

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

COMMONWEALTH OF PENNSYLVANIA

vs.

GERALD A. SANDUSKY

No. CP-14-CR-2421-2011 &

Commonwealth Attorneys:

Defense Attorneys:

*Frank G. Fina, Esquire
Joseph McGettigan, Esquire
Jonelle H. Eshbach, Esquire
Joseph L. Amendola, Esquire
Karl Rominger, Esquire*

MOTION TO RELEASE BAIL

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE SPECIALLY PRESIDING
IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA

AND NOW, comes the Defendant, GERALD A. SANDUSKY, through his
attorney, Joseph L. Amendola, Esquire, who respectfully represents the following:

1. The Defendant's wife, Dottie Sandusky, posted Fifty Thousand and 00/100 (\$50,000.00) Dollars cash bail with the Centre County Prothonotary's Office as part of the bail in Criminal Information No. CP-14-CR-2421-2011.

2. The Defendant and Dottie Sandusky also used as collateral, as part of the Defendant's bail, Two Hundred Thousand and 00/100 (\$200,000.00) Dollars of the value of their residential property located at 130 Grandview Road, College Township, Centre County, Pennsylvania in Criminal Information No. CP-14-CR-2421-2011.

3. *Pennsylvania Rule of Criminal Procedure 535* provides that, since the Defendant's bail was revoked by the Court following Defendant's trial which ended on June 22, 2012, Mrs. Sandusky is entitled to the return of the cash bail which she posted

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PROTHONOTARY
CENTRE COUNTY, PA

with the Centre County Prothonotary's Office in this matter as well as the release of the Sanduskys' residential property located at 130 Grandview Road in College Township, Centre County, Pennsylvania which was used as collateral for the remaining Two Hundred Thousand and 00/100 (\$200,000.00) Dollars of the Defendant's bail in this matter. Please see *Pennsylvania Rule of Criminal Procedure 535*. See also *Commonwealth v. McDonald*, 476 Pa. 217, 382 A.2d 124 (1978).

4. For all the aforementioned reasons, the Defendant respectfully requests this Honorable Court to enter an Order directing the Centre County Prothonotary to return the Fifty Thousand and 00/100 (\$50,000.00) Dollars cash bail posted by Dottie Sandusky with the Centre County Prothonotary's Office in this matter as well as an Order directing the Centre County Prothonotary to release the Sanduskys' real property located at 130 Grandview Road, College Township, Centre County, Pennsylvania which was used as collateral for Two Hundred Thousand and 00/100 (\$200,000.00) of the Defendant's bail in this matter.

Respectfully submitted,

BY:

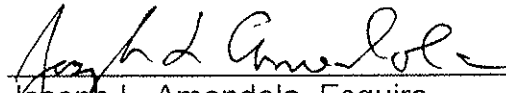


Joseph L. Amendola, Esquire
Attorney for Defendant
110 Regent Court, Suite 202
State College, PA 16801
(814) 234-6821
I.D. No. 17667

Date: October 2, 2012

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

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Karl Rominger, Esquire*

Defense Attorneys:

CERTIFICATE OF SERVICE

AND NOW, this 2nd day of October, 2012, I, Joseph L. Amendola, hereby certify that I have, this date, served a copy of the foregoing document, by:

Mailed U.S. Mail, First-Class

Hon. John M. Cleland, Senior Judge
c/o Ms. Maxine Ishler, Court Administrator
Centre County Courthouse
102 South Allegheny Street
Bellefonte, PA 16823


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Hon. Debra C. Immel
Prothonotary/Clerk of Courts
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