

COMMONWEALTH OF PENNSYLVANIA : IN THE COURT OF COMMON PLEAS
:
: CENTRE COUNTY, PENNSYLVANIA
V. : CRIMINAL DIVISION
:
GERALD SANDUSKY : NO. CP-14-CR-2422-2011

INFORMATION

The Attorney General of the Commonwealth of Pennsylvania, by this Information, charges that on diverse dates between January 1994 to December 2008, at College Township, Centre County, Pennsylvania, and various other locations the above-named Defendant did commit the following offenses:

COUNT 1: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 1, who was less than sixteen years of age when the Defendant was four or more years older than Victim 1 and not married to Victim 1. To Wit: The Defendant, Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 1 by performing oral sex on Victim 1.

COUNT 2: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 1, who was less than sixteen years of age when the Defendant was four or more years older than Victim 1 and not married to Victim 1. To Wit: The Defendant Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 1 by compelling juvenile Victim 1 to perform oral sex upon him.

COUNT 3: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(8) – (F-3)

The Defendant did have indecent contact with Victim 1 and/or cause Victim 1 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 1 and Victim 1 was less than sixteen years of age and the Defendant was four or more years older than Victim 1 and the Defendant and Victim 1 were not married. To Wit: The Defendant, Gerald A. Sandusky, being more than twenty years of age, did have indecent contact with juvenile Victim 1.

COUNT 4: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-1)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky did have contact with a minor, juvenile Victim 1, for the purpose of engaging in sexual offenses as set forth in Counts 1, 2 and 3.

COUNT 5: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 1.

COUNT 6: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of Victim 1 by engaging in a course of sexual conduct with Victim 1.

COUNT 7: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 2, who was less than sixteen years of age when the Defendant was four or more years older than Victim 2 and not married to Victim 2. To Wit: The Defendant, Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 2.

COUNT 8: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(8) – (M-2)

The Defendant did have indecent contact with Victim 2 and/or cause Victim 2 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 2 and Victim 2 was less than sixteen years of age and the Defendant was four or more years older than Victim 2 and the Defendant and Victim 2 were not married. To Wit: The Defendant, Gerald A. Sandusky, being more than twenty years of age, did have indecent contact with juvenile Victim 2.

COUNT 9: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-1)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 2, for the purpose of engaging in sexual offenses as set forth in Counts 7 and 8.

COUNT 10: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 2.

COUNT 11: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (M-1)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of juvenile Victim 2 by engaging in sexual conduct with Victim 2.

COUNT 12: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(8) – (M-2)

The Defendant did have indecent contact with Victim 3 and/or cause Victim 3 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 3 and Victim 3 was less than sixteen years of age and the Defendant was four or more years older than Victim 3 and the Defendant and Victim 3 were not married. To Wit: The Defendant, Gerald A. Sandusky, being more than twenty years of age, did have indecent contact with juvenile Victim 3.

COUNT 13: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-3)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky did have contact with a minor, juvenile Victim 3, for the purpose of engaging in sexual offenses as set forth in Count 12.

COUNT 14: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 3.

COUNT 15: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of Victim 3 by engaging in a course of sexual conduct with Victim 3.

COUNT 16: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 4, who was less than sixteen years of age when the Defendant was four or more years older than Victim 4 and not married to Victim 4. To Wit: The Defendant, Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 4 by performing oral sex on juvenile Victim 4.

COUNT 17: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 4, who was less than sixteen years of age when the Defendant was four or more years older than Victim 1 and not married to Victim 4. To Wit: The Defendant, Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 4 by compelling juvenile Victim 4 to perform oral sex upon him.

COUNT 18: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE
18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 4, who was less than sixteen years of age when the Defendant was four or more years older than Victim 4 and not married to Victim 4. To Wit: The Defendant, Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 4 by compelling juvenile Victim 4 to perform oral sex upon him.

COUNT 19: AGGRAVATED INDECENT ASSAULT
18 Pa.C.S. §3125(a)(8) – (F-2)

The Defendant engaged in penetration, however slight, of the anus of Victim 4 with a part of the Defendant's body for any purpose other than good faith, medical, hygienic or law enforcement procedures, where the Defendant is four or more years older than the victim, the victim is less than sixteen years old and the victim and the defendant are not married to each other. To Wit: The Defendant, Gerald A. Sandusky, being more than twenty years of age, did engage in aggravated indecent assault of juvenile Victim 4 who was less than sixteen years old by digitally penetrating Victim 4's anus.

COUNT 20: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(8) – (M-2)

The Defendant did have indecent contact with Victim 4 and/or cause Victim 4 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 4 and Victim 4 was less than sixteen years of age and the Defendant was four or more years older than Victim 4 and the Defendant and Victim 4 were not married. To Wit: The Defendant, Gerald A. Sandusky, being more than twenty years of age, did have indecent contact with juvenile Victim 4.

COUNT 21: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-1)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 4, for the purpose of engaging in sexual offenses as set forth in Counts 16-20.

COUNT 22: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 4.

COUNT 23: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of Victim 4 by engaging in a course of sexual conduct with Victim 4.

COUNT 24: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(7) – (M-1)

The Defendant did have indecent contact with Victim 5 and/or cause Victim 5 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 5, and the victim was less than thirteen years of age and the Defendant and Victim 5 were not married. To Wit: The Defendant, Gerald A. Sandusky, did have indecent contact with Juvenile Victim 5 who was less than thirteen years of age and the Defendant and Victim 5 were not married.

COUNT 25: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-3)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 5, for the purpose of engaging in sexual offenses as set forth in Count 24.

COUNT 26: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 5.

COUNT 27: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (F-3)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endanger the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of Victim 5 by engaging in a course of sexual conduct with Victim 5.

COUNT 28: INDECENT ASSAULT
18 Pa.C.S. §3126(a)(7) – (M-1)

The Defendant did have indecent contact with Victim 6 and/or cause Victim 6 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 6 and the victim is less than thirteen years of age and the Defendant and Victim 6 were not married. To Wit: The Defendant, Gerald A. Sandusky, did have indecent contact with Juvenile Victim 6 who was less than thirteen years of age and the Defendant and Victim 6 were not married.

COUNT 29: UNLAWFUL CONTACT WITH MINORS
18 Pa.C.S. §6318(a)(1) – (F-3)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 6, for the purpose of engaging in sexual offenses as set forth in Count 28.

COUNT 30: CORRUPTION OF MINORS
18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 6.

COUNT 31: ENDANGERING WELFARE OF CHILDREN
18 Pa.C.S. §4304(a)(1) – (M-1)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endangered the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of juvenile Victim 6 by violating the duty of care, protection or support.

COUNT 32: CRIMINAL ATTEMPT TO COMMIT INDECENT ASSAULT

18 Pa.C.S. §901/3126(a)(8) – (M-2)

The Defendant, did commit the offense of Criminal attempt to commit indecent assault by the doing of an act which constituted a substantial step toward commission of indecent assault. To Wit: The Defendant, Gerald A. Sandusky, did attempt to have indecent contact with Victim 7 or cause Victim 7 to have indecent contact with him for the purpose of arousing sexual desire in either person when Victim 7 was less than sixteen years of age and the Defendant was more than twenty years of age and the Defendant and Victim 7 were not married to each other.

COUNT 33: UNLAWFUL CONTACT WITH MINORS

18 Pa.C.S. §6318(a)(1) – (F-3)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 7, for the purpose of engaging in sexual offenses as set forth in Count 32.

COUNT 34: CORRUPTION OF MINORS

18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 7.

COUNT 35: ENDANGERING WELFARE OF CHILDREN

18 Pa.C.S. §4304(a)(1) – (M-1)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endangered the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of juvenile Victim 7 by engaging in a course of sexual conduct with Victim 7.

COUNT 36: INVOLUNTARY DEVIATE SEXUAL INTERCOURSE

18 Pa. C.S. §3123(a)(7) – (F-1)

The Defendant did engage in deviate sexual intercourse with the Victim 8, who was less than sixteen years of age when the Defendant, was four or more years older than Victim 8 and not married to Victim 8. To Wit: The Defendant, Gerald A. Sandusky, did engage in involuntary deviate sexual intercourse with juvenile Victim 8 by performing oral sex on Victim 8.

COUNT 37: INDECENT ASSAULT

18 Pa.C.S. §3126(a)(8) – (M-2)

The Defendant did have indecent contact with Victim 8 and/or cause Victim 8 to have indecent contact with him for the purpose of arousing sexual desire in himself or in Victim 8 and Victim 8 was less than sixteen years of age and the Defendant was four or more years older than Victim 8 and the Defendant and Victim 8 were not married. To Wit: The Defendant, Gerald A. Sandusky, being more than twenty years of age, did have indecent contact with juvenile Victim 8.

COUNT 38: UNLAWFUL CONTACT WITH MINORS

18 Pa.C.S. §6318(a)(1) – (F-1)

The Defendant did intentionally have contact with a minor for the purpose of engaging in activity prohibited under Chapter 31 of the Crimes Code relating to sexual offenses. To Wit: The Defendant, Gerald A. Sandusky, did have contact with a minor, juvenile Victim 8, for the purpose of engaging in sexual offenses as set forth in Counts 36-37.

COUNT 39: CORRUPTION OF MINORS

18 Pa.C.S. §6301(a)(1)-(M-1)

The Defendant, being of the age of eighteen or upward, by any course of conduct, corrupted or tended to corrupt the morals of a minor less than eighteen years of age, or enticed or encouraged such minor in the commission of an offense under Chapter 31 (relating to sexual offenses). To Wit: The Defendant, Gerald A. Sandusky, did corrupt the morals of a minor, juvenile Victim 8.

COUNT 40: ENDANGERING WELFARE OF CHILDREN


18 Pa.C.S. §4304(a)(1) – (M-1)

The Defendant, being a parent, guardian, or other person supervising the welfare of a child under eighteen years of age did knowingly endangered the welfare of the child by violating a duty of care, protection or support. To Wit: The Defendant, Gerald A. Sandusky, did endanger the welfare of juvenile Victim 8 by engaging in sexual conduct with Victim 8.

ALL OF WHICH is against the Act of Assembly and the peace and dignity of the
Commonwealth of Pennsylvania.

LINDA L. KELLY
Attorney General

BY:


FRANK G. FINA
Chief Deputy Attorney General
Criminal Prosecutions Section



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ATTORNEY GENERAL
HARRISBURG, PA. 17120

16TH FLOOR
STRAWBERRY SQUARE
HARRISBURG, PA 17120
(717)787-3391

LINDAL K. KELLY
ATTORNEY GENERAL

June 17, 2011

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

Dear Mr. Fina:

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

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

Very truly yours,

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

Linda L. Kelly
Attorney General

PLEA OF DEFENDANT

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

Date

Defendant

Attorney for Defendant

WAIVER OF JURY TRIAL

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

Date

Defendant

Attorney for Defendant

WAIVER OF ARRAIGNMENT

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

Date

Defendant

Attorney for Defendant

CHANGE OF PLEA

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

Date

Defendant

Attorney for Defendant