTE: Should this evidence not be prepared, defense counsel requests the Office of Attorney General identify a date and time certain in which the exhibits, etc. will be available for defense counsel to obtain.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation

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April 10, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twentieth Supplemental Discovery Request.
Based on Information Received and/or Information Obtained
by the Office of Attorney General or Pennsylvania State Police
from Potential Victims Through any Means Including a Toll
Free Telephone Number.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twentieth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

137. Provide copies of any and all information to include records, documents, files, investigative and supplemental investigative reports regarding individuals who in any way contacted the Office of Attorney General/Commonwealth and/or the Pennsylvania State Police with information regarding investigations into these matters to include:

- a. All phone messages left on any toll free/non-toll free telephone numbers that are under contract with the Office of Attorney General and/or the Pennsylvania State Police;
- b. All records that relate to reverse call identification from the caller to identify the caller;
- c. All interviews conducted from callers identified by the Pennsylvania State Police or the Office of Attorney General;

d. All documents that relate to information received from the Office of Attorney General/Commonwealth and the Pennsylvania State Police as to the use of computer reporting systems that enable the public to report any crime through "CYBER" means in the Defendant's matters;

e. All investigations conducted by the Pennsylvania State Police Computer Crimes Division and/or the Office of Attorney General Computer Crimes Division that relate to the identification of unknown "CYBER" reports that pertain to the Defendant;

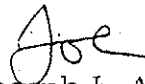
f. Any and all documents not described in this Twentieth Supplemental Request that in any way relate to toll free telephone number and cyber reports in regard to the Defendant;

g. All information including recordings of all voice messages that were left by Accuser/Alleged Victim 10 that resulted in the investigation by The Office of Attorney General or the Pennsylvania State Police.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

JLA:dka

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twenty-First Supplemental Discovery Request
Based on Investigative Efforts by the Office of Attorney
General and the Pennsylvania State Police for Financial
Records, Civil Judgments/Liens and the Filing of Bankruptcy
by Accusers/Alleged Victims 1, 3, 4, 5, 6, 7 9 and 10.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-first supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

138. All records for Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as they relate to the filing of bankruptcy within the Western, Middle and Eastern Districts of the Federal Court within the Commonwealth and/or any and all filings outside the Commonwealth.

139. This request shall further apply to all family members by birth or marriage that investigative efforts revealed such filings to include any and all copies of records obtained by a subpoena or search warrant.

140. All records that pertain to civil judgments/liens or disposition of personal property based on any and all levies placed on the above-referenced Accusers/Alleged Victims as well as any family member by birth or marriage to include any and all civil judgments/liens that were entered in the Courts of

Common Pleas for any and all counties within the Commonwealth or any court/jurisdiction outside the Commonwealth for the above-referenced Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as well as any of their family members by birth or marriage.

141. Any and all records that pertain to any false filings or misrepresentation of facts by any of the above-referenced Accusers/Alleged Victims for any federal, state, county or local courts.


142. All records that pertain to any false claims for unemployment/worker's compensation or other means of compensations that require statements of fact(s) from any of the above-referenced Accusers/Alleged Victims.

143. Any and all records that the Office of Attorney General, Commonwealth or Pennsylvania State Police obtained from use of a subpoena or search warrant not described within this request but in possession of the Office of Attorney General or Pennsylvania State Police.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twenty-Second Supplemental Discovery Request
Based on Education Records of Accusers/Alleged Victims 1,
3, 4, 5, 6, 7, 9 and 10 in the Possession of the Office of
Attorney General and Pennsylvania State Police.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-second supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

144. All grade school, middle school and high school records for the above-referenced Accusers/Alleged Victims not already provided to the Defendant to include:

- a. Grade reports;
- b. IQ Testing;
- c. Discipline reports by school officials which include in-school suspension, out-of school suspension and school board mandated expulsion from the school district to include any and all records, files, documents, investigation reports, supplemental reports that were provided by the school district which involved an investigation(s) by school-based law enforcement including officers detailed to the school district from political governments the school

district is located as well as all referrals to any law enforcement agency;

d. All documents, reports, files and pertinent information that describes the above-referenced Accusers/Alleged Victims being provided in-school service for behavior issues, TSS services while at school or any other in-school/out-of-school psychological or psychiatric services based upon their needs as identified by any professional staff or other individuals that in their opinion the child needed support services;

e. All school referrals to The Second Mile based in State College, Pennsylvania or any other group/organization that offers the same fundamental services as The Second Mile;

f. Any and all complaints filed by the above-referenced Accusers/Alleged Victims that were found to be without merit and/or any and all false allegations by the individual or parents that relate to information obtained from the school districts;

g. All grade reports and records involving the removal of the aforementioned Accusers/Alleged Victims from school for academic/non-academic rules and regulations violation obtained from colleges, junior colleges, business schools, trade schools or other institutions offering specialized education in a field of study as well as any and all educational loan default records involving the aforementioned Accusers/Alleged Victims;

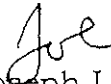
h. All information obtained from a subpoena/search warrant or by voluntary means not described above that the Office of Attorney General and/or the Pennsylvania State Police obtained regarding all aspects of aforementioned Accusers'/Alleged Victims' education.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to

the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twenty-Third Supplemental Discovery Request
Based on Materials Received and/or Information Obtained
by the Office of Attorney General or Pennsylvania State Police
Via U.S. Mail or Private Carrier Causing an Investigative Lead
in Regard to Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and
10.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-third supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

145. All letters, notes, files, documents delivered to the Pennsylvania State Police or the Office of Attorney General by U.S. Mail, or any other private carrier, that provided investigative leads relating to the aforementioned Accusers/Alleged Victims.

146. Any and all forensic reports for fingerprint analysis in an effort to indentify the sender.

147. All investigative reports with supplemental reports from the U.S. Postal Service Investigative Bureau that provided investigative support in any means regarding the described information.

148. All documents received involving investigative reports with supplemental reports, interviews with written narrative based upon investigative leads.

149. Any and all information that in any way provided details regarding the aforementioned Accusers/Alleged Victims that were not positive in nature that would in any way relate to their character/reputation and standing in the opinion of the public.

150. Any and all information not requested within this supplemental discovery request involving the aforementioned subject matter.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

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**In Re: Commonwealth vs. Gerald Sandusky
 Defendant's Twenty-Fourth Supplemental Discovery Request
 Based on all Medical, Psychological/Psychiatric Records in the
 Possession of the Office of Attorney General and the
 Pennsylvania State Police In Regard to Accusers/Alleged
 Victims 1, 3, 4, 5, 6, 7 9 and 10.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-fourth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete and non-redacted manner:

151. All of the aforementioned Accusers'/Alleged Victims' medical records from pediatric doctors starting from birth through completion of the medical provider's period of medical service before and after the investigation into these matters.

152. All medical records that pertain to family practice doctors who provided medical service before and after the investigation began involving the aforementioned Accusers/Alleged Victims.

153. All medical records of any and all specialists who, regardless of the medical field of practice, provided service to the aforementioned Accusers/Alleged Victims before and after the investigation in these matters began.

defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

A handwritten signature in cursive script, appearing to read "Joe".

Joseph L. Amendola, Esquire

JLA:dka

154. All psychological records for any and all services provided before/after The Sandusky Investigation began in regard to the aforementioned Accusers/Alleged Victims.

155. All Psychiatric records for any and all services before and after the investigation into these matters began involving the above-referenced Accusers/Alleged Victims.

156. All pediatric, family practice, medical specialist, psychological and psychiatric records obtained by a subpoena or search warrant that involves the aforementioned Accusers/Alleged Victims that in any way related to the investigation in these matters.

157. The aforementioned request Nos. 151 through 156 shall include all medical records from the above-referenced Accusers/Alleged Victims, non-medical providers, a parent or guardian, Children and Youth Services, schools, probation and parole department offices, Pennsylvania Department of Corrections, county prisons, hospitals, psychiatric or psychological inpatient and outpatient locations as well as any other locations not described above but in the possession of the Office of Attorney General/Commonwealth or Pennsylvania State Police.

158. Provide the full name(s), business address(es) and telephone number(s) of any and all medical practice doctor(s) and specialist(s), and psychiatric or psychological provider(s) that any of the above described information was provided for in order to conduct a review in preparation for an opinion to a degree of medical certainty regardless of the field the individual practices that the Office of Attorney General/Commonwealth plans on calling to testify in these matters as an expert along with all the documents provided by actual listing, the copy of the expert's letter/opinion(s) based upon the review of any and all reports, files, reviews, examinations, physical evidence, photographs, recordings of interviews by audio and/or video with the transcript or other relevant Office of Attorney General and Pennsylvania State Police incident reports with supplemental reports by page and supplemental report number along with any/all information not described above but provided.

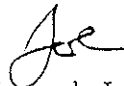
159. Any and all non-specifically identified documents, records and files provided for a review/opinion by a medical/psychological/psychiatric provider in regard to the aforementioned Accusers/Alleged Victims.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-

redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

A handwritten signature in black ink, appearing to read 'Joe' or 'Joseph', written in a cursive style.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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April 16, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twenty-Fifth Supplemental Discovery Request
Based on Judge John M. Cleland's April 12, 2012 Order
Directing the Office of Attorney General to Provide
Information of Uncharged Misconduct Evidence that Relates
to Possible Accusers 11, 12, 13, 14, 15, 16 and 17 as well as
Those Possible Accusers 18 and Beyond that the Office of
Attorney General Plans to Introduce as Uncharged Misconduct
in this Case.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and *Brady v. Maryland*, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-fifth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

160. Defense Counsel requests that all possible accusers who have been identified as Nos. 11 through 17 as well as those whose identification are numbered from 18 and beyond be provided by name, address, social security number, date of birth; and by all files, reports, supplemental reports, interviews by voice or video with transcript that were prepared by agents of the Office of Attorney General or troopers from the Pennsylvania State Police to include:

a. Any and all incident reports, supplemental reports, witness interviews, medical reports and/or all other related

documents that indicate the locations of the possible misconduct as described in interviews of the possible accusers;

b. All information obtained from any and all sources that provided investigators with leads and identification of possible Accusers 11 and beyond;

c. Any and all information, files, records, documents and related reports that involve the investigation of possible Accusers 11 and beyond that the Office of Attorney General and the Pennsylvania State Police have prepared and contained within the general file of the Office of Attorney/Commonwealth v. Gerald A. Sandusky;

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

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**In Re: Commonwealth vs. Gerald Sandusky
 Defendant's Twenty-Sixth Supplemental Discovery Request
 Based on all Pre-Trial Jury Preparation by the Office of
 Attorney General/Commonwealth or the Pennsylvania State
 Police**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-sixth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

161. Defense Counsel requests any and all information the Office of Attorney General/Commonwealth or the Pennsylvania State Police have prepared by way of a report, document, letter, e-mail, telephone survey or other method of identification regarding the jury pool within Centre County as well as a juror questionnaire that will be provided for the Court's review to include:

a. Any and all reports that reflect citizen answers/information relative to their opinion's of the Defendant's guilt or innocence based solely on public impression from news/radio/television broadcasts completed by the Office of Attorney General and or private vendor retained to complete the task;

b. All Internet Community Attitude Survey's conducted along with public attitudes, experiences and demographics of a

community that the Office of Attorney completed and or private vendor retained to complete this task;

c. All survey(s) conducted within Centre County regarding their knowledge and/or experience with child molestation/abuse;

d. All survey(s) conducted based upon the removal of Joseph V. Paterno, Sr., as Head Football Coach of The Pennsylvania State University and the citizens contacted by letter/internet/public surveys and/or other means of obtaining a public response to Paterno's removal as well as all reports that indicate the public, when questioned, felt that the investigation and allegations against the Defendant played a major role in the removal of Joe Paterno by The Pennsylvania State University Board of Directors;

e. All reports and information obtained through anecdotal investigation (i.e., conducting focus groups or mock trials);

f. All public opinion polls regarding The Pennsylvania State University, the Defendant, the investigation of the Defendant, The Second Mile or other individuals and/or agencies of which a poll was conducted;

g. "Test Questions" provided to any and all persons polled, interviewed or contacted by internet and the answers to potential *Voir Dire* questions;

h. All reports regarding jury questionnaire evaluations conducted by the Office of Attorney General or outside vendor retained to complete the task;

i. All reports and poll findings from any source of public opinions described within this supplemental discovery request or other not named or described that played a role in the juror questionnaire design;

j. Any and all final *Voir Dire* jury questions prepared or yet to be prepared by the Office of Attorney General or outside vendor tasked with this procedure;

k. Identify by name, business address, telephone number and copy of resume any and all jury expert(s), consultants or other individuals/experts the Office of Attorney General has retained for pre-trial work-up of polls, etc.

l. Identify by name, business address, telephone number and copy of resume any and all experts, consultants or other individuals the Office of Attorney General has retained to assist in jury selection and ongoing trial assistance with questions as needed in direct/cross of all witnesses;

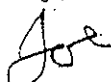
m. Identify by report or relative documents any expert(s) and/or consultant(s) who were retained by the Office of Attorney General and/or completed by the Office of Attorney General the public's understanding/perception and application of "reasonable doubt" that would apply in any matter before a jury;

n. Any and all contact information or source used to obtain contact information for internet, letter or other means of public contact of polls/public questions that sought opinions/feelings in these cases provided by an outside vendor or the Office of Attorney General.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitations defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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April 18, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twenty-Seventh Supplemental Discovery Request
Based on Facebook, Inc. Investigative Inquiry of Records by
the Office of Attorney General/Commonwealth and the
Pennsylvania State Police Relating to Accusers/Alleged
Victims 1, 3, 4, 5, 6, 7, 9 and 10.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-seventh supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

162. Any and all records obtained from Facebook, Inc. regarding accounts of Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 that were obtained by the use of a search warrant and/or subpoena to include:

a. Basic Subscriber Information (AKA NEOSELECT)
which will be delivered in XML format with the following included:

- 1) User identification number;
- 2) E-mail address;
- 3) Date and time stamp of account creation date displayed in COORDINATED UNIVERSAL TIME;
- 4) Most recent logins (AKA COORDINATED UNIVERSAL TIME);

7) Registered mobile number.

b. Further information is requested under an EXPANDED SEARCH (AKA NEOPRINT) for the following possible customer/possible customer address location as follows:

- 1) Profile contract information;
- 2) Mini-feed;
- 3) Status update history;
- 4) Shares;
- 5) Notes;
- 6) Wall Postings;
- 7) Friend listing, with Friends Facebook ID's;
- 8) Group listing, with Facebook Group ID's;
- 9) Future and past events;
- 10) Video listing, with filenames.

c. User Photos (AKA USER PHOTOPRINT) records are requested for the above possible customer list/possible customer address;

d. Group Information is requested with BSI of the Group Creator for the above-referenced possible customer name/possible customer address;

e. Private Messages, if retained, is requested in PDF format for the above-referenced possible customer name/possible customer address;

f. IP Logs are requested for the above referenced possible customer/possible customer address if available and please provide in a TAB DELIMITED TEXT FILE to include the following information for the above-referenced possible customer name/possible customer address:

- 1) {Column One} - Date of execution in PACIFIC TIME ZONE (UTC -8/-7);
- 2) {Column Two} - Userid - If available, the Facebook user ID of the active account as well as accounts that are no longer active;
- 3) {Column Three} IP - Source IP address of past/present;
- 4) {Column Four} - Script executed with profile view of the URL and SCRIPTGET for above-referenced possible customer/possible address;

5) {Column Five} Session COOKIE-HTTP cookie by user session for all past/current customers as identified by name/address.

g. Once the requests in Paragraphs a through f above have been completed, please perform the identical searches for any and all of the identified individuals/customers who interacted with the above-referenced names/addresses and/or among themselves;

h. Provide all Facebook, Inc. records, files, documents or other printed information regardless of the delivery method that was requested by the Pennsylvania Office of Attorney General/Commonwealth of Pennsylvania or the Pennsylvania State Police by use of a search warrant, criminal or Pennsylvania Grand Jury subpoenas. NOTE: If any of the above requested information is duplicate of what was provided to the Pennsylvania Office of Attorney General/Commonwealth of Pennsylvania or the Pennsylvania State Police by use of a search warrant or subpoena, please indicate any and all duplications and only one (1) copy is required;

i. Provide all information regarding Facebook, Inc. deleted/archived records that pertain to the above-referenced individuals/addresses or those who communicated with these individuals and/or among themselves.

163. All Facebook, Inc. records as requested in Subsections a through i above that were obtained from use of a search warrant and/or subpoena that Facebook, Inc. identified by account number/identification methods relating to the following addresses:

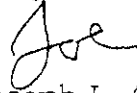
(REDACTED TO MAINTAIN ANONYMITY OF ACCUSERS/ALLEGED VICTIMS.)

(REDACTED TO MAINTAIN ANONYMITY OF ACCUSERS/ALLEGED VICTIMS.)

For this supplemental discovery request as well as all others, which the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

A handwritten signature in cursive script, appearing to read "Joe", written in dark ink.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

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April 18, 2012

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Jonelle H. Eshbach, Esquire
Senior Deputy Attorney General
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16th Floor Strawberry Square
Harrisburg, PA 17120

In Re: **Commonwealth vs. Gerald Sandusky**
Defendant's Twenty-Eighth Supplemental Discovery Request
Based on Research and Investigation of any and all Cell Phone
Usage by Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10
Conducted by the Office of Attorney General/Commonwealth
and the Pennsylvania State Police.

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-eighth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

164. Any and all cell phone information based upon the use of a search warrant and/or subpoena in regard to Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as well as for any past or current accounts relating to the following

(REDACTED TO MAINTAIN ANONYMITY OF ACCUSERS/ALLEGED VICTIMS.)

(REDACTED TO MAINTAIN ANONYMITY OF ACCUSERS/ALLEGED VICTIMS.)

165. All records from any and all preservation letter(s) to any cell phone provider that relevant information was obtained from use of a name.

166. All records from any and all preservation letter(s) to any cell phone provider that relevant information was obtained from use of an address.

167. All relevant information based upon records not described in Paragraph Nos. 164 through 166 above.

168. All documents that were obtained based upon a search of cell phone records from any of the following cell phone providers:

- a. AT& T Mobility (Cingular);
- b. Cricket communications;
- c. EMBARQ;
- d. On Star;
- e. Metro PCS;
- f. Qwest Communications;
- g. Sprint/Nextel Communications;
- h. T-Mobile, USA;
- i. TracFone Wireless, Inc.;
- j. U.S. Cellular;

- k. Celico Partnership dba Verizon Wireless;
- l. Globastar;
- m. Iridium Satellite;
- n. Majic Jack;
- o. Vonage;
- p. Skype

169. All records obtained from compliance with the United States Code Sections 2701, 2702, 2703(b)(2), (c) and (d) based on the use of a search warrant and/or subpoena to any and all of the cell phone companies listed above in Paragraph No. 168.

170. All records that relate to CALEA.

171. All records that relate to locating cell phone coverage by zip code.

172. All records involving CNET.

173. All records regarding cell tower locations in regard to this investigation.

174. All use of glossary of terms within the search warrant/subpoena.

175. All information from any and all photo Scoop(s) conducted.

176. All information from JSP.

177. All information from CDMA (Code Division Access).

178. All information from use of GSM (Global System for Mobil Communications).

179. All information from IDEN (Intergraded Digital Enhanced Network).

180. All information from MVNO (Mobile Virtual Network Operation).

181. All information from PCS (Personal Communications Service).

182. All information from SMS (Short Message Service).

183. All information from SIM Card.

184. All information from IMEI (International Mobile Equipment Identifier).

185. All information from ESN (Electric Serial Number).

186. All information from Cell Site.

187. All information from VoIP (Voice Internet Protocol).

188. All names associated with the addresses contained within this supplemental discovery request to include:

- a. Residence of owner, if known;
- b. Customer name for cell phone;
- c. Customer address if not the same;
- d. Names, addresses and other phone numbers on any and all accounts identified;
- e. All information provided by cell carrier based upon the searches for customers by name/address.

189. All information based upon the following for addresses/names:

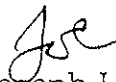
- a. Billing & account information with account notes;
- b. Incoming and outgoing cell tower records;
- c. Incoming and outgoing call detail records;
- d. Cell tower location information;
- e. All stored photographs or video images;
- f. All stored voice messages;
- g. Incoming and outgoing text messages;
- h. All deleted messages, texts, pictures and video imates.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to

the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

A handwritten signature in cursive script, appearing to read "Joe", written in dark ink.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twenty-Ninth Supplemental Discovery Request
Based on all Research and Investigations of Residential
Telephone Numbers for Accusers/Alleged Victims 1, 3, 4, 5, 6,
7, 9 and 10 Conducted by the Office of Attorney General/
Commonwealth and the Pennsylvania State Police.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a twenty-ninth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise; non-redacted manner:

190. Any and all residential phone numbers based upon the use of a search warrant and/or subpoena in regard to any past or current accounts relating to the following addresses:

(REDACTED TO MAINTAIN ANONYMITY OF ACCUSERS/ALLEGED VICTIMS.)

(REDACTED TO MAINTAIN ANONYMITY OF ACCUSERS/ALLEGED VICTIMS.)

191. Once the phone numbers are identified for the known addresses and ownership by Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 the following supplemental discovery materials are requested:

- a. All long distance telephone calls made;
- b. All calling records for numbers that are not considered long distance within the residential phone service;
- c. All calling records that relate to Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 calling by residential phones among themselves whether long distance or within residential service area as non-toll numbers called.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be

made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

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Joseph L. Amendola, Esquire

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April 18, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirtieth Supplemental Discovery Request
Based on any and all Use of Pen Registers and Trap-and-Trace.
Conducted by the Office of Attorney General and/or the
Pennsylvania State Police.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirtieth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

192. Based upon (18 U.S.C.A.) 3121-3127, which allows the above investigative measures of Pen Registers and Trap-and Trace under Smith v. Maryland, 422 U.S. 735.99 S.Ct.2577, 61 L.Ed.2d 220 (1979), please provide all records by way of the Pen Registers and Trap-and-Trace application time periods utilized by the Office of Attorney General and/or the Pennsylvania State Police for all residential calls made from/to the Defendant's residence of any and all numbers identified by Pen Registers and Trap-and-Trace to include the owner names of all phone numbers called from/to the Defendant's residence.

193. Please identify any names and telephone numbers that specifically relate to Pen Registers and Trap-and Trace measures involving Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10.

194. Identify any telephone numbers of Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 called with "pulse" information obtained.

195. All other records obtained not listed in Paragraph Nos. 192 through 194 above as a result of these type of investigative measures.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

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1000 Madison Avenue, Suite 310
Norristown, PA 19403

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

**In Re: Commonwealth vs. Gerald Sandusky
 Defendant's Thirty-First Supplemental Discovery Request
 Based on any and all Subpoena(s) Served by the Office of
 Attorney General or the Pennsylvania State Police Wherein a
 Motion to Quash the subpoena was Filed Based on Rule
 234.4(b) – Pa. Code, Motion to Quash**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirty-first supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

196. Any and all subpoena(s) that were served on any individual/organization/agency/school/college/medical providers as well all others not identified by name or description.

197. Identify by subpoena recipient any and all of the above described persons or groups that filed a Motion to Quash a subpoena pursuant to Rule 234.4(b) – Pa. Code, Motion to Quash providing copies of the subpoena and Motion to Quash documents.

198. All relevant testimony by all participants in a motions hearing relative to the Motion to Quash.

199. Any and all court rulings/directives regarding each motion.

200. All contested information with transcript of testimony.

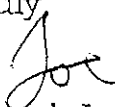
201. All information relative to this subject area regardless if the information was requested by specific description/name or event.

202. The supplemental requests made in Paragraph Nos. 196 through 201 apply to all information obtained for Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as well as unknown Accusers 11 through an unknown number.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly



Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

110 REGENT COURT

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April 19, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirty-Second Supplemental Discovery Request
Based on all Subpoenas and Search Warrants Served by the
Office of Attorney General or the Pennsylvania State Police
Involving the Defendant's Cases.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and *Brady v. Maryland*, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirty-second supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

203. All subpoenas that were served on any person, law enforcement agency, grade/middle/high school, college/trade school, potential employer, medical doctor regardless of the field of specialization, prison, psychiatric/psychological treatment center, Children and Youth Services, Adult Probation Departments and/or any and all locations, persons groups, agencies not identified within this Paragraph No. 203 involving.

204. All information obtained from the subpoenas with an indication and a delivery date as to whether the subject information has already been provided to the Defendant.

205. The supplemental requests in Paragraph Nos. 203 and 204 apply to Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as well as unknown Accusers 11 and beyond.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

A handwritten signature in dark ink, appearing to read "Joe", is written over the printed name.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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April 19, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirty-Third Supplemental Discovery Request
Based on any and all Offers Provided by the Office of Attorney
General or Pennsylvania State Police of Immunity, Plea Deals,
and/or Reductions of Sentences in Pending Criminal Cases for
any and all Witnesses in the Defendant's Cases.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirty-third supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

206. All offers of immunity, plea deals and/or reductions of sentence offered to Commonwealth witnesses for testimony by any and all persons before the Grand Jury in the Defendant's investigation.

207. All testimony provided under the umbrella of immunity, plea deals and/or reduction in sentence offered to witnesses in these matters.

208. Any and all arrangements made by the Office of Attorney General/Commonwealth or Pennsylvania State Police with Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 and/or their family members that result in the Accusers/Alleged Victims receiving beneficial treatment in any Commonwealth court or any court outside of the Commonwealth.

209. Any and all arrangements made between the Office of Attorney General/Commonwealth or the Pennsylvania State Police with Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 that enabled them to benefit in any manner by testifying against the Defendant.

210. All deals of immunity and/or reduction in sentence offered by the Office of Attorney General/Commonwealth or the Pennsylvania State Police for testimony by Accusers 11 through an unknown number before the Grand Jury regarding the investigation in these matters.

211. Any and all arrangements between any and all persons who provided testimony before the Grand Jury not described above.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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April 23, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirty-Fourth Supplemental Discovery Request
Based on all Investigative Efforts to Identify/Obtain Current
or Past Employment Records by the Office of Attorney
General and Pennsylvania State Police for Accusers/Alleged
Victims 1, 3, 4, 5, 6, 7, 9 and 10 by Use of a Search Warrant or
Subpoena.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirty-fourth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

211. All aspects of current and past employment records for Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 based upon the use of a subpoena or search warrant by the Office of Attorney General or Pennsylvania State Police to include all employment applications, all background investigations completed, all employment records for promotion(s), all employment records that relate to demotion(s) in employment classification/loss of pay and or benefits, all employment records that relate to employment dismissal albeit corporate office or local management personnel along with the records regarding the employment dismissal/removal, and all employment records that pertain to charges of theft/misuse of company property that resulted in an investigation by law enforcement to include the law

enforcement investigative reports with supplemental as well as the case disposition.

212. All employment records that relate to claims for unemployment along with the Commonwealth's directive from the local unemployment office regarding payment of benefits.

213. Any and all claims under the Worker's Compensation Act of the Commonwealth of Pennsylvania for claims filed in regard to Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 to include all workers' compensation records regarding contested claims, false claims, medical expert opinion(s), hearing(s) before Workers' Compensation Division judges, all final orders for payment of assigned benefits or decision(s) for denial of any and all claims including judges' conclusions after hearing testimony or reviewing documents

214. The above requests in Paragraph Nos. 211 through 213 are to apply to all individuals identified as Accusers 11 through 17 as well as 18 through an unknown number.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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April 24, 2012

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Harrisburg, PA 17120

**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirty-Fifth Supplemental Discovery Request
Based upon the Defendant's Requirements for Full Disclosure
of any and all Investigations into Services Provided by Social
Service Agencies to Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9
and 10.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirty-fifth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

215. All social service agency reports, files, documents, AXIS I II III IV and V diagnosis(s), psychiatric/psychological, medical examination(s), interview reports to include oral/video recording(s), IQ testing, vocational assessments, grade, middle and high school records (inclusive), any and all juvenile records obtained for individuals, plus all records that are not described in this Paragraph No. 215, but all Office of Attorney General and Pennsylvania State Police records regarding these services that were requested and obtained through the use of a subpoena and or search warrant from the following services/agencies:

- a. Bureau of Vocational Rehabilitation to include any and all district offices within the Commonwealth of Pennsylvania;
- b. Pentz Run Youth Services;

- c. Dubois School District to include any and all school districts not included in discovery to date;
- d. Canalways;
- e. The Meadows Psychiatric Center;
- f. The Meadows/Universal Community Behavioral Health, Inc.;
- f. Centre County Children and Youth Services;
- g. Blair County Children and Youth Services;
- h. Any County Children and Youth Services not provided within discovery to date;
- i. Manito Centers for Innovative Learning;
- j. Children's and Adolescent Partial Hospitalization Program;
- k. All human service agencies, learning support agencies, partial hospitalization programs, psychiatric/psychological providers, schools not described in this request but in the possession of the Office of Attorney General/Pennsylvania State Police.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,



Joseph L. Amendola, Esquire

JLA:dka

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April 24, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirty-Sixth Supplemental Discovery Request
Based upon The Pennsylvania State University's
Removal/Termination of Employment of Mark Sherburne as
Assistant Athletic Director.**

Dear Joe and Jonelle:

Pursuant to Rule 573(b)(1) of the Pennsylvania Rules of Criminal Procedure and Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L.Ed.2d 215 (1963), I hereby make a thirty-sixth supplemental request for disclosure of the following items and information material to our client's cases to be provided in a complete, clear and concise, non-redacted manner:

216. In regard to the above-referenced matters including the removal/termination of Mark Sherburne as Assistant Athletic Director for The Pennsylvania State University, please provide the following:

- a. All investigative reports;
- b. All supplemental investigative reports;
- c. All interviews (taped/recorded);
- d. All files/documents/records obtained from The Pennsylvania State University regarding the aforementioned individual;
- e. All e-mails regardless of the rotation between Mr. Sherburne and any and all current or former Penn State University employee(s);

f. All e-mails sent to Mr. Sherburne or forwarded to Mr. Sherburne regardless of the e-mail rotation;

g. All Penn State University records, files, documents, internal investigations or private-vendor investigations retained by The Freeh Investigative Group or other vendor not identified by this supplemental request;

h. Any and all e-mails sent by former Athletic Director Timothy Curley, former Vice-President Gary Schultz and/or any other current/former Penn State University employee regarding the Sandusky investigation and/or other e-mails regardless of the rotation (to/from/forward) that in any way deal with the removal/dismissal of Mr. Sherburne that are in the possession of the Office of Attorney General/Pennsylvania State Police and obtained through a subpoena or search warrant;

i. Any and all reports in regard to the above-subject matter as well as other information obtained but not identified within this request that pertain to the Sandusky/Penn State University investigation.

For this supplemental discovery request as well as all others, when the Pennsylvania State Police or The Office of Attorney General, within the supplemental reports, makes reference to attachments for the incident reports/supplemental reports, defense counsel is requesting complete and non-redacted copies of all attachments including avoiding sound and video alterations unless otherwise provided by mutual discovery.

These supplemental requests shall be deemed continuing to the time of trial. If any additional information not included in responses to the above requests become available to the Commonwealth or its agents between the time responses are made and the time of trial, such information shall forthwith be made known to the Defendant's counsel. The above information is needed to prepare a full, adequate defense, including alibi and statute of limitation defenses thereby making disclosure of the requested information imperative to the Defendant in the preparation of his defense in these matters. Your prompt attention to this matter is greatly appreciated.

Truly,

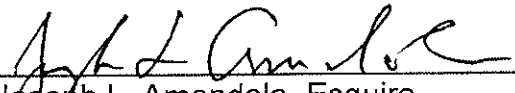


Joseph L. Amendola, Esquire

JLA:dka

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