

## VICTIM 1

The Grand Jury conducted an investigation into the reported sexual assault of a minor child, Victim 1, by Sandusky, when Victim 1, a Second Mile participant, was a houseguest at Sandusky's residence in College Township, Centre County, Pennsylvania. During the course of the multi-year investigation, the Grand Jury heard evidence that Sandusky indecently fondled Victim 1 on a number of occasions, performed oral sex on Victim 1 on a number of occasions and had Victim 1 perform oral sex on him on at least one occasion.

Victim 1 testified that he was 11 or 12 years old when he met Sandusky through The Second Mile program in 2005 or 2006. As with the remaining victims, Victim 1 only came to Sandusky's attention during his second year in the program, when the boy attended The Second Mile's camp on the Penn State University Park campus. During the 2007 track season, Sandusky began spending time with Victim 1 weekly, having the boy stay overnight at his residence in State College, Pennsylvania. Sandusky took Victim 1 to professional and college sporting events, such as Philadelphia Eagles games, or pre-season practices at Penn State. When Victim 1 slept at the Sandusky residence, he would sleep in a finished bedroom in the basement. Occasionally, other boys would also stay overnight at Sandusky's home but usually it was only Victim 1. Sandusky also encouraged Victim 1 to participate in The Second Mile as a volunteer. Sandusky gave Victim 1 a number of gifts, including golf clubs, a computer, gym clothes, dress clothes and cash. Sandusky took the boy to restaurants, swimming at a hotel near Sandusky's home, and to church.

Victim 1 testified that Sandusky had a practice of coming into the basement room after he told Victim 1 that it was time to go to bed. Victim 1 testified that Sandusky would "crack his back." He described this as Sandusky getting onto the bed on which Victim 1 was already lying

and rolling under the boy. With Victim 1 lying on top of him, face to face, Sandusky would run his arms up and down the boy's back and "crack" it. The back-cracking became a ritual at bedtime. Victim 1 said that after Sandusky had cracked his back a number of times, he progressed to rubbing Victim 1's backside while they lay face-to-face on the bed. Victim 1 testified that this began to occur during the summer of 2005 or 2006, before he entered sixth or seventh grade. Sandusky then began to blow on Victim 1's bare stomach. Eventually, Sandusky began to kiss Victim 1 on the mouth. Victim 1 was uncomfortable with the contact and would sometimes try to hide in the basement to avoid Sandusky. Victim 1 testified that ultimately Sandusky performed oral sex on him more than 20 times through 2007 and early 2008. Sandusky also had Victim 1 perform oral sex on him one time and also touched Victim 1's penis with his hands during the 2007-2008 time period. Victim 1 did not want to engage in sexual conduct with Sandusky and knew it was wrong. Victim 1 stopped taking Sandusky's phone calls and had his mother tell Sandusky he was not home when Sandusky called. This termination of contact with Sandusky occurred in the spring of 2008, when Victim 1 was a freshman in high school.

Before Victim 1 ceased contact with Sandusky, Sandusky routinely had contact with him at a Clinton County high school where the administration would call Victim 1 out of activity period/study hall in the late afternoon to meet with Sandusky in a conference room. No one monitored these visits. Sandusky assisted the school with coaching varsity football and had unfettered access to the school.

Victim 1 testified about an incident that occurred one evening at the high school when he and Sandusky were alone in the weight room where there was a rock climbing wall. After Victim 1 fell off the wall a few times, Sandusky lay down on top of him, face to face, and was

rolling around the floor with the boy. No one was able to see Victim 1 and Sandusky because of the configuration of the room. Sandusky was lying under Victim 1 with his eyes closed. Suddenly a wrestling coach, Joe Miller, unexpectedly entered the room and Sandusky jumped up very quickly and explained that they had just been wrestling.

Joseph Miller testified that he was head wrestling coach for the elementary wrestling program for that school district. He knew Victim 1, who had wrestled for him. Miller corroborated that one evening in 2006 or 2007, he returned to the high school to retrieve something he had forgotten. He saw a light on in the weight room which should have been turned off and when he went in, he discovered Victim 1 and Sandusky, lying on their sides, in physical contact, face to face on a mat. He said both Victim 1 and Sandusky were surprised to see him enter the room. He recalls that Sandusky jumped up and said, "Hey Coach, we're just working on wrestling moves." Sandusky was not a wrestling coach. Miller found the use of that secluded room odd for wrestling because the bigger wrestling room right outside the weight room had more room to wrestle and more mats. He had seen Victim 1 with Sandusky frequently before the weight room incident. He saw them together after school and before athletic practice time.

Steven Turchetta testified that he was an assistant principal and the head football coach at the high school attended by Victim 1. He testified that Sandusky was a volunteer assistant football coach. Sandusky also worked with children in the Second Mile program in that school district. Turchetta described the Second Mile as a very large charitable organization that helped children who are from economically underprivileged backgrounds and who may be living in single parent households. Turchetta first met Sandusky in 2002 when Sandusky attempted to assist some Second Mile members who were on Turchetta's football team. Sandusky's

involvement grew from there. In the 2008 season, Sandusky was a full-time volunteer coach. Turchetta said it was not unusual for him, as assistant principal, to call a Second Mile student out of activity period at the end of the day, at Sandusky's request, to see Sandusky. He knew of several students who were left alone with Sandusky, including Victim 1. Turchetta characterized Sandusky as very controlling within the mentoring relationships he established with Second Mile students. Sandusky would often want a greater time commitment than the teenagers were willing to give and Sandusky would have "shouting matches" with various youths, in which Turchetta would sometimes be the mediator. Turchetta would also end up being Sandusky's point of contact for a youth whom he had been unable to reach by phone the previous evening. Turchetta testified that Sandusky would be "clingy" and even "needy" when a young man broke off the relationship he had established with him and called the behavior "suspicious." Turchetta became aware of Victim 1's allegations regarding sexual assault by Sandusky when the boy's mother called the school to report it. Sandusky was barred from the school district attended by Victim 1 from that day forward and the matter was reported to authorities as mandated by law.

Office of Attorney General Narcotics Agent Anthony Sassano testified concerning phone records that establish 61 phone calls from Sandusky's home phone to Victim 1's home phone between January 2008 and July 2009. In that same time, there were 57 calls from Sandusky's cell phone to Victim 1's home phone. There were four calls made from Victim 1's home phone to Sandusky's cell phone and one call from Victim 1's mother's cell phone to Sandusky's cell phone. There were no calls made to Sandusky's home phone by Victim 1 during that time period.

Another youth, F.A., age fifteen, testified that Sandusky had taken him and Victim 1 to a Philadelphia Eagles football game and that Sandusky had driven. He witnessed Sandusky place

his right hand on Victim 1's knee; Sandusky had also done this to F.A. on more than one occasion when they were in Sandusky's car. F.A. was uncomfortable when Sandusky did this and moved his leg to try to avoid the contact. Sandusky would keep his hand on F.A.'s knee even after F.A. tried to move it. F.A. also testified that Sandusky would reach over, while driving, and lift his shirt and tickle his bare stomach. F.A. did not like this contact. F.A. also witnessed Sandusky tickling Victim 1 in similar fashion. Sandusky invited F.A. to stay over at his house but F.A. only stayed one time when he knew Victim 1 was also staying over, after returning from the Philadelphia Eagles game. F.A. confirmed that Victim 1 slept in Sandusky's basement room when F.A. stayed there. F.A. testified that he stayed away from Sandusky because he felt he didn't want to be alone with him for a long period of time, based on the tickling, knee touching and other physical contact. Victim 1 confirmed that Sandusky would drive with his hand on Victim 1's leg.

## **VICTIM 2**

On March 1, 2002, a Penn State graduate assistant ("graduate assistant") who was then 28 years old, entered the locker room at the Lasch Football Building on the University Park Campus on a Friday night before the beginning of Spring Break. The graduate assistant, who was familiar with Sandusky, was going to put some newly purchased sneakers in his locker and get some recruiting tapes to watch. It was about 9:30 p.m. As the graduate assistant entered the locker room doors, he was surprised to find the lights and showers on. He then heard rhythmic, slapping sounds. He believed the sounds to be those of sexual activity. As the graduate assistant put the sneakers in his locker, he looked into the shower. He saw a naked boy, Victim 2, whose age he estimated to be ten years old, with his hands up against the wall, being subjected to anal

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: SUSQUEHANNA



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 34-3-02  
MDJ Name: Hon. JODI CORDNER  
Address: 17544 SR 11  
NEW MILFORD PA 18834  
Telephone: 570-465-3551

DEFENDANT: (NAME and ADDRESS):  
ERIC T DANIELS  
First Name Middle Name Last Name Gen  
212 HARVEST MOON PARK  
LINDEN PA 17744

NCIC EXTRADITION CODE TYPE							
<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 4-Felony No Ext.	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> E-Misdemeanor Pending				
<input type="checkbox"/> 2-Felony Ltd	<input type="checkbox"/> 5-Felony Pend.	<input type="checkbox"/> C-Misdemeanor Surrounding States	Distance:				
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> D-Misdemeanor No Extradition					
DEFENDANT IDENTIFICATION INFORMATION							
Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number	SID:	Request Lab Services?		
CR-106-14	06/11/14	T476254-2	R05-0632425		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
GENDER	DOB	POB	Add'l DOB	Co-Defendant(s)			
<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	02/01/1969			<input type="checkbox"/>			
AKA	First Name	Middle Name	Last Name	Gen			
RACE	<input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown						
ETHNICITY	<input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown						
HAIR COLOR	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red / Auburn) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONC (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk. / Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input checked="" type="checkbox"/> BLN (Blonde / Strawberry)						
EYE COLOR	<input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Mauve) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)						
Driver License	State	License Number	Expires:	WEIGHT (lbs.)			
	PA	21 946 911		200			
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			DNA Location			
FBI Number	MNU Number		Pt. HEIGHT in.				
			5 10				
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO						
Fingerprint Classification							
DEFENDANT VEHICLE INFORMATION							
Plate #	State	Hazmat	Registration Sticker (MM/YY)	Comm'l Veh. Ind.	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
VIN	Year	Make	Model	Style	Color		<input type="checkbox"/>

Office of the Attorney for the Commonwealth  Approved  Disapproved because \_\_\_\_\_  
(The attorney for the Commonwealth may require that the complaint, arrest warrant or Affidavit, or both be approved by the attorney for the Commonwealth prior to filing, 18 Pa.C.S. § 507.)

Name of Attorney for Commonwealth - (Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR MARK MULVEY

00438681/07034

of the Pennsylvania State Police, Troop R, Gibson

PAPSP8300

do hereby state: (check appropriate box)

- 1  I accuse the above named defendant who lives at the address set forth above  
 I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_  
 I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe or Jane Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at \_\_\_\_\_  
 202 (Municipality Code) FORMER RESIDENCE OF ERIC DANIELS  
 WHICH WAS RR 2 BOX 115F THOMPSON  
 LOCATED IN ARARAT TWP  
 (Place-Political Subdivision)

in SUSQUEHANNA County (County Code) 58 on or about DURING THE COURSE OF 2004 THUR 2005





# POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed 08/11/14	OTN/LiveScan Number	Complaint/Incident Number R05-
Defendant Name	First: ERIC	Middle: T	Last: DANIELS

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	3	3126	(a)(7)	of the	Title 18, PA Crimes Code	1	M1		170/
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):  
**Indecent Assault**  
 Acts of the accused associated with this Offense:  
 IN THAT, on or about said date, THE DEFENDANT did have indecent contact with a complainant who was less than 13 years of age, namely ( age 7), or did cause the complainant to have indecent contact with the defendant, in violation of Section 3126(a)(7) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

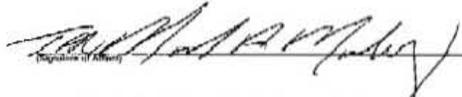
Docket Number	Date Filed 06/11/14	OTN/LiveScan Number	Complaint/Incident Number R05-
Defendant Name	First ERIC	Middle: T	Last DANIELS

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

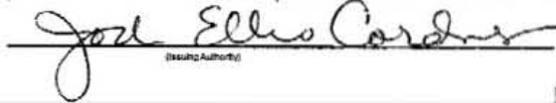
**(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)**

JUNE 11<sup>TH</sup> OF 2014, ..  
(Date)

  
(Signature of Authority)

AND NOW, on this date, June 11, 2014 I certify that the complaint has been properly completed and verified. A affidavit of probable cause must be completed before a warrant can be issued.

34-3-02  
(Magisterial District Court Number)

  
(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 06/11/2014	OTN/LiveScan Number	Complaint/Incident Number R05-0932425
Defendant Name:	First: ERIC	Middle: T	Last: DANIELS

**AFFIDAVIT of PROBABLE CAUSE**

You affiant is a sworn member of the Pennsylvania State Police assigned to the Gibson Station.

In February of 2013, Sgt J. STEELMAN who is employed by the Woodstock Police Department in Georgia, forwarded his police report along with attachments and video recordings of interviews pertaining to the sexual abuse reported to his department by the victim. He related that on December 6th of 2013, he was notified of a female that arrived at the Woodstock Georgia Police Station to make a report of child molestation. Sgt. STEELMAN related that he directed Detective Ron HUGHES to conduct an interview of the woman identified as Moriah DANIELS. Moriah DANIELS brought her niece to the police department to make a report of sexual abuse.

Moriah DANIELS W/N-F 12/19/1975 age 37 of 508 Chieftan Woodstock GA 30188 (404) 993-2413 was interviewed on 12/06/2013 at the Woodstock Police Department by Detective Ron HUGHES. DANIELS related the following; she advised Detective HUGHES that several days ago, her niece whose name she said was was dropped off at her house by her brother Eric DANIELS. Moriah DANIELS stated that the last time that she saw was when she was six years of age. Moriah DANIELS informed Detective HUGHES that last evening that younger sister was also dropped off at her house. Moriah stated that once the children were both in her home, began telling her about things that were happening and that have happened between her and her father. Moriah DANIELS related that sclosed to her that her father molested her since she was very young. told Moriah that she informed her stepmother April DANIELS about the abuse but said that April did nothing to stop the abuse.

I, **TROOPER MARK A MULVEY**, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

*Mark A. Mulvey*  
(Signature of Affiant)

Sworn to me and subscribed before me this 11th day of June 2014

Date Jodi Ellis Cardner Magisterial District Judge

My commission expires first Monday of January, 2018





**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: 06/11/2014	OTN/LiveScan Number	Complaint/Incident Number R05-0932425
Defendant Name:	First: ERIC	Middle: T	Last: DANIELS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Moriah stated that [redacted] told her that the abuse occurred in several different states during the course of her life. Moriah DANIELS related that she is not very close with her brother Eric and related that he moves quite often. [redacted] disclosed that the most recent event of sexual abuse occurred at Breman Georgia at Yogi Bear's Jelly stone Park located at 106 King Street. Moriah DANIELS stated that her brother and his family have been moving from place to place ranging from Pennsylvania, South Carolina and now are residing in Georgia. Moriah stated that her brother Eric is currently residing with his two daughter's [redacted] and [redacted] and his wife April DANIELS and also a woman named Lauren. Moriah stated that [redacted] also Informed her of a computer at her brother's trailer that allegedly contains pictures of underage girls being molested.

[redacted] of 508 Chieftan Woodstock GA 30188 (404) 993-2413 was interviewed on 12/06/2013 at the Woodstock Police Department by Detective Ron HUGHES. Detective HUGHES advised [redacted] that only tell him what she felt comfortable telling him due to the fact that he was setting up for [redacted] to be interviewed by a Forensic Interviewer at the Anna CRAWFORD Children's Center. [redacted] did relate that she was sexually abused in Pennsylvania several years ago, which she reported to authorities but said that the charges were dropped because she stopped talking about the incidents involving her and her father. Alexa stated that at that particular time, she did not want her father to go to jail so she stopped talking to authorities about what had happened to her. [redacted] advised Detective HUGHES that the last time that she was molested was three weeks ago in Breman Georgia. She did indicate that her family at that time was staying at Jellystone Park and the Yogi Bear Camp when then sexual abuse occurred between her and her father. Detective HUGHES asked [redacted] if she was aware of any sexual abuse that may have occurred between her sister [redacted] and her father. [redacted] stated that her sister had never said anything to her about being sexually abused by their father, but related that she knew that she was because she saw videos and pictures of her sister being molested on her father's computer. She stated that the videos and pictures were stored on a hard drive, which is kept in the cabinet above the table in their camper. [redacted] related that this hard drive contained pictures of her, her sister and other children and videos of adult sexual activity. She stated that in the past her father would make her watch these videos in order to get her to participate in sexual activity with him and other people. Detective HUGHES then set up a forensic interview at the Anna Crawford Children's Center located in Cherokee County Georgia.

  
(Signature of Affiant)

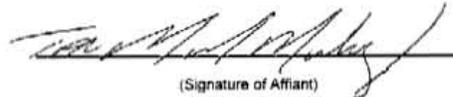


**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: 06/11/2014	OTN/LiveScan Number	Complaint/Incident Number R05-0932425
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**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Detective HUGHES related that Linda A. BANIK then conducted a Forensic Interview. Detective SCHAEFER of the Woodstock Police Department observed the Forensic Interview. During the interview, [redacted] related that the sexual abuse involving her father began when she was 7 years of age in Pennsylvania just after her father split up with a woman she identified as her ex-stepmother whose name she related was Dawn DANIELS. At that time Eric DANIELS resided in Susquehanna County. She stated that her father would make her perform oral sex on him and she would also have to give her father "hand jobs". She also stated that her father would also touch her vaginal area with his private area. She also related that her father would perform oral sex on her as well. Detective HUGHES related that based on information that [redacted] provided in her interviews, which she said that her father was in possession of child pornography that he kept in his possession. Detective HUGHES executed a search warrant on Eric DANIELS camper as well as the hotel room he was staying in. A hard drive, disks, journals, and several other items of interests were obtained in the search. A CD-R that was found in the camper contained 109 photographs of child pornography with children in various stages of undress and also depicting multiple acts of penetration and sodomy. The ages of the children ranged from infants to pre-teens. Detective HUGHES indicated that the videos and pictures that were obtained in the execution of the search warrant were many pictures and videos of Eric DANIELS performing oral sex on [redacted] as well as [redacted] performing oral sex on him.

  
(Signature of Affiant)

