

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

COMMONWEALTH OF PENNSYLVANIA)

vs.)

GERALD A. SANDUSKY)

Nos. CP-14-CR-2421-2011
CP-14-CR-2422-2011

Commonwealth Attorneys:

Defense Attorney:

Joseph McGettigan, Esquire
Jonelle H. Eshbach, Esquire
Joseph L. Amendola, Esquire

FILED
2012 MAY - 3
10:13
DEBRA C. PROTHON
CLERK OF COURT
CENTRE COUNTY, PA
COPY

**SECOND MOTION TO COMPEL COMMONWEALTH TO PROVIDE DEFENDANT
WITH REQUESTED PRE-TRIAL DISCOVERY MATERIALS**

TO THE HONORABLE JOHN M. CLELAND, SENIOR JUDGE SPECIALLY ASSIGNED
TO THESE MATTERS 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. On or about November 5, 2011, the Defendant was arrested in
Criminal Information No. CP-14-CR-2422-2011 by Cpl. Scott F. Rossman of the
Pennsylvania State Police, Avondale Barracks and Agent A.L. Sassano of the
Pennsylvania Office of Attorney General and charged with various offenses stemming
from conduct which allegedly occurred on diverse dates between January 1994 and
December 2008, in College Township, Centre County, Pennsylvania and various other
locations.

2. On or about December 7, 2011, the Defendant was arrested in
Criminal Information No. CP-14-CR-2421-2011 by Trooper Robert Yakicic of the
Pennsylvania State Police, Bureau of Criminal Investigations, and Agent A.L. Sassano of

the Pennsylvania Office of Attorney General, and charged with additional offenses stemming from conduct which allegedly occurred on or about January 1997 to December 2008 in College Township, Centre County, Pennsylvania and various other locations.

3. On December 13, 2011, the Defendant waived his preliminary hearing in this matter, and thereafter waived his arraignment on January 11, 2012.

4. The Defendant timely requested pre-trial discovery materials from the Commonwealth attorneys by correspondence dated December 29, 2011 entitled "Defendant's First Request for Pre-Trial Discovery".

5. The Commonwealth provided pre-trial discovery materials to Defendant's counsel on or about January 17, 2012 and January 23, 2012.

6. Pursuant to a previous motion to compel the Commonwealth to provide Defendant with requested pre-trial discovery materials dated on or about February 6, 2012, a hearing was held before this Honorable Court on or about February 10, 2012 after which the Court directed the Commonwealth to provide the Defendant with certain additional discovery materials.

7. To date, while the Commonwealth has provided the Defendant with certain of those discovery materials, the Commonwealth has failed to provide the Defendant with certain other discovery materials.

8. To date, the Defendant has made thirty-six (36) discovery requests to the Commonwealth.

9. In reviewing the aforementioned thirty-six (36) discovery requests made by the Defendant to the Commonwealth, Defendant and counsel have determined

The following materials, reports and information have not been provided to the Defendant by the Commonwealth:

a. December 29, 2011, First Request for Pre-Trial

Discovery.¹ With the exception of receiving arrest records pertaining to Accuser/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as requested in Paragraph Nos. 1 and 2g, psychiatric records from Dr. John Seasock and Dr. Alicia Chambers as requested in Paragraph No. 2k, the information requested in Paragraph Nos. 4, 5, 6, 7b and 19 as well as receipt of non-redacted discovery materials provide to the Defendant on March 7, 2012, the Commonwealth has not provided the Defendant with much of the information requested in Paragraph Nos. 2a, b, c, d, e, f, h, i, j and l; 3, 7(a), 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 and 18 as well as those items which the Commonwealth has indicated are protected as part of the Grand Jury investigation or those items which the Commonwealth has indicated are protected by the ongoing "continuing investigation" of Pages 62, 87, 186-188, 194-199, 208-210, 212-214 and 222-223 as requested in the Defendant's first request for pre-trial discovery. The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his request contained in Defendant's First Request for Pre-Trial Discovery material along with all supplemental reports and attachments related thereto.

¹ A copy of Defendant's First Discovery Request has been marked as Exhibit "A", attached hereto, and incorporated herein by reference.

b. February 6, 2011, Second Request for Pre-Trial

Discovery:² With the exception of receiving some of the former addresses and telephone numbers associated with Accusers/Alleged Victims 1, 3, 5, 6, 7, 9 and 10, the Defendant has not received in its entirety the information requested in Paragraph Nos. 20 and 21. The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his request contained in Defendant's Second Request for Pre-Trial Discovery material along with all supplemental reports and attachments related thereto.

c. February 15, 2012, Third Request for Pre-Trial

Discovery:³ With the exception providing the Defendant with the requested information in Paragraph No. 22, which was a previously redacted page from the initial discovery provided by the Commonwealth and copies of redacted materials in Attorney General Supplemental Report Nos. 2, 5, 8, 9, 10, 20, 22, 23, 24 Page 2 of 28 w/attachments, 31, 32, 34, 35, 36, 38 through 47, 49, 51 through 58 and 60 through 65 from PSP Incident Report No. G07-11461135, the Commonwealth has not provided the Defendant with much of the information requested in Paragraph Nos. 23, 24 and 25. The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his

² A copy of Defendant's Second Supplemental Discovery Request has been marked as Exhibit "B", attached hereto, and incorporated herein by reference.

³ A copy of Defendant's Third Supplemental Discovery Request has been marked as Exhibit "C", attached hereto, and incorporated herein by reference.

request contained in Defendant's Third Request for Pre-Trial Discovery material along with all supplemental reports and attachments related thereto.

d. **March 12, 2012, Fourth Request for Pre-Trial Discovery:**⁴

The Defendant has not received the information requested in Paragraph Nos. 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39 and 40. The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his request contained in Defendant's Fourth Request for Pre-Trial Discovery material along with all supplemental reports and attachments related thereto.

e. **March 12, 2012, Fifth Supplemental Discovery Request Based Upon the Commonwealth's Response to Defendant's Request for Bill of Particulars dated February 21, 2012:**⁵

The Defendant has not received the information requested in Paragraph Nos. 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58 and 59. The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his request contained in Defendant's Fifth Supplemental Discovery Request along with all supplemental reports and attachments related thereto.

f. **March 21, 2012, Sixth Supplemental Discovery Request Based Upon Commonwealth's Response to Order of Court Directing Pre-Trial**

⁴ A copy of Defendant's Fourth Supplemental Discovery Request has been marked as Exhibit "D", attached hereto, and incorporated herein by reference.

⁵ A copy of Defendant's Fifth Supplemental Discovery Request has been marked as Exhibit "E", attached hereto, and incorporated herein by reference.

Discovery Dated February 29, 2012.⁶ The Defendant has not received the information requested in Paragraph Nos. 60, 61, 62, 63, 64, 65, 66, 67, 68, 69 and 70.

The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his request contained in Defendant's Sixth Supplemental Discovery Request along with all supplemental reports attachments related thereto.

g. March 27, 2012, Seventh Supplemental Discovery Request Based Upon Office of Attorney General's Discovery Response Dated March 12, 2012:⁷ The Defendant has not received the information requested in Paragraph Nos. 86, 87, 88, 89, 90, 91, 92, 93, 94, 95 and 96. The Defendant is asking the Court to enter an Order directing the Commonwealth to provide Defendant's counsel with full, complete, and non-redacted copies of these materials pursuant to his request contained in Defendant's Seventh Supplemental Discovery Request along with all supplemental reports attachments related thereto.

h. All the remaining Eighth through Thirty-Third Supplemental Discovery requests have not been addressed by the Office of Attorney General.⁸

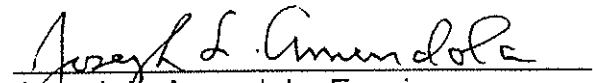
⁶ A copy of Defendant's Sixth Supplemental Discovery Request has been marked as Exhibit "F", attached hereto, and incorporated herein by reference.

⁷ A copy of Defendant's Seventh Supplemental Discovery Request has been marked as Exhibit "G", attached hereto, and incorporated herein by reference.

⁸ Copies of Defendant's Eighth through Thirty-Sixth Supplemental Discovery Requests have been marked as Exhibit "H", attached hereto, and incorporated herein by reference. The Defendant acknowledges that on April 30, 2012, the Commonwealth provided Defendant's counsel with additional discovery materials which counsel had not had an opportunity to review prior to the filing of Defendant's Second Motion to Compel Discovery. The Defendant presumes the additional discovery materials provided to his counsel on April 30, 2012 may make certain portions of his Second Motion to Compel Discovery moot regarding the over thirty (30) discovery requests made by the Defendant to the Commonwealth over the past five (5) weeks. The Defendant submits, however, that, prior to receiving the discovery materials on April 30, 2012, neither he nor counsel had received additional discovery materials requested in his Seventh through Thirty-Sixth Supplemental Discovery Requests since March 27, 2012.

WHEREFORE, the Defendant submits the above-requested information is critical to the preparation of his defense and respectfully requests this Honorable Court to enter an Order directing the Commonwealth to provide the Defendant with the requested discovery materials forthwith so that he may properly prepare for trial.

Respectfully submitted,


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

Date: May 3, 2012

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

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December 29, 2011

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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 First Request for Pre-Trial Discovery

Dear Joe and Jonelle:

This office represents the named Defendant in the above-captioned criminal action, and, on her behalf, and 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, 10L. Ed. 2d 215 (1963), hereby requests disclosure of the following items and information material to our client's case:

1. Copies of all informations and citations issued in conjunction with this case;

2. any evidence favorable to the accused which is material either to guilt or to punishment and which is within the possession or control of the attorney for the Commonwealth or any agent for the Commonwealth or which could be discovered by it by the exercise on its part of due diligence including, but not limited to the following:

a. Any and all evidence that the Defendant was not involved in the acts which gave rise to the allegations in the information(s) herein;

b. Any and all statements, reports, summaries, communications, notes, memoranda or the like of any officer, or other individual having any knowledge of the facts of this case, or having any relation to this case when such indicate that the

Defendant was not involved in any of the events alleged to have occurred in the allegations or the information(s);

c. The names and addresses of all persons during the investigation of this case who have been offered immunity, favorable consideration, less pleas or other agreements, for themselves or for others in return for testimony, information or documents;

d. Any and all consideration or promises of consideration given to or made on behalf of any intended witnesses or informant or any benefit expected or hoped for by the witness or informant. By "consideration" the Defendant refers to absolutely anything, formal or informal, direct or indirect, whether bargained for or not, which arguably could be of value or use to a witness or to persons of concern to the witness, including but not limited to leniency, favorable treatment or recommendations or other assistance with respect to any pending action or potential action including but not limited to criminal, parole, probation, pardon, clemency, civil, relief from forfeiture, payments of money, rewards or fees, witness fees and special witness fees, any promises to bring a witness' testimony or cooperation with the Commonwealth to the attention of a court or any other entity in any jurisdiction even if no specific agreement was made between the witness and the Commonwealth and anything else which arguably could reveal an interest, motive or bias in the witness or informant in favor of the prosecution or against the defense or which acts as an inducement to testify or to color testimony in this case;

e. Any threats of or criminal prosecutions, investigations, or potential prosecutions which could be brought against any witness or informant or custodial status of a witness or informant or any other transactions over which the Commonwealth has real, apparent or perceived influence;

f. The existence and identification of each occasion during which any intended Commonwealth witnesses or informant has testified before any court, tribunal or otherwise officially narrated testimony in relation to the Defendant, the investigation or the facts of this case;

g. The records pertaining to the criminal activity, arrest, and/or conviction of any and all witnesses whom the Commonwealth intends to call during the course of this case;

h. Any evidence which would tend to undermine the credibility of prosecution witnesses; including but not limited to the names of any witness or witnesses who have testified either falsely or erroneously, or whether any disciplinary investigations or internal affairs investigations have occurred;

i. The names and addresses of all potential wrongdoers in the incidents which gave rise to this prosecution;

j. Any and all evidence which the Commonwealth has in its possession, custody, control or which could be discovered by it by the exercise on its part of due diligence which arguably conflicts with the prosecution's theory of the case or the expected testimony of any one or more of its witnesses;

k. Any and all evidence in the possession, custody or control of the Commonwealth or which would become available which is arguably favorable or helpful to the defense, including but not limited to, any evidence that is impeachment evidence in regards to any Commonwealth witness; The criminal records, extent of drug or alcohol abuse, past and present and extent of any psychiatric records, past and present;

l. Informal, direct or indirect, of any witnesses whom the Commonwealth intends to call to prove its case in chief or rebuttal or for any other purposes as known or by the exercise of due diligence can become known to the Commonwealth.

3. The names and addresses and written or recorded statements or summaries of oral statements of all individuals whom the Commonwealth or its agents (whether the Commonwealth intends to call the individual as a witness in the case or not) have interviewed;

4. Any written confession or statement of the Defendant or the substance of any oral confession or statement and the identity of the person to whom the confession or exculpatory statement was made which is in the possession or control of the attorney for the Commonwealth or which by the exercise of due diligence may become known to the Commonwealth;

5. The Defendant's prior criminal record; including but not limited to a printout or list of the Defendant's local record created or generated by the District Attorney's Office and which the Commonwealth intends to use at sentencing;

6. The circumstances and results of any identification of the Defendant by voice, photograph, video surveillance or in-person identification;

7. Any and all scientific reports, the results of the analysis or examinations conducted on any specimens or objects or upon the Defendant herself regardless of the location of the specimens examined or the process by which they were obtained for analysis, including but not limited to the following:

a. Fingerprint identification, handwriting analysis, voiceprint analysis, ballistic examination, gunshot or gun powder residue test, bullet identification test, psychiatric and psychological

examinations of all Commonwealth witness, firearm identification, microbiological analysis of hair and blood, DNA analysis, polygraph examinations, and autopsy reports;

b. A list and diagram of the location or locations of each object or specimen of physical evidence recovered or found and from whom it was taken or received before being taken into custody by any Commonwealth agent, police officer, any agent of the police or any other investigator and which was submitted for examination; specifically the precise location where latent fingerprints, cartridge cases, spent bullets and/or impressions trajectories thereof were found;

8. Any tangible objects, including but not limited to, documents photographs, fingerprints, charts, diagrams, videotapes or any other tangible evidence;

9. The names and addresses of eyewitnesses and all investigation officials and agents and any evidence reflecting adversely on the credibility of any Commonwealth witness, including but not limited to, results of mental examinations or prior criminal records. In addition, if the testimony of any witness whom the Commonwealth intends to call has been refreshed or enhanced through hypnosis or any other psychological technique;

10. The names and addresses and all written or recorded statements and substantially verbatim oral statements and the substance of proposed testimony of witnesses the Commonwealth intends to call at trial, including but not limited to Victim Impact Statements;

11. A copy of the complete police report of investigation in its undeleted form and all supplemental reports;

12. All written or recorded statements, and substantially verbatim oral statements of eyewitnesses the Commonwealth intends to call at trial, including but not limited to, statements made to any member of the prosecutor's office, any police officer or other law enforcement agent during the investigation which preceded or followed the arrest herein;

13. All written or recorded statements and substantially verbatim oral statements made by accomplices, if any, whether such individuals have been charged or not;

14. The names and addresses of any persons who have retracted or deviated from statements made to any agent of the Commonwealth investigating or assisting in the investigation into the incident;

15. Any other evidence, the disclosure of which is in the interest of justice and/or might be deemed exculpatory;

16. Copies of all medical/psychological records/examinations and all other materials related to the accusers, which the Commonwealth has referred to as Victim Nos. 1 through 10 inclusive, which were conducted pursuant to the investigation and/or allegations related to the charges filed against the Defendant in this matter;

17. Copies of the accusers'/also referred to as Victim Nos. 1 through 10 inclusive by the Commonwealth and any other non-law enforcement Commonwealth witnesses', phone, text, emails and all other electronic communications as well as the substance of all texts and emails made between the accusers/alleged victims and the Defendant between November 1, 2008 and December 29, 2011 having anything to do with contact with the Defendant and/or with each other;

18. Copies of all transcripts of testimony by all individuals who appeared before the investigating Grand Jury between 2008 and December 29, 2011 in this matter;

19. Copies of all materials taken from the Defendant's home as a result of the execution of a search warrant on or about June 21, 2011.

These 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, thereby its disclosure is in the interests of justice. Your prompt attention to this matter is greatly appreciated.

Truly,

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

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

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February 6, 2012

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In Re: Commonwealth vs. Gerald Sandusky
Defendant's Second Request for Pre-Trial Discovery

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 request disclosure of the following items and information material to our client's cases:

20. The dates of birth and addresses as well as all telephone numbers maintained by the ten (10) accusers/alleged victims in the Defendant's cases for the period between September 1, 2008 and February 6, 2012;

21. The names, addresses, and telephone numbers for all other witnesses who were interviewed by law enforcement officers in regard to the Defendant's cases between September 1, 2008 and February 6, 2012.

These 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".

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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February 15, 2012

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Harrisburg, PA 17120

In Re: Commonwealth vs. Gerald Sandusky
Defendant's Third Request for Pre-Trial Discovery

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 supplemental request for disclosure of the following items and information material to our client's cases:

22. Please provide a non-redacted copy of Page 227 which was omitted from the Commonwealth's discovery materials previously provided;

23. Please provide non-redacted copies of PSP Incident Report No. G07-11461135, Attorney General Supplemental Report Nos. 2, 5, 8, 9, 10, 20, 22, 23, 24 (Page 2 of 2), 28 (with attachments), 31, 32, 34, 35, 36, 38-47, 49, 51-58 and 60-65 as well as any reports numbered after Attorney General Supplemental Report No. 66;

24. Please provide non-redacted copies of all investigative report(s), supplemental reports for the accuser/alleged Victim 8 as prepared by the Pennsylvania State Police, the Office of Attorney General and/or other law enforcement agency within the Commonwealth of Pennsylvania to include federal/township/borough/Sheriff law enforcement agencies;

25. Please provide non-redacted copies of all Pennsylvania State Police investigative report(s), supplemental investigative reports all investigative reports for accuser/alleged Victim 10 to include all interviews that were

written/typed and signed by accuser/alleged Victim 10 as well as video recorded interviews, CYS reports, education records/medical reports and/or all other documents/records/ records contained within the investigative files of the Pennsylvania State Police/the Office of Attorney General.

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', written over the printed name.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

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March 12, 2012

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In Re: Commonwealth vs. Gerald Sandusky
Defendant's Fourth Request for Pre-Trial Discovery

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 supplemental request for disclosure of the following items and information material to our client's cases:

26. Please provide non-redacted copies of all medical records to include family medical providers, specialty physicians, psychiatric records that were provided by the accusers/alleged victims to either the Office of Attorney General/the Pennsylvania State Police in regard to Accusers/alleged Victims 1 through 10;

27. Please provide non-redacted copies of the same medical provider records that were obtained from serving a subpoena and/or search warrant in this investigation in regard to Accusers/alleged Victims 1 through 10;

28. Please provide unaltered and non-redacted copies of all video with audio and taped interviews of Accusers/alleged Victims 1 through 10 conducted by the Office of Attorney General, the Pennsylvania State Police, or outside vendor (expert) retained by either the Office of Attorney General or the Pennsylvania State Police who by means of this task assisted Accusers/alleged Victims 1 through 10 with assisting in their anticipated trial testimony; further, this request shall include any and all future activities of this nature in preparation for trial;

29. Please provide non-redacted copies of all current and past employment records either provided or obtained through use of subpoena(s) and/or search warrant(s) that described Accusers'/alleged Victims' 1 through 10 employment histories free of redactions;

30. Please provide non-redacted copies of all criminal history profiles obtained by the Office of Attorney General/the Pennsylvania State Police from any and all computer-based searches to include NCIC, CLEAN, federal, state, county, sheriff and local law enforcement agencies for Accusers/alleged Victims 1 through 10;

31. Please provide unaltered and non-redacted copies of complete records and recordings identifying Attorney General personnel, Pennsylvania State Police and/or outside vendors who were retained to put Accusers/alleged Victims 1 through 10 through a mock trial/practice that simulated the Office of Attorney General questioning the accusers/alleged victims as well as attorneys who simulated the defense in cross examination based upon the initial practice testimony which shall be free of any redactions or audio deletions, and shall include the actual names of the Office Attorney General personnel who will be present at the Defendant's trial;

32. As part of continuous discovery, please provide unaltered or non-redacted copies of complete records/documentation of any and all testimony by Accusers/alleged Victims 1 through 10 before a mock jury/review/analysis by the participants on the jury as well as any recommendations for improvement by any person/expert/jury member so as to enhance the testimony of the accuser;

33. Please provide non-redacted copies of any and all reports and documents obtained from a jury consultant or jury consultant agency that identifies what type individual would more than likely vote guilty based upon the Office of Attorney General's case in chief to include any demographic reports, likely jury member's age/sex, jury make-up, type of employment the jury member may have that would tend to cause their vote of guilty as well any and all documents provided by the consultant that includes method and manner of questions for potential jury members that would give indications about their intent to vote guilty versus not guilty;

34. As part of continuous discovery, identify the full names and address of jury consultant(s) and firm(s) that have been retained and/or anticipated being retained by the Office of Attorney General for the purpose of being present for the actual jury selection;

35. Please provide non-redacted copies of any and all records, files, documents, and reports that were provided by the Office of Attorney

General/the Pennsylvania State Police to any civil attorney or civil law firm who has indicated through correspondence or other documentation that the attorney and/or firm represents Accusers/alleged Victims 1 through 10;

36. As part of continuous discovery from the subpoena date, please provide non-redacted copies of any and all records, files, reports that were given to the Office of Attorney General or the Pennsylvania State Police by legal counsel for Accusers/alleged Victims 1 through 10;

37. Please provide non-redacted copies of any and all computer system-based records from the Office of Student Conduct or any other University office within The Pennsylvania State University through the Office of Vice-President/Chief Counsel Cynthia Baldwin, Esquire that was either obtained through use of a subpoena or search warrant;

38. Please provide non-redacted copies of any and all records received from The Pennsylvania State University Board of Trustees that were obtained through use of a subpoena or search warrant;

39. Please provide non-redacted copies of any and all media reports to include television, radio and print from newspapers that were obtained through a subpoena or search warrant that details any information that pertains to this case;

40. Please provide non-redacted copies of any and all records regarding Accusers/alleged Victims 1 through 10 that include crimes of moral turpitude, perjury or false reports to any law enforcement agency, any fabrication of physical evidence or testimony that the accuser was not prosecuted for but the records exist that were obtained through use of a search warrant or subpoena.

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

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March 12, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Fifth Supplemental Discovery Request Based Upon
The Commonwealth's Response to Defendant's Request for Bill
Of Particulars dated February 21, 2012.**

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 supplemental request for disclosure of the following items and information material to our client's cases:

41. Accuser/alleged Victim 1:

- a. Identify the State College hotel as described in the Commonwealth's Bill of Particulars dated February 21, 2012 subsection a;
- b. Provide copies of any and all records and information obtained from the hotel either by search warrant and/or subpoena regarding this matter to include but not limited to employee/management personnel interviews of current and past employees, copies of hotel financial and registration records, all records/files obtained from the hotel's corporate headquarters and/or any and all pictures and video recordings obtained from the hotel, its corporate headquarters, security video management and/or private vender who installed and maintained all security video;
- c. Identify the school attended as described in subsection a of the Commonwealth's Bill of Particulars dated February 21, 2012;

d. Provide copies of all investigative reports, records and files prepared by agents of the Office of Attorney General and the Pennsylvania State Police in their efforts that establish the exact times and dates;

e. Provide copies of all interview documents, records, files, videos with audio, as well as any recorded interviews that were conducted with "child" by agents of the Office of Attorney General and the Pennsylvania State Police as they relate to this investigation;

f. Provide copies of all reports, documents, records and files obtained from the "school" as described in the Attorney General's response for Bill of Particulars;

g. Provide copies of all Children and Youth Service's records from the county CYs office of record based upon the stated alleged incident;

h. Provide copies of all medical, psychiatric and psychological records along with the medical provider who completed the evaluation of "child" that were obtained from the "child" or his parent/guardian by use of subpoena and/or search warrant;

i. Provide copies of all written, typed and/or video with audio interviews of the "child" by the agents of the Office of Attorney General Agents and/or Pennsylvania State Police, CYs personnel, outside vendor(s) employed by a CYs agency, the Attorney General's Office, the Pennsylvania State Police where the "child" indicated that the written, oral, recorded statements were true and correct to the best of the "child's" knowledge and belief;

j. Provide copies of all investigative documents that support, in any way, the claim that the unknown offenses occurred between calendar years 2005-2008.

42. Accuser/alleged Victim 2:

a. Provide copies of any and all documents regarding investigative measures taken by agents of the Office of Attorney General and/or the Pennsylvania State Police investigators assigned to investigate the series of events that were utilized to identify Accuser/alleged Victim 2;

b. Provide copies of any and all interviews by the respective agencies above of any individual including school personnel and potential witnesses;

c. Provide copies of any and all records, documents, files and reports obtained through use of a search warrant and/or subpoena in this matter;

d. Provide all investigative steps taken with reports, etc. since the Attorney General's initial response to Defendant's pretrial discovery requests;

43. Accuser/alleged Victim 3:

a. Provide copies of all investigative reports, files, records, and/or documents received from the Pennsylvania State University regarding this specific incident that has been alleged to have occurred between calendar years 2000 and late 2002 by use of subpoena and/or search warrant;

b. Provide copies of all interviews from current and past Pennsylvania State University personnel and/or students who were in any way contacted by investigators from the Office of Attorney General/the Pennsylvania State Police to seek out potential observers of the alleged conduct and or verification that person(s) within the investigation of Accuser/alleged Victim 3 were in fact present at the time intervals as described in the Commonwealth's Bill of Particulars dated February 21, 2012 subsections a through c;

c. Provide copies of any and all medical, psychiatric and psychological records for Accuser/alleged Victim 3 obtained from the "child" by use of a subpoena and/or search warrant to include copies of counseling records before or after alleged incident as well as any current medical, psychiatric or psychological records;

d. Provide copies of all CYS reports for the county of record that were obtained by use of a subpoena and/or search warrant, or provided by the CYS agency with no Court mandated order (subpoena and/or search warrant);

e. Provide copies of all video and audio interviews of the "child" by agents of the Office of Attorney General or Pennsylvania State Police;

f. Provide copies of any records reflecting the "child" in any way stated the occurrences described in the Commonwealth's Bill of Particulars dated February 21, 2012 are true and correct to the best of the "child's" knowledge and belief;

g. Provide copies of all incident and investigative reports, files, documents, or other printed material not included in Commonwealth's Bill of Particulars dated February 21, 2012 in response to Defendant's pretrial discovery requests.

44. Accuser/alleged Victim 4:

a. Provide copies of all records obtained from the Toftrees Golf Resort as obtained from use of a subpoena and/or search warrant regarding this matter to include interviews with current and past employees of the Resort;

b. Provide copies of all records, files, reports, documents, video, and/or pictures received from the Pennsylvania State University regarding entry into and/or being at or about the following locations within the PSU campus:

1) East Area Locker Rooms;
2) Various dormitories of the Pennsylvania University, University Park Campus, as well as the actual identification of the specific name of the dormitories;

3) Current and past PSU employees' and students' interviews, who worked or resided at the unidentified dormitories, that were conducted by members of the Attorney General's Office, the Pennsylvania State Police and/or the Office of Public Safety at the Pennsylvania State University that were provided by a subpoena and/or search warrant;

4) Entry records/logs as kept and maintained by the Pennsylvania State University, University Park Campus, for entry into the unknown dormitories from 1996 through to the present.

c. Provide copies of all federal, state, city, county, sheriff and local law enforcement agency reports, records, files and documents that allowed the Office of Attorney General to announce, prepare and submit its response to Defendant's Bill of Particulars dated February 21, 2012, filed on March 1, 2012, stating that information is known to exist that alleged crimes were committed by the Defendant in the states of Florida and Texas;

d. Provide copies of all video and recorded interviews conducted by the Office of Attorney General and the Pennsylvania State Police with Accuser/alleged Victim 4 regarding allegations in this matter to include all allegations that occurred in the states of Texas and Florida.

e. Provide copies of all video and recorded interviews of the "child" that were conducted by Florida and Texas law enforcement officials who traveled to the Commonwealth for the explicit purpose of interviewing the "child" in this matter as well as any recordings or videos of interviews conducted out of the state by law enforcement;

f. Provide copies of all CYS reports, records, files and documents obtained from the Pennsylvania State Police or the Office of Attorney General by means of a subpoena and/or search warrant in regard to Accuser/alleged Victim 4;

g. Copies of all medical, psychiatric and psychological reports obtained regarding the "child" received from the CYS Office of record, the "child" or from any and all medical providers in this matter by use of a subpoena and/or search warrant;

h. Copies of all documents, reports, records, files or specific paperwork in the possession of the Pennsylvania State Police and/or the Office of Attorney General that, by means of time and date of receipt, were not provided in defense counsel's request for informal pretrial discovery at various stages of the case.

45. Accuser/Alleged Victim 5:

- a. Provide copies of all documents, records, files and reports obtained from The Pennsylvania State University including the Office of Public Safety for The Pennsylvania State University regarding this matter obtained via subpoena and/or search warrant;
- b. Provide copies of any and all CYS reports regarding this matter that were obtained by use of a subpoena and/or search warrant;
- c. Provide copies of all medical, psychiatric and psychological records regarding this "child" that were provided to the Office of Attorney General or the Pennsylvania State Police by CYS, the "child" or by means of a subpoena and/or search warrant;
- d. Provide copies of all interviews conducted with the "child" by members of the Office of Attorney General or the Pennsylvania State Police wherein the "child" stated the facts as presented in the Commonwealth's Bill of Particulars dated February 21, 2012 as true and correct to the best of the "child's" knowledge and belief;
- e. Provide copies of all interviews of current and past employees and students of The Pennsylvania State University to establish a actual witness timeline or other investigative aid in this matter;
- f. Provide copies of any files, records, documents and reports prepared and maintained by members of The Pennsylvania State Police and the Office of Attorney General not already provided upon Defendant's request for pretrial discovery.

46. Accuser/alleged Victim 6:

- a. Provide copies of all subsequent interviews of individuals outside of the initial alleged observation by a known individual regarding this matter;
- b. Provide copies of all records, documents, files and computer-related information regarding this matter as received from The Pennsylvania State University by means of a subpoena and/or search warrant;
- c. Provide copies of all Pennsylvania State Police and Office of Attorney General records that include interviews, review records or other investigative means to identify this unknown eleven year old minor;
- d. Provide copies of all related material, records, files, documents and reports that, through receipt by the Office of Attorney General, have yet to be provided by informal discovery to defense counsel.

47. Accuser/alleged Victim 7:

- a. Provide copies of all records, documents, files, and computer-generated information from The Pennsylvania State University

regarding this matter that were obtained by means of a subpoena and/or search warrant;

b. Provide copies of all CYS records obtained in this matter from the respective CYS office to include all medical, psychiatric and psychological reports regarding this individual;

c. Provide copies of all medical, psychiatric and psychological reports received by means of a subpoena and/or search warrant or provided by the "child";

d. Provide copies of all interviews conducted by the Office of Attorney General and the Pennsylvania State Police of the "child" to include written, audio recordings, videos with sound as kept and maintained by the Office of Attorney General or the Pennsylvania State Police;

e. Provide copies of any and all criminal records to include records of detentions in any jails/centers of this "child".

48. Accuser/alleged Victim 8:

a. Provide copies of all The Pennsylvania State University, University Park Campus, records obtained from this incident by means of a subpoena and/or search warrant;

b. Provide copies of all The Pennsylvania State University Office of Public Safety investigations into this matter as provided by the Office of Public Safety by means of subpoena and/or search warrant or provided by written or oral request;

c. Provide copies of all interviews by the Pennsylvania State Police and Office of Attorney General of all former and current PSU employees, student employees, or other individuals that verify what a known person indicated they saw or observed "on a Thursday or Friday evening in November of 2000";

d. Provide copies of all medical reports regarding this individual's general health, etc. with the utmost care for HIPPA regulations being utilized to keep the person's identity and address as unknown - defense counsel will stipulate to the name and address of the individual and only seeks copies of current medical records;

e. Provide copies of any and all investigative measures taken by members of the Office of Attorney General and Pennsylvania State Police investigators employed to identify this person to include interviews of any and all persons by use of video that captured persons' general face appearance.

49. Accuser/alleged Victim 9:

a. Provide copies of all records received from current or former Hilton Garden Inn of State College employees pertaining to this matter by means of interviews or review of Inn documents;

b. Provide copies of all registration documents from the Hilton Garden Inn of State College as well as the corporate headquarters regarding registration information from calendar years 2005 through 2009 regarding this information obtained by means of a subpoena and/or search warrant;

c. Provide copies of all CYS records received by the Office of Attorney General or the Pennsylvania State Police obtained by use of a subpoena and/or search warrant regarding this matter to include psychiatric and psychological records;

d. Provide copies of all records, documents, files, and reports not already provided by means of informal discovery.

50. Accuser/alleged Victim 10:

a. Provide copies of all records, documents, reports and files, or other related material, by use of a subpoena and/or search warrant upon The Pennsylvania State University, University Park Campus, that would include reports from the Office of Public Safety regarding this matter;

b. Provide copies of all medical, psychiatric and psychological reports obtained by a subpoena, search warrant or by the Accuser/alleged Victim 10;

c. Provide copies of all CYS reports obtained in this matter by means of a subpoena and/or search warrant;

d. Provide copies of all records, documents, files, and reports not already provided by means of informal discovery.

51. Provide copies of all criminal records with final disposition as well as ORI contributor and county of record(s) for Accusers/alleged Victims 1 through 10;

52. Provide copies of all records of court ordered/directed incarceration for specific crimes from a sentence from the court of record(s) for Accusers/alleged Victims 1 through 10;

53. Provide copies of all records of periods of incarceration pending bail/release from arrest prior to the final resolution of the crime;

54. Provide copies of driver records from the Secretary of Transportation, Commonwealth of Pennsylvania, with seal of certification to records being true/accurate for Accusers/alleged Victims 1 through 10;

55. Provide copies of all high school/college records as kept and maintained by the Office of Attorney General or Pennsylvania State Police;

56. Provide copies of all other records, documents, files and reports regardless of the source obtained by the Office of Attorney General by means of a subpoena and/or search warrant for Accusers/alleged Victims 1 through 10 in this matter;

57. Provide copies of a check of the NCIC/CLEAN and J-NET Data Base for each accuser/alleged victim with records of any and all contributors to the data base(s) in this matter;

58. Provide copies of all medical, psychiatric and psychological examination records conducted by members of the Office of Attorney General, the Pennsylvania State Police or by person(s) employed by the Commonwealth of Pennsylvania, any outside vendor so retained by the Commonwealth of Pennsylvania or the Office of Attorney General to include all interviews, testing, and evaluations conducted by an agency who specializes in the treatment of alleged sexual misconduct in regard to Accusers/alleged Victims 1 through 10;

59. Provide all pages of non-redacted copies of all psychological testing and related medical information for Accusers/alleged Victims 1 through 10 which shall contain the following:

a. Diagnostic Impression for Axis I/II/III/IV and V for each assessment completed;

b. Any psychological/psychiatric testing and results to include the names of the tests; any and all assessments and reports to include any and all background information, diagnoses and recommendations resulting from the testing and assessments completed;

c. All behavior issues, incidents and reports that were generated from all home, community and school settings that were contained in CYS reports/school reports and/or other reporting documents contained within school/CYS documents;

d. All reports from schools and law enforcement agencies regarding whether Accusers/alleged Victims 1 through 10 filed complaints against others whether the report(s) was founded or unfounded;

e. This request shall include all documents received from the Accusers/alleged Victims 1 through 10 on a voluntary basis, through use of subpoena and/or search warrant, provided by any authorized person/agency, or any other service provider that were involved in behavioral or mental health issues or problems that occurred in a school, home or community setting;

f. Identify any and all agencies, service providers or individuals who were involved in behavioral or mental health issues involving the Accusers/alleged Victims 1 through 10 which shall include documents received from CYS, schools, agencies, service providers, home or any community entities that the Office of Attorney General or the Pennsylvania State Police

obtained records through any means that would result in the documents/records/files/reports and incident investigations being provided;

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 Sixth Supplemental Discovery Request Based Upon
Commonwealth's Response to Order of court Directing Pretrial
Discovery Dated February 29, 2012**

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 sixth supplemental request for disclosure of the following items and information material to our client's cases:

60. Pennsylvania Attorney General Investigation and Drug Control Investigative Report titled Supplemental Report No.9 contained within Paragraph No.4 describes a 1998 report that was titled "Administrative Report"-vs- "Sexual Assault". Based upon this information the following non-redacted copies of records/documents/files/tapes/recorded statements with transcript and Penn State University Police Department investigative reports are requested:

- a. The entire 90 page report as described in Pennsylvania Attorney General Supplemental Report No. 9;
- b. All taped interviews with interview transcript attached;
- c. All CYS reports as referenced within Supplemental Report No. 9;
- d. All letters/documents/directives received from the Centre County District Attorney's Office;
- e. All records/documents/investigative reports/taped interviews and other relevant material provided to the Centre County District Attorney and/or Centre County CYS by the Penn State University

Police Department;

f. All records/documents/files/investigative reports/interviews recorded/or by video that are kept and maintained within the "Administrative File" that is kept and maintained by the Pennsylvania State University and or any office within the University;

g. All "Daily Logs" as kept and maintained within The Pennsylvania State University records systems to include the Penn State University Police Department that relate to this incident;

h. All records/files/investigative files/Penn State University Police Department records and/or any other document not so described within this discovery request.

61. Pennsylvania Attorney General Supplemental Report No. 33 prepared by S. A. Sassano describes documents contained within the Records Systems Management System No. 199800001609 as reported/prepared by Detective Schreffler. Please provide a non-redacted copy of this document with all attachments.

62. Page 216 of Pennsylvania State Police Incident No. G07-1146135 states Grand Jury Subpoena No. 520 was served upon the Chief Counsel's Office of The Pennsylvania State University Office of Chief Counsel/ Grand Jury Subpoena No. 521 being served upon the Second Mile. Please provide non-redacted copies of all records/documents/files obtained from the Pennsylvania State University/The Second Mile based upon the above described Subpoena Nos. 520 and 521.

63. Pennsylvania State Police Report No. F04-100091(PSP LAMAR) dated 12/12/08 prepared by Trooper Cavanaugh details under a list of attachments the following:

a. CYS 104 form dated November 21, 2008 and CYS Interview (disc). Please provide a non-redacted copy of both items above to include the transcript of the disc referenced by Trooper Cavanaugh;

b. Penn DOT records for the following OLN(s): 12547344, 19864431 and 21255778. Please provide non-redacted copies of all documents that relate to each OLN.

64. Pennsylvania State Police Incident Report No. G07-1146135 possibly Page No. 10 details an interview of an accuser/alleged victim prepared by Trooper Timothy Lear. Please provide a non-redacted copy of the following based upon this information:

a. All written/taped with transcript/video with transcript interview documents regarding Trooper Lear's interview;

b. Full name/address/telephone number of individual interviewed.

65. Pennsylvania State Police Incident No. G07-1146135 details interviews of a known accuser/alleged victim. Those being present were Mike Gillum/investigating trooper and the individual interviewed. Please provide non-redacted copies of the following information based upon the Report of Trooper Lear:

a. All interview documents to include taped/video with transcript of the interview;

b. Any/all records/documents/reports/medical reports provided by Mike Gillum - a counselor provided to the Pennsylvania State Police/Office of the Pennsylvania Attorney General by voluntary means/use of subpoena and or search warrant.

66. Pennsylvania State Police Incident No. G07-1146135, Page No. 48, details an interview of Dr. Alycia Anne Chambers, a psychologist who counseled a known accuser/alleged victim. The Pennsylvania State Trooper (Scott Rossman) describes being provided a copy of Dr. Chamber's counseling report. Please provide a complete non-redacted copy of the following based upon the report of Trooper Rossman:

a. Dr. Chamber's Counseling Report as obtained by Trooper Rossman from Dr. Chambers;

b. Any and all reports, documents, files, letters diagnosis(s) and testing completed by Dr. Chambers obtained from Dr. Chambers on or about 03/07/2011 regarding the known individual;

c. Any and all documents obtained from Dr. Chambers from 03/07/2011 by voluntary means and or use of subpoena/search warrant through to the present.

67. Pennsylvania State Police Incident Report No. G07-1146135, Page No.54, regarding an individual named Deb McCord. Please provide a complete and non-redacted copy of the text that is attached to the station copy of PSP Incident No. G07-1146135 as described in the incident report above sent by Sara Ganim to Deb McCord.

68. Pennsylvania State Police Incident No. G07-1146135, Page 134 describes a letter. Please provide a non-redacted copy of the letter so referenced within the incident report.

69. Pennsylvania State Police Incidents No. G07-1146135, Page 177, describes a subpoena being served upon The Pennsylvania State University -

Office of Chief Counsel for any and all information regarding Jerry Sandusky for calendar years 2002/2003. Please provide a complete and non-redacted copy of all records/documents/files/investigations and related information received from the issuance of the search warrant and service upon The Pennsylvania State University.

70. Pennsylvania State Police Incident Report No. G07-1146135, Page 185, details an initial investigation by the Pennsylvania State Police at the Montoursville Barracks prepared by Trooper Joseph Akers. Please provide a complete and non-redacted copy of the following information based upon the PSP initial investigation:

- a. Trooper Akers's initial investigation to include copies of an initial report as well as any and all supplemental reports;
- b. All video/audio recording and written statements obtained by Trooper Akers of the known individual as described within the report.

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 Seventh Supplemental Discovery Request Based
Upon Office of Attorney General's Discovery Response Dated
March 12, 2012**

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 seventh 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:

71. The DVD as stated on Page 248 of Pennsylvania State Police Incident No. G07-1146135 that was prepared by Trooper James P. Ellis which indicates that on 12/27/2011 agents obtained a DVD from David Woodle of the Second Mile;

72. The "handwritten" statement as stated on Page 251 of Pennsylvania State Police Incident No. G07-1146135 which details a "handwritten" statement obtained from Attorney Fleming from Michael McQueary;

73. The interview content as stated on Page 254 of Pennsylvania State Police Incident No. G07-1146135 which details the Office of Attorney General's interview with Cyrek Brandon Jackson being redacted;

74. Page 256 of Pennsylvania State Police Incident No. G07-1146135 which has a passage redacted;

75. The two (2) compact discs with video and audio as stated on Page 257 of Pennsylvania State Police Incident No. G07-1146135 wherein Trooper Ellis details the finding of two (2) compact discs with interviews by Pennsylvania State Police and Children and Youth Services;

76. Page 273 of Pennsylvania State Police Incident No. G07-1146135 which has the top portion of the document redacted;

77. Documents 1 through 9 as stated on Page 275 of Pennsylvania State Police No. G07-1146135 which details a "supervised review" of documents from the office of Joseph V. Paterno Sr. that were protected under a "police seal of evidence" and which the PSP report states Documents 1 through 9 were removed and copied;

78. The complete three-page report of Supplemental Report No. 71 for Pennsylvania Attorney General Report No. in which defense counsel only received printed Pages 1 and 2;

79. Page 2 of a two-page report identified as Supplemental Report No.78 of Pennsylvania Attorney General Report No. 63275;

80. Page 2 of a two-page report identified as Supplemental Report No. 79 of Pennsylvania Attorney General Report No. 63275;

81. Supplemental Report No. 80 of Pennsylvania Attorney General Report No, 632275;

82. Supplemental Report No. 81 of Pennsylvania Attorney General Report No.63275;

83. Supplemental Report No. 82 of Pennsylvania Attorney General Report No. 63275;

84. Supplemental Report No. 83 of Pennsylvania Attorney General Report No. 63275;

85. Supplemental Report No. 86 of Pennsylvania Attorney General Report No.63275;

86. Supplemental Report No. 87 of Pennsylvania Attorney General Report No.63275;

87. Supplemental Report No. 90 of Pennsylvania Attorney General Report No. 63275;

88. Supplemental Report No. 93 of Pennsylvania Attorney General Report No. 63275;

89. Supplemental Report No. 95 of Pennsylvania Attorney General Report No. 63275;

90. Supplement Report No. 122 of Pennsylvania Attorney General Report No. 63275;

91. Supplemental Report No. 123 of Pennsylvania Attorney General Report No. 63275.

92. Supplemental Report No. 124 of Pennsylvania Attorney General Report No. 63275;

93. Supplemental Report No. 125 of Pennsylvania Attorney General Report No. 63275;

94. Supplemental Report Nos. 127, 128 and 129 of Pennsylvania Attorney General Report No. 63275;

95. Supplemental Report No. 132 of Pennsylvania Attorney General Report No. 63275;

96. Supplemental Report No. 134 of Pennsylvania Attorney General Report No. 63275;


97. Supplemental Report No. 135 of Pennsylvania Attorney General Report No. 63275.

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 Eighth Supplemental Discovery Request.

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 an eighth 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:

98. Provide copies of any and all materials and information of all investigative steps taken by the Office of Attorney General, Commonwealth and the Pennsylvania State Police to identify Alleged Victim 2, specifically:

- a. All interview records of Michael McQueary wherein McQueary was shown development stages of males as a means of comparison from his observation of the minor boy versus the proposed age of the example based upon the male development cycle;
- b. Copies of any and all "line-up" documentation that shows the development of males that were shown Michael McQueary;
- c. Copies of all expert reports obtained based upon evidence obtained from interviews of Michael McQueary and/or any other potential witnesses that would provide a "proposed" age of the unknown Alleged Victim 2;
- d. Provide the full name, professional address and resume of any and all experts consulted regarding "age observations" by the Office of Attorney General, Commonwealth or the Pennsylvania State Police;

99. Provide copies of any and all materials and information of all investigative steps taken by the Office of Attorney General, Commonwealth and the Pennsylvania State Police to indentify Alleged Victim 8, specifically:

a. All interview records of witness wherein the witness was shown development stages of males as a means of comparison from his observation of the minor boy versus the proposed age of the example based upon the male development cycle;

b. Copies of any and all "line-up" documentation that shows the development of males that were shown the witness;

c. Copies of all expert reports obtained based upon evidence obtained from interviews of the witness and/or any other potential witnesses that would provide a "proposed" age of the unknown Alleged Victim 8;

d. Provide the full name, professional address and resume of any and all experts consulted regarding "age observations" by the Office of Attorney General, Commonwealth or the Pennsylvania State Police;

100. Provide all "expert" information that the Office of Attorney General or Commonwealth has available that will be presented in its case in chief or in rebuttal for the pending trial in this 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.

Truly,



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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Ninth Supplemental Discovery Request Based
Upon Multiple Interviews Conducted of Potential
Accusers/Victims by Law Enforcement Officials**

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 ninth 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:

101. Any and all interview reports, videos, transcripts, and recordings with transcripts conducted by agents of the Office of Attorney General or troopers with the Pennsylvania State Police in regard to multiple interviews conducted with Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10;

102. Any and all interview reports, videos, transcripts, and recordings with transcripts conducted by agents of the Office of Attorney General or troopers with the Pennsylvania State Police with any potential victims who were interviewed and indicated to multiple questionings that they had NOT been sexually assaulted by the Defendant specifically after being interviewed on numerous occasions after their first interview;

103. All interview reports, videos, transcripts, and recordings with transcripts conducted by agents/troopers on any individual who, at the original interview, indicated they had NOT been sexually assaulted by the Defendant, but that the individuals have since stated they had been sexually assaulted by the Defendant;

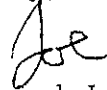
104. All investigative files, reports, supplemental reports, files, records, interviews including transcripts conducted along with the identification of the individual, complete day/date/times and location the alleged sexual assaults had occurred based upon an answer of "yes" they had been sexually assaulted by the Defendant including:

- a. Copies of all documented medical records that in any way support the sexual assault claim;
- b. Copies of all psychological/psychiatric testing completed at the request of the Office of Attorney General upon this person(s) who has come forward after initial denial;
- c. Copies of any and all names of any medical, psychological, psychiatric consulted that in any way assisted in interviews of any and all alleged accusers/alleged victims who have just recently stepped forward as a potential victim;
- d. The same information is requested for prior individuals who had stepped forward that are part of the criminal case now within the court of Centre County.

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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JOSEPH L. AMENDOLA

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March 28, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Tenth Supplemental Discovery Request**

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 tenth 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:

105. Copies of all reports, documents, records, files, interviews and related printed information prepared by the Pennsylvania State Police/the Office of Attorney General that in any way relate to the Gerald Sandusky investigation which were provided to the Freeh Group Investigative Agency to include the address the documents were mailed to or provided by courier.

106. Copies of all reports, documents, records, files, interviews and related printed information regarding the Freeh Investigative Group that was either provided to the Office of Attorney General/Pennsylvania State Police for the case file (Commonwealth v. Gerald A. Sandusky).

107. Provide all investigative reports/supplemental reports as prepared by any member of the Office of Attorney General/Pennsylvania State Police that resulted in further investigation by the Freeh Investigative Group in this matter which was a direct or indirect result of information provided by the Freeh Investigative Group to include copies of all written, taped or video interviews with transcript and/or disc.

108. Copy of the Central Mountain School District Investigation that was conducted after Accuser/Alleged Victim 1 filed a complaint of harassment/stalking which allegedly occurred on or about the school district property involving investigator Officer Brenden/Brendan Coleman/Coleman of the school district police department/office of public safety.

109. Copies of all investigative reports/supplemental reports prepared by the Office of Attorney General/Pennsylvania State Police resulting from any information received from any current "sitting" Grand Jury in this matter which relate to the Defendant.

110. Copies of any and all subsequent investigations by either the Pennsylvania State Police/the Office of Attorney General in this and/or related matters.

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 Eleventh Supplemental Discovery Request
Based Upon Commonwealth's Correspondence to Defense
Counsel Dated March 27, 2012 in Response to Judge Cleland's
Order dated March 20, 2012**

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 an eleventh 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:

111. In Paragraph No. 3, the Office of Attorney General indicated they have provided all known juvenile adjudication/adult arrest records for Accusers/Alleged Victims 1 through 10. Please describe the database searches conducted, the agencies contacted, as well as any other investigative measures conducted to identify all known juvenile adjudications/adult arrests in which there was a final disposition in the case(s) that have been reviewed by the Office of Attorney General agents or the Pennsylvania State Police in this matter.

112. In Paragraph No. 4, Subsections a, b, c, d, e, f, g, and h, the Office of Attorney General provided addresses and "present" telephone numbers for Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10. Defense counsel is requesting the owner names of these phone numbers, the providers' names, as well as the type of phone (cell or landline); any and all available current and past cell phone numbers as well as the cell phone carriers' names along with the names of the contracted owners and the names of the phone companies

that provided the services to include the telephone numbers Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 would have access to and use of.

113. Any and all records obtained from residential telephone numbers (past and present) along with requests of any and all cell phone records (past and present) that the Office of Attorney General either obtained through use of a subpoena or search warrant.

114. Any subpoena and/or search warrant obtained and served upon all residential phone providers as well as cell phone providers that are in any way associated with the investigation into these cases that reference Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 as identified under the protective request by the Office of Attorney General.

115. On Page 2, Paragraph No. 5, of the Office of Attorney General's Response, the Office of Attorney General states, "The Commonwealth possesses no reports for Victim 1, Victim 3, Victim 4, Victim 5, Victim 7, Victim 9 or Victim 10". Upon review by defense counsel of prior discovery provided by either the Office of Attorney General or the Pennsylvania State Police, there was reporting completed by agents/troopers that psychological/psychiatric evaluations were completed upon the request of the Office of Attorney General. Copies of psychological/psychiatric evaluations were previously requested by defense counsel in supplemental discovery requests to the Office of Attorney General. Therefore, this Eleventh Supplemental Discovery Request is again requesting the Office of Attorney General provide defense counsel with the evaluation(s) conducted and obtained by the Office of Attorney General of known Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10 that were completed at the request of the Office of Attorney General by government psychologists/psychiatrists and/or any and all civilian psychologists/psychiatrist under contract, or, any other individual evaluations that the accusers/alleged victims have undergone that are in the possession of 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 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' or 'Joseph', written in a cursive style.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Twelfth Supplemental Discovery Request
Based Upon Potential Computer/Cell or Landline Telephone
Searches Conducted by the Office of Attorney General or
Pennsylvania State Police**

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 twelfth 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:

116. Please provide the following computer and/or telephone information for Accusers/Alleged Victims 1, 3, 4, 5, 6, 7, 9 and 10:

a. Any and all computer based searches that include any and all internet providers the accusers/alleged victims either owned or had access in which they would have sent e-mails as well as e-mails with attachments relating to these cases which involve The Pennsylvania State University, The Pennsylvania State University Board of Directors, the potential worth of The Second Mile, and the Defendant;

b. Any and all computer based searches involving civil/litigation attorneys who in any way advertised for alleged victims as what is now commonly known as the "Penn State Scandal" or any other search method that would reference these cases;

c. Any and all e-mails sent or received from other possible victims that relate to the Defendant's investigation, The Pennsylvania State University, The Pennsylvania State University Board of Directors,

The Second Mile or the potential worth of all involved as well as any civil/litigation attorneys who have advertised for clients;

d. All past and present face page(s) that belong to the accusers/alleged victims;

e. The e-mail address, owner name and carrier information for e-mails received from other computers the accusers/alleged victims owned or used;

f. Any and all cell or landline phone record calls from the accusers/alleged victims that they would have had use of or access to including:

1) all cell phone records owned past and present;

2) all cell phone records used that belonged to another individual (parent, guardian or other) that a search warrant or subpoena was used to obtain the records along with those provided by the phone's owner;

3) all "tweets" made by or received by the cell phone owner (past/present) that in any way relate to the Defendant, civil/litigation attorneys, The Second Mile, The Pennsylvania State University, The Pennsylvania State University Board of Directors, or other communication involving these cases;

4) all cell phone logs/official documents received from any and all cell phone providers that the investigation revealed was an important contact number for incoming/outgoing calls.

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'.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Thirteenth Supplemental Discovery Request
Based Upon News Media Releases/Information From News
Media**

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 thirteenth 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:

117. Please provide the following information regarding news media (print/television/radio/computer based) involving the Defendant to include:

- a. Any and all records, files, reports, investigation documents that were in any way provided by the Office of Attorney General and/or the Pennsylvania State Police to any of the aforementioned media;
- b. The identity of the news media to which the documents were provided;
- c. Any and all documents, records, files, video with audio, photographs, radio interviews and/or any other information given to the Office of Attorney General or the Pennsylvania State Police by any member of the news media regardless of its format;
- d. All applications for information under the "Public Record Law" and by whom applications were made for specific and/or general documents under the control of the Office of Attorney General or the Pennsylvania State Police;

e. This request No. 117 shall also apply to all denied requests with copies of the information for which application was made along with the letter/documentation stating the information is not subject to public access.

118. Pennsylvania State Police Incident Investigation No. G07-1146135, Page 54, prepared by Cpl. Joseph A. Leiter describes a text message sent by Sarah Ganim of the Harrisburg *Patriot* newspaper to a known recipient. Please provide a copy of the e-mail that Cpl. Leiter captured from the computer screen by means of photographic equipment as well as any and all further e-mails that were sent by Sarah Ganim to this known individual and/or other person(s) that the Office of Attorney General has documents/records to support such e-mails.

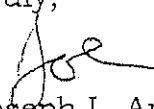
119. Any and all information provided by the accusers/alleged victims and their civil attorneys that in any way relate to a contact by any news media as described in this supplemental discovery request requesting interviews, records, files, etc.

120. Any and all records from all confidential investigations conducted by the Office of Attorney General or the Pennsylvania State Police that were provided or "leaked" in any manner to the news media that was broadcasted through any means as well as the "final disposition" of any and all such investigations to include copies of all reports, information provided, to whom and by whom it was provided as well as any discipline actions resulting from the information being provided.

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', written over the printed name.

Joseph L. Amendola, Esquire

JLA:dka

JOSEPH L. AMENDOLA

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Fourteenth Supplemental Discovery Request
Based Upon the Dauphin County Court Filings by the Office of
Attorney General in the Matter of Commonwealth vs. Timothy
Curley and Gary Schultz**

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 Fourteenth 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:

121. Based upon the above Dauphin County, Pennsylvania criminal cases, please provide the following records, files, reports, documents and related information:

a. The thirty-three-point document the Office of Attorney General filed in The Court of Common Pleas that sets forth the potential false statements/testimony by Mr. Curley/Mr. Schultz as so testified in the matter of Commonwealth vs. Gerald A. Sandusky;

b. All specific points of testimony within the Grand Jury transcript that sets forth the alleged thirty-three points the Office of Attorney General avers as perjured testimony by Mr. Curley and Mr. Schultz;

c. Specific investigative incident reports/supplemental reports/interviews that the Office of Attorney General placed into evidence that supports the claim that testimony was presented in a perjured form;

d. All actual taped interviews/video with audio interviews that in any way supported the same claim regarding the false/misleading testimony by Mr. Curley/Mr. Schultz;

e. Any and all records, files, reports, documents that in any way provide insight into the actions of Mr. Curley/Mr. Schultz before the Grand Jury that will be presented within the Office of Attorney General's case in chief in Dauphin County Court at a date to be determined;

f. Any and all other pertinent records, documents, files, interviews or related printed information not described above yet in any way pertain to Mr. Curley's/Mr. Schultz' cases involving the investigation of the Defendant and discovery requests not already identified and/or provided by the Office of Attorney General to defense counsel;

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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April 3, 2012

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**In Re: Commonwealth vs. Gerald Sandusky
Defendant's Fifteenth Supplemental Discovery Request
Based upon the Criminal Trial to be Held Seeking Physical,
Photographic and Video Evidence the Office of Attorney General
Plans to Use at Trial**

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 fifteenth 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:

122. Please provide actual copies of any and all of the following listed evidence the Office of Attorney General plans to use at trial in this matter:

- a. Any and all "Power Point" displays the Commonwealth has prepared and/or yet to be prepared for its case;
- b. Any and all photographs the Commonwealth has in its possession that will be published or yet to be published for the jury at any point of the trial;
- c. Any and all video the Commonwealth plans to utilize in its case in chief in this matter and/or yet to be prepared as video evidence for trial;
- d. Any and all recorded statements either in video or taped format the Commonwealth plans to use in its prosecution of the Defendant at trial;
- e. Photographs of any and all physical evidence the Commonwealth plans to seek the Court's permission to number and

publish for the jury along with a detailed report as to how the Commonwealth came into possession of such evidence either through a search warrant or subpoena and/or having been given to the Commonwealth by voluntary means identifying where the evidence came from, from whom it came from, the date and time it was obtained, and how it was obtained either by a search warrant, subpoena or by voluntary means;

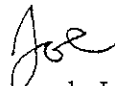
f. Any and all enlargements of investigative reports, either initial or supplemental, medical/psychological/psychiatric and/or any other document the Commonwealth plans upon publishing for trial;

g. Any and all other physical, photographic, video, transcripts and/or other evidence not identified by the Commonwealth that the Commonwealth has plans to seek a court order to number and publish for the jury at trial in this 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.

Truly,



Joseph L. Amendola, Esquire

JLA:dka