

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

COMMONWEALTH OF PENNSYLVANIA, :

vs. :

GERALD A. SANDUSKY :

CP-14-CR-2421-2011

CP-14-CR-2422-2011

FILED FOR RECORD
2012 APR 30 P 12:00
DEBORAH J. IMMEL
PROCLAMATORY
CENTRE COUNTY, PA

**MOTION TO QUASH SUBPOENA DUCES TECUM AND/OR
FOR PROTECTIVE ORDER**

1. This matter arises out of incidents alleged to have occurred between January 1994 and December of 2008.

2. In particular, the Defendant is alleged to have perpetrated certain criminal acts upon a minor victim known as Victim Number 1, which acts include, but are not limited to, engaging in Involuntary Deviate Sexual Intercourse, Indecent Assault, and Unlawful Contact With a Minor. A copy of the applicable Criminal Complaint is attached hereto as Exhibit "A."

3. In preparation for trial in this matter, and as part of the corresponding discovery process, the Defendant served a subpoena upon Kelly Hastings, the Superintendent of the Keystone Central School District, and therein requested the production of certain educational records and other documentation relative to Victim Number 1. A copy of this Subpoena is attached hereto as Exhibit "B."

4. Pennsylvania Courts hold that material and documentation not discoverable pursuant to Pennsylvania Rule of Criminal Procedure 573, may be discovered through the service of a subpoena pursuant to Pennsylvania Rule of Criminal Procedure 107.

5. However, the Defendant must articulate a reasonable basis for the request as utilizing subpoenas to compel production of documents merely for inspection or for a fishing expedition is improper. See Commonwealth v. Cook, 865 A.2d 869, 877 (Pa. Super. 2004).

6. Furthermore, a subpoena is improper when it is unduly broad or requires the improper inclusion of irrelevant information. Commonwealth V. Meja-Arias, 734 A.2d 870, 875 (Pa. Super. 1997).

7. Here, the Defendant fails to articulate a foundation as to the reasonableness, materiality and justiciability of such a request.

8. Furthermore, much of the documentation and information requested constitutes confidential and/or privileged information.

A. Specifically, any communications between a guidance counselor and a student are confidential communications pursuant to 42 Pa.C.S.A. § 5945.

B. Any communications between a student and a licensed psychologist or psychiatrist are confidential communications pursuant to 42 Pa.C.S.A. § 5944.

9. Finally, the disclosure of educational records held by public schools, such as the Keystone Central School District, is governed by Federal Law which precludes the disclosure of educational records, other than directory information, without written

consent from the student's parents or the student, if over the age of 18, or pursuant to any "lawfully issued subpoena". See 20 U.S.C. §1232(g).

10. Here, because the Defendant has failed to articulate a foundation as to the reasonableness, materiality and justiciability of his subpoena, it is not lawfully issued and therefore any corresponding request for educational records should be denied and/or quashed.

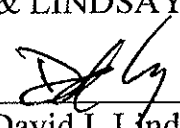
11. In light of the nature of the educational records requested, should the Court desire to review any such records in order to better determine the reasonableness of Defendant's subpoena, the Keystone Central School District requests that such review occur *in camera*.

WHEREFORE, the Keystone Central School District respectfully requests that this Honorable Court quash Defendant's subpoena or, in the alternative, issue an appropriate protective order.

Respectfully submitted,

HALL & LINDSAY, P.C.

BY



David I. Lindsay, Esquire
PA. I. D. #201563
Counsel for Keystone Central
School District
138 East Water Street
Lock Haven, PA 17745

Date:

4/26/12

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF: CENTRE

Magisterial District Number: 49-2-01
MDJ: Hon. LESLIE A. DUTCHCOT
Address: 1524 WEST COLLEGE AVENUE
STATE COLLEGE, PA, 16801
Telephone: (814)237-4981



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

GERALD

ARTHUR

SANDUSKY

First Name

Middle Name

Last Name

Gen.

130 GRANDVIEW ROAD STATE COLLEGE, PA 16801

NCIC Extradition Code Type

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☒ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States ☐ Distance: _____
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-1036-11</u>	Date Filed <u>11/04/2011</u>	OTN/LiveScan Number <u>1109247-5</u>	Complaint/Incident Number <u>G07-1146135</u>	SID	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>01/26/1944</u>	POB <u>WASHINGTON, PA</u>	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA					
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
HAIR COLOR <input checked="" type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
EYE COLOR <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
Driver License	State <u>PA</u>	License Number <u>12547344</u>	Expires: <u>/ /</u>	WEIGHT (lbs.)	
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location		<u>215</u>	
FBI Number		MNU Number		Ft. HEIGHT In.	
Defendant Fingerprinted	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			<u>6</u>	<u>1</u>
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

Plate # <u>PS00371</u>	State <u>PA</u>	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) <u>03/12</u>	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input checked="" type="checkbox"/>
VIN <u>1HGFA16566L080302</u>	Year <u>2006</u>	Make <u>HONDA</u>	Model <u>CIVIC</u>	Style <u>SEDAN</u>	Color <u>SILVER</u>		

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, CPL. SCOTT ROSSMAN/AGT. A.L. SASSANO
(Name of the Affiant)

SP502207- 8491 / AT504374-367
(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of PA STATE POLICE/ PA ATTORNEY GENERAL
(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

PAPSP7400/ PA022240
(Police Agency ORI Number)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as

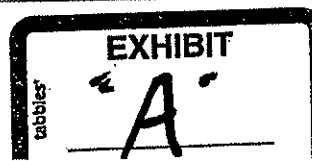
☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [] VARIOUS LOCATIONS
(Subdivision Code) (Place-Political Subdivision)

in CENTRE County

[14]

(County Code)

on or about JANUARY 1994 TO DECEMBER 2008





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input checked="" type="checkbox"/>	1	3123	A7	of the	TITLE 18	2	F1		02A
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Involuntary Deviate Sexual Intercourse									
Acts of the accused associated with this Offense: In that the defendant did engage in deviate sexual intercourse with a complainant who was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY did engage in involuntary deviate sexual intercourse with juvenile victim #1.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/>	2	3123	A7	of the	TITLE 18	1	F1		02A
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Involuntary Deviate Sexual Intercourse									
Acts of the accused associated with this Offense: In that the defendant did engage in deviate sexual intercourse with a complainant who was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY did engage in involuntary deviate sexual intercourse with juvenile victim #2.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/>	3	3123	A7	of the	TITLE 18	3	F1		02A
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Involuntary Deviate Sexual Intercourse									
Acts of the accused associated with this Offense: In that the defendant did engage in deviate sexual intercourse with a complainant who was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY did engage in involuntary deviate sexual intercourse with juvenile victim #4.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/03/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	---	--	--

<input type="checkbox"/>	4	3123	A7	of the	TITLE 18	1	F1		02A
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Involuntary Deviate Sexual Intercourse

Acts of the accused associated with this Offense: In that the defendant did engage in deviate sexual intercourse with a complainant who was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did engage in involuntary deviate sexual intercourse with juvenile victim #8.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	---	--	--

<input type="checkbox"/>	5	3125	A8	of the	TITLE 18	1	F2		170
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Aggravated Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did engage in penetration, however slight, of the genitals or anus of a complainant with a part of the person's body for any purpose other than good faith medical, hygienic or law enforcement procedures. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did engage in aggravated indecent assault with juvenile victim #4.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	---	--	--

<input type="checkbox"/>	6	3126	A7	of the	TITLE 18	1	F3		170
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did have indecent contact with juvenile victim #1.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> 7	3126	A8	of the	TITLE 18	1	M2		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did have indecent contact with juvenile victim #2.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> 8	3126	A8	of the	TITLE 18	1	M2		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did have indecent contact with juvenile victim #3.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> 9	3126	A8	of the	TITLE 18	1	M2		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did have indecent contact with juvenile victim #4.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> 10	3126	A7	of the	TITLE 18	1	M1		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 13 years of age and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with juvenile victim #5.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> 11	3126	A7	of the	TITLE 18	1	M1		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 13 years of age and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with juvenile victim #6.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> 12	3126	A8	of the	TITLE 18	1	M2		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): Indecent Assault

Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did have indecent contact with juvenile victim #8.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 13	3126	A8	of the	TITLE 18	1	M2		170
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): (Criminal Attempt)Indecent Assault								
Acts of the accused associated with this Offense: In that the defendant did cause the complainant to have indecent contact with the person for the purpose of arousing sexual desire in the person or the complainant and the complainant was less than 16 years of age and the person was four or more years older than the complainant and the complainant and the person were not married. TO WIT: The defendant Gerald A. SANDUSKY being more than 20 years of age did attempt to have indecent contact with juvenile victim #7.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 14	6318	A1	of the	TITLE 18	1	F1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor								
Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of engaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have contact with a minor, juvenile victim #1 for the purpose of engaging in sexual offenses.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 15	6318	A1	of the	TITLE 18	1	F1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor								
Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of engaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #2 for the purpose of engaging in sexual offenses.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
------------------	---	---	---

<input type="checkbox"/>	16	6318	A1	of the	TITLE 18	1	F3		260
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor

Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of angaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #3 for the purpose of engaging in sexual offenses.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
------------------	--	---	---

<input type="checkbox"/>	17	6318	A1	of the	TITLE 18	1	F1		260
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor

Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of angaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #4 for the purpose of engaging in sexual offenses.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
------------------	--	---	---

<input type="checkbox"/>	18	6318	A1	of the	TITLE 18	1	F3		260
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor

Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of angaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #5 for the purpose of engaging in sexual offenses.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
--	--	---	---

<input type="checkbox"/> 19	6318	A1	of the	TITLE 18	1	F3		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor

Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of engaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #6 for the purpose for engaging in sexual offenses.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
--	--	---	---

<input type="checkbox"/> 20	6318	A1	of the	TITLE 18	1	F3		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor

Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of engaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #7 for the purpose of engaging in sexual offenses.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
--	--	---	---

<input type="checkbox"/> 21	6318	A1	of the	TITLE 18	1	F1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Unlawful Contact with Minor

Acts of the accused associated with this Offense: In that the defendant did intentionally have contact with a minor for the purpose of engaging in any activity prohibited in any of the offenses enumerated in chapter 31(relating to sexual offenses). TO WIT: The defendant Gerald A. SANDUSKY did have indecent contact with a minor, juvenile victim #8 for the purpose of engaging in sexual offenses.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/>	22	6301	A1	of the	TITLE 18	1	M1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Corruption of Minors									
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #1.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/>	23	6301	A1	of the	TITLE 18	1	M1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Corruption of Minors									
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #2.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
<input type="checkbox"/>	24	6301	A1	of the	TITLE 18	1	M1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Corruption of Minors									
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #3.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 25	6301	A1	of the TITLE 18	1	M1		260	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number:			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Corruption of Minors								
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #4.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 26	6301	A1	of the TITLE 18	1	M1		260	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number:			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Corruption of Minors								
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #5.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 27	6301	A1	of the TITLE 18	1	M1		260	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number:			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Corruption of Minors								
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #6.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
<input type="checkbox"/> 28	6301	A1	of the TITLE 18
Lead?	Offense#	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
			260
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Corruption of Minors			
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #7.			

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
<input type="checkbox"/> 29	6301	A1	of the TITLE 18
Lead?	Offense#	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
			260
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Corruption of Minors			
Acts of the accused associated with this Offense: In that the defendant, being of the age of 18 or upwards , by any course of conduct corrupts or tends to corrupt the morals of any minor less than 18 years of age, or entices or encourages any 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 #8.			

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
<input type="checkbox"/> 30	4304	A1	of the TITLE 18
Lead?	Offense#	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
			260
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children			
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #1 by a course of conduct.			



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 31	4304	A1	of the TITLE 18	1	M1		260	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children								
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #2.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 32	4304	A1	of the TITLE 18	1	F3		260	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children								
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #3 by a course of conduct.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 33	4304	A1	of the TITLE 18	1	F3		260	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children								
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #4 by a course of conduct								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 34	4304	A1	of the	TITLE 18	1	F3		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children								
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #5 by a course of conduct.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 35	4304	A1	of the	TITLE 18	1	M1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children								
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #6.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
<input type="checkbox"/> 36	4304	A1	of the	TITLE 18	1	M1		260
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Endangering Welfare of Children								
Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #7.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number 607-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> Lead?	37	4304	A1	3304	TITLE 18	1	M1		260
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

Permit/OT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-----------------------------------	--------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): Endangering Welfare of Children

Acts of the accused associated with this Offense: In that the defendant, being a parent, guardian other persons supervising the welfare of a child under the age of 18 who knowingly endangers the welfare of a child by violating a duty of care, protection or support. TO WIT: The defendant Gerald A. SANDUSKY did endanger the welfare of juvenile victim #8.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> Lead?									
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

Permit/OT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-----------------------------------	--------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense: I

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	--	---	---

<input type="checkbox"/> Lead?									
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

Permit/OT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
-----------------------------------	--------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance):



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
4. This complaint consists of the preceding page(s) numbered 1 through 15.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

NOVEMBER 4, _____ 2011
(Date)

[Signature] #8491
(Signature of Affiant)

AND NOW, on this date November 4, 2011 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

49-2-01
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 11/04/2011	OTN/LiveScan Number	Complaint/Incident Number G07-1146135
Defendant Name:	First: GERALD	Middle: ARTHUR	Last: SANDUSKY

AFFIDAVIT of PROBABLE CAUSE

SEE EXHIBIT "A" ATTACHED

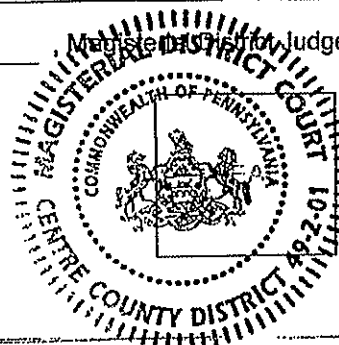
I, TRP. SCOTT ROSSMAN & AGT. A.L. SASSANO, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

[Signature] #8491
(Signature of Affiant)

Sworn to me and subscribed before me this 4 day of November 2011

11-4-11 Date *[Signature]* Magistrate/Judge

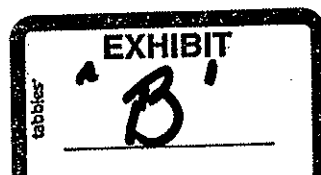
My commission expires first Monday of January, 2014



NOTICE

**BY ORDER OF THE COURT OF COMMON
PLEAS OF CENTRE COUNTY,
PENNSYLVANIA, DATED MARCH 13, 2012,
ANY PERSON OR AGENCY RECEIVING THIS
SUBPOENA IS NOTIFIED THAT THE NAME
OR ANY IDENTIFYING INFORMATION OF
THE PERSON FOR WHOM THE RECORDS
OR OTHER INFORMATION IS SOUGHT IS
PROTECTED BY THE SEAL OF THE COURT.**

**UNDER POTENTIAL PENALTY OF
CONTEMPT OF COURT, THE PERSON'S
NAME OR IDENTIFYING INFORMATION MAY
NOT BE DISCLOSED TO ANY PERSON
EXCEPT AS REQUIRED TO COMPLY WITH
THIS SUBPOENA.**



Commonwealth of Pennsylvania
COUNTY OF CENTRE

COMMONWEALTH OF PENNSYLVANIA

VS.

GERALD A. SANDUSKY, DEFENDANT

TO MS. KELLY HASTINGS, SUPERINTENDANT, CENTRAL MOUNTAIN SCHOOL DISTRICT, 110 EAST BALD
EAGLE STREET, LOCK HAVEN, PA 17745

You are ordered by the court to come to CENTRE COUNTY COURTHOUSE, COURTROOM NO. 1,

SECOND FLOOR, 102 SOUTH ALLEGHENY STREET at Bellefonte, Pennsylvania, on

WEDNESDAY, MAY 16, 2012 at 10:00 A. M. to testify on behalf of

DEFENDANT in the above-captioned case

and to remain until excused.

And bring with you the following: COMPLETE AND NON-REDACTED COPIES OF THE
INFORMATION REQUESTED IN THE SUBPOENA ATTACHMENT.

Witness, the Honorable, Thomas K. Kistler, President Judge of our said
Court at Bellefonte, this 9TH day of APRIL, A.D. 20 12

 Prothonotary

If you fail to attend or to produce the documents or things required by this Subpoena, you may be
subject to the sanctions authorized by Rule 234.5 of the Pennsylvania rules of Procedure, including, but
not limited to, costs, attorney fees, and imprisonment.

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW
110 REGENT COURT
SUITE 202
STATE COLLEGE, PA 16801-7966

TELEPHONE
814-234-6821

FAX
814-234-6013

SUBPOENA ATTACHMENT

Ms. Kelly Hastings, Superintendant
Central Mountain School District
110 East Bald Eagle Street
Lock Haven, PA 17745

Re: Commonwealth of Pennsylvania vs. Gerald A. Sandusky,
Nos. CP-14-CR-2421-2011 & CP-14-CR-2422-2011

Dear Ms. Hastings:

Upon receipt of this correspondence please make certain the name of Accuser/Alleged Victim 1 be given the utmost consideration from being made public in order to comply with the Order of the Court dated March 13, 2012 which I have enclosed for your information. This Order applies to all person(s) who may gain knowledge of the name.

Pursuant to the enclosed Subpoena and Subpoena Attachment, you are requested to provide Joseph L. Amendola, Esquire, 110 Regent Court, Suite 202, State College, PA 16801 with copies of Central Mountain School District records, documents and reports as well as other information kept and maintained by your District as described in this Subpoena Attachment. The following records, documents and reports are to be provided in their original form with no redactions and/or pages omitted:

A. Copies of the entire school district records as kept and maintained by the Central Mountain School District for Accuser/Alleged Victim 1 ([REDACTED]) to include the following:

1. Complete school records;
2. All IQ/intelligence testing as well as the method/manner of testing;
3. All school discipline records to include "in-school" suspension, "out-of-school" suspensions and expulsions of the student as mandated by district policy;

4. All records that detail any psychiatric/psychological diagnosis including Axis I, II, III, IV and V;

5. All records that describe any "in-school" services provided by the school district or outside vendor who provides such services for behavior related issues, TSS support and/or behavior specialist who prepared or managed treatment plans for the student while at the school for any academic day;

6. Any and all school records to include medical information, psychiatric and psychological records provided the Office of Attorney General, the Pennsylvania State Police and/or other federal, state, sheriff or local law enforcement agencies through use of a subpoena, search warrant or voluntary means by the school district to the requesting law enforcement agency;

7. Any and all school records provided to any CYS County Agency, adult/juvenile probation office, long/short-term treatment center, county jails or similar locations that a child would be prevented from leaving such as juvenile detention centers;

8. All grade reports for any period the child was a student;

9. All records that were provided to the Central Mountain School District by the student or another school district in regard to a possible transfer from another school district;

10. All school district reports from the transferring district along with the name of the district the child transferred from during any academic year or prior to the start of the following academic year;

11. All absentee days along with any and all medical or other reasons the child was not in attendance for the academic year to include the name and address of the physician and/or medical provider wherein an attendance excuse was provided;

12. All investigative reports prepared by Officer Brandon Coleman of the Central Mountain School District Police Department/Office of Public Safety in regard to a complaint of harassment/stalking Accuser/Alleged Victim 1 filed wherein an investigation was conducted and the complaint determined to be "unfounded".

13. All Clinton County School District records not specified in Paragraph Nos. 1 through 12.

Truly,



Joseph L. Amendola, Esquire

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

COMMONWEALTH OF PENNSYLVANIA

VS.

GERALD A. SANDUSKY

CP-14-CR-2421-2011
CP-14-CR-2422-2011

ORDER

AND NOW, MARCH 13, 2012, to carry out the agreement reached between counsel, it is ordered as follows:

1. The names of persons heretofore identified as Victims 1 through 10 shall remain protected under the seal of the Court and may not be disclosed by any person, except pursuant to court order or other authorization of the court.

2. Any subpoena seeking records regarding the alleged victims who have been publicly identified to date only as Victims 1 through 10 from child welfare agencies; physicians, hospitals or other medical providers; mental health providers; schools; social service agencies; or the like, shall have affixed to the front of the subpoena in at least 18 point type the following notice:


NOTICE

BY ORDER OF THE COURT OF COMMON PLEAS OF CENTRE COUNTY PENNSYLVANIA, DATED MARCH 13, 2012, ANY PERSON OR AGENCY RECEIVING THIS SUBPOENA IS NOTIFIED THAT THE NAME OR ANY IDENTIFYING INFORMATION OF THE PERSON FOR WHOM THE RECORDS OR OTHER INFORMATION IS SOUGHT IS PROTECTED BY THE SEAL OF THE COURT.

UNDER POTENTIAL PENALTY OF CONTEMPT OF COURT, THE PERSON'S NAME OR IDENTIFYING INFORMATION MAY NOT BE DISCLOSED TO ANY PERSON EXCEPT AS REQUIRED TO COMPLY WITH THIS SUBPOENA.

FILED FOR RECORD
2012 MAR 13 A 9:03
DEBRA C. IMMEL
PROTHONOTARY
CENTRE COUNTY, PA

By the Court:


John M. Cleland, S.J.
Specially Presiding

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


COMMONWEALTH OF PENNSYLVANIA, :
: CP-14-CR-2421-2011
vs. : CP-14-CR-2422-2011
: :
GERALD A. SANDUSKY :

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of April, 2012, I served a copy of the foregoing Motion to Quash Subpoena and/or for Protective Order upon Joseph L. Amendola, Esquire, 110 Regent Court, Suite 202. State College, PA 16801-7966, Slade McLaughlin Esquire, One Commerce Square, 2005 Market Street, Suite 2300, Philadelphia, PA 19103, Michael J. Boni, Boni & Zack, LLC, 15 St. Asaphs Road, Bala Cynwyd, PA 19004 and Jonelle Eshbach, Esquire, Senior Deputy Attorney General, 1600 Strawberry Square, Harrisburg, PA 17120 by United States Mail, First Class, Postage Prepaid.

Respectfully submitted,

Hall & Lindsay, P.C.

By 
David I. Lindsay, Esquire
PA.I.D. #201563
Counsel for Keystone
Central School District
138 East Water Street
Lock Haven, PA 17745
(570) 748-4802

FILED FOR RECORD
2012 APR 30 P 12:45
DEBRA C. IMMEL
PROTHONOTARY
CENTRE COUNTY, PA