

6. On Saturday, November 5, 2011, the children's Grandfather, Jerry Sandusky, was arrested and charged with 40 criminal counts related to sexual abuse of children (See Grand Jury Report "Attachment A").

7. Upon learning of these charges, Mother requested that Father not permit the children to be around Jerry Sandusky and that the children not be taken to Dorothy and Jerry Sandusky's residence during Father's custodial weekend.

8. Upon information and belief, on Saturday, November 6, 2011, Father took the children to Jerry and Dorothy Sandusky's home.

9. Mother learned that the children had gone to their grandparents home through a text message from Dorothy Sandusky. While Dorothy Sandusky stated to Mother that Jerry Sandusky was not home at the time that the children visited, Mother is not confident that either Father or Dorothy Sandusky will keep the children away from Jerry Sandusky if the children are permitted to visit his residence.

10. Since early last Spring, Father has refused to communicate directly with Mother regarding the children. Instead, Father has required Mother to conduct all communication regarding the children through Dorothy Sandusky. The Court's order of August 3, 2011 provision number 10, requires Father to communicate with Mother regarding the children and to provide contact information for that purpose. However, Father has refused to adhere to this requirement. Mother attempted to reach a mediated agreement regarding improving methods of communication with Father in August 2011, but mediation failed when Father refused to agree to contact between the parties regarding the children.

11. On Sunday, November 6, 2011 Dorothy Sandusky telephoned Mother and attempted to convince her that the children would be safe around Jerry Sandusky and that the

children would be safe at her residence. While Dorothy Sandusky did not state that she would allow the children to see Jerry Sandusky, the conversation left Mother very concerned about Dorothy Sandusky's intentions regarding allowing the children to be in Jerry Sandusky's presence. Communication between Dorothy Sandusky and Mother regarding the children has been strained for some time, but now has become impossible because their fundamental disagreement about the validity of the charges against Jerry Sandusky and the risk he poses to the children.

12. Mother does not believe that it is in the best interests of her children to be at Jerry Sandusky's residence or in the presence of Jerry Sandusky until such time as the current serious allegations against him are resolved by the courts.

13. Mother is no longer able to effectively communicate with Father regarding the children with Dorothy Sandusky acting as a third party, and believes it is in the best interest of the children that communication between the parents in this matter be directly between Mother and Father by text, telephone and email.

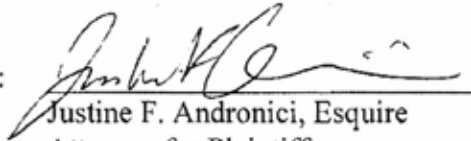
14. Thursday November 10, 2011 is the next scheduled custodial period between Father and the children.

WHEREFORE, Plaintiff requests this Honorable Court to enter a temporary order stating that until further order of the court, the children shall not be in the home of Jerry Sandusky or in his presence. Furthermore, the Plaintiff requests that Father be ordered to provide mother with contact information so that she may communicate with him directly regarding the children.

Respectfully submitted,

Centre County Women's Resource Center
Civil Legal Representation Project

BY:



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VERIFICATION

I hereby verify that the statements appearing in the foregoing pleading are true and correct to the best of my information, knowledge and belief. I understand that the statements made herein are subject to penalties of Title 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Jill Jones', is written over a horizontal line. The signature is stylized and cursive.

Jill Jones (formerly Sandusky), Plaintiff