**STATE’S RESPONSE TO DEFENDANT’S REQUEST FOR A BILL OF PARTICULARS**

##### Commonwealth of Pennsylvania

**Court of Common Pleas**

**Philadelphia County**

The Commonwealth, in response to the defendant’s request for a bill of particulars, alleges as follows:

1. The defendant’s sexual assault of the two complainants in this case, [VICTIMS], then ages \_\_\_\_\_\_\_\_\_\_\_\_\_, was a continuing course of conduct during the period from [DATE OR DATE RANGE].
2. The complainants cannot recall the exact dates of the sexual assaults.
3. The assaults occurred both on weekdays after school hours and on weekend days while school was in session and throughout the week during the summer vacation.
4. The defendant threatened both complainants, exhorting them not to tell anyone of the sexual assaults. The defendant said that he would have the complainants’ father beat up and thrown in jail if they told of the assaults.
5. The sexual assaults ceased after the complainants informed their father of the sexual assaults on approximately [DATE].

Dated:

Respectfully submitted,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Assistant District Attorney