

policy.” 155 Cong. Rec. S9541–42 (daily ed. Sept. 17, 2009).

Despite the evidence of punitive intent on the part of some members of Congress, unlike in *Lovett*, there is no congressional *finding* of guilt in this case. In *Lovett*, a secret trial was held by Congress to determine the guilt or innocence of the accused subversives. Upon a finding of guilt, Congress passed the law denying the accused their salary for federal service. Thus, in *Lovett*, the congressional record was “unmistakably” clear as to Congress’s intent to punish the subject individuals. Here, at most, there is the “smattering” of legislators’ opinions regarding ACORN’s guilt of fraud. See *United States v. O’Brien*, 391 U.S. 367, 384, 88 S.Ct. 1673, 20 L.Ed.2d 672 (1968) (“What motivates one legislator to make a speech about a statute is not necessarily what motivates scores of others to enact it.”); cf. *Selective Serv. Sys.*, 468 U.S. at 855–56, 104 S.Ct. 3348 (upholding law denying federal financial assistance for higher education to male students who failed to register for the draft; in that case, as here, many legislators commented that the men who failed to register for the draft had committed a “felony, they have violated the law, and they are not entitled to these educational benefits”); *BellSouth Corp.*, 162 F.3d at 690 (sustaining provision that placed special restrictions on Bell operating companies and dismissing a “few scattered remarks referring to . . . abuses allegedly committed by [Bell operating companies] in the past” as not providing the kind of “‘smoking gun’ evidence of congressional vindictiveness”).

To be sure, a congressional finding following a legislative trial is not the only way to establish the “unmistakable evidence” of punitive intent in the legislative record; however, here, the statements by a handful of legislators are insufficient to establish—by themselves—the clearest

proof of punitive intent necessary for a bill of attainder. Nor is the legislative record sufficient to demonstrate “punishment” cumulatively with the historical and functional tests of punishment analyzed above.

### III. CONCLUSION

In accordance with the foregoing, the judgment of the District Court is affirmed in part and vacated in part. We remand for further proceedings as to the plaintiffs’ First Amendment and due process claims.



**Jesse FRIEDMAN, Petitioner–  
Appellant,**

v.

**Joe REHAL, Parole Officer, Robert  
Dennison, Chairman of the New York  
State Division of Parole, and Andrew  
Cuomo, Attorney General of the State  
of New York, Respondents–Appellees.**

**Docket No. 08–0297–pr.**

United States Court of Appeals,  
Second Circuit.

Argued: July 8, 2009.

Decided: Aug. 16, 2010.

**Background:** Petitioner, upon plea of guilty, was convicted in state court for sodomy in the first degree, use of child in sexual performance, sexual abuse in the first degree, attempted sexual abuse in the first degree, and endangering welfare of minor. After his release from prison, state court denied his request for post-conviction relief, and petitioner filed federal petition for writ of habeas corpus. The United States District Court for the Eastern Dis-

trict of New York, Seybert, J., 2008 WL 89625, dismissed petition and granted certificate of appealability. Petitioner appealed.

**Holdings:** The Court of Appeals, Edward R. Korman, J., sitting by designation, held that:

- (1) petitioner was required to file habeas petition within one year of viewing documentary film;
- (2) petitioner's submission of unauthorized application for leave to appeal denial of post-judgment motion to vacate his conviction to New York Court of Appeals could not provide basis for tolling of statute of limitations;
- (3) state court's rejection of claim that state's failure to disclose use of hypnosis to induce complainants to recall instances of sexual abuse did constitute *Brady* violation was not unreasonable application of Supreme Court precedent; but
- (4) focus on impediment to legal relief should not obscure continuing ethical obligation of New York District Attorney to seek justice.

Affirmed.

Reena Raggi, Circuit Judge, concurring in part and filed opinion.

### 1. Criminal Law ⇌273(1)

Conviction based on plea of guilty without the defendant explicitly admitting his guilt simply reflects fact that for some reason, sufficient to defendant, he decided to waive his trial rights. U.S.C.A. Const. Amend. 6.

### 2. Habeas Corpus ⇌603.12

Petitioner, who pled guilty to sex-related offenses involving minors, knew, or should have known through exercise of due diligence, that prosecution may have withheld information regarding use of hypnosis

to induce complainants to recall instances of sexual abuse soon after he viewed, approximately 15 years after his entry of plea, documentary film regarding investigation leading to his arrest and conviction, and thus, pursuant to factual predicate exception to one-year statute of limitations for filing federal habeas claims, petitioner was required to file habeas petition within one year of viewing film. 28 U.S.C.A. § 2244(d)(1)(D).

### 3. Habeas Corpus ⇌603.9

Petitioner's submission of application for leave to appeal denial of post-judgment motion to vacate his conviction to New York Court of Appeals could not provide basis for tolling of one-year statute of limitations for filing of federal habeas petition, where application was not authorized under New York Criminal Procedural Law. 28 U.S.C.A. § 2254; N.Y.McKinney's CPL §§ 450.10, 450.15.

### 4. Habeas Corpus ⇌603.9

Effort to exhaust state remedies by procedures that are not authorized by state law does not toll the one-year statute of limitations for filing of federal habeas petitions. 28 U.S.C.A. § 2254.

### 5. Habeas Corpus ⇌603.18

Claim of actual innocence could provide basis for excusing late filing of federal habeas petition even though the petitioner pled guilty. 28 U.S.C.A. § 2254.

### 6. Courts ⇌92

#### Habeas Corpus ⇌450.1, 452

"Clearly established" federal law, within meaning of Antiterrorism and Effective Death Penalty Act (AEDPA), refers to holdings of Supreme Court, as opposed to dicta, as of time of relevant state court decisions. 28 U.S.C.A. § 2254(d)(1).

See publication Words and Phrases for other judicial constructions and definitions.

**7. Habeas Corpus** ¶452

Decision is “contrary to” federal law, within meaning of Antiterrorism and Effective Death Penalty Act (AEDPA), if state court arrives at conclusion opposite to that reached by Supreme Court on question of law or if state court decides case differently than Supreme Court has on set of materially indistinguishable facts. 28 U.S.C.A. § 2254(d)(1).

See publication Words and Phrases for other judicial constructions and definitions.

**8. Habeas Corpus** ¶450.1

“Unreasonable application” of federal law, within meaning of Antiterrorism and Effective Death Penalty Act (AEDPA), occurs when state court identifies correct governing legal principle but unreasonably applies that principle to facts of petitioner’s case. 28 U.S.C.A. § 2254(d)(1).

See publication Words and Phrases for other judicial constructions and definitions.

**9. Habeas Corpus** ¶450.1

Under Antiterrorism and Effective Death Penalty Act (AEDPA), unreasonableness of a state court’s application of federal law is determined by “objective” standard. 28 U.S.C.A. § 2254(d)(1).

**10. Constitutional Law** ¶4587

Impeachment information is special in relation to fairness of criminal trial, not in respect to whether plea is voluntary, and thus failure to disclose such information prior to guilty plea does not violate Due Process Clause. U.S.C.A. Const.Amend. 14.

**11. Witnesses** ¶311

“Impeachment evidence” is evidence that is offered to discredit witness’s testimony, to reduce effectiveness of her testimony by bringing forth evidence which

explains why jury should not put faith in her or her testimony.

See publication Words and Phrases for other judicial constructions and definitions.

**12. Habeas Corpus** ¶480

State court’s rejection of petitioner’s claim that state’s failure to disclose, prior to defendant’s entry of plea of guilty to sex-related offenses involving minors, use of hypnosis to induce complainants to recall instances of sexual abuse constituted *Brady* violation was not unreasonable application of Supreme Court precedent, and thus petitioner was not entitled to federal habeas relief as to that claim. 28 U.S.C.A. § 2254(d)(1).

**13. Criminal Law** ¶1980**District and Prosecuting Attorneys** ¶8(3)

In representing the sovereign, prosecutor is servant of the law, twofold aim of which is that guilt shall not escape or innocence suffer.

**14. Criminal Law** ¶1981

While a prosecutor may strike hard blows, he is not at liberty to strike foul ones; it is as much his duty to refrain from improper methods calculated to produce wrongful conviction as it is to use every legitimate means to bring about just one.

**15. District and Prosecuting Attorneys** ¶8(3)

Prosecutors have obligation to curb police overzealousness.

**16. Habeas Corpus** ¶770

In habeas appeals which raise concerns about quality of evidence and guilt of the petitioner, federal appellate court defers to judgment of jury after petitioner has received fair trial, and takes comfort in established safeguards of Anglo-American legal system which leave veracity of witness to be tested by cross-examination,

and credibility of his testimony to be determined by properly instructed jury. 28 U.S.C.A. § 2254.

**17. Habeas Corpus** ¶462

Whether federal right to be released upon proof of actual innocence exists is open question; federal habeas courts have struggled with it over the years, in some cases assuming, *arguendo*, that it exists while also noting difficult questions such right would pose and high standard any claimant would have to meet. 28 U.S.C.A. § 2254.

**18. District and Prosecuting Attorneys** ¶8(9)

**Habeas Corpus** ¶362.1, 462

Focus on impediment to legal relief to federal habeas petitioner, who not only sought relief on unresolved basis of federal constitutional right to release on proof of actual innocence but had failed to exhaust his claim of actual innocence in state courts, even though New York cases suggested that relief on such basis might be available, should not obscure continuing ethical obligation of New York District Attorney to seek justice, since record suggested “reasonable likelihood” that petitioner, who pled guilty to sex-related offenses, was wrongly convicted; only re-investigation of underlying case or development of complete record in collateral proceedings could provide basis for determining whether petitioner’s conviction should be set aside. 28 U.S.C.A. § 2254; N.Y.Rules of Prof.Conduct, Rule 3.8.

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of Ronald L. Kuby, New York, N.Y., for Petitioner–Appellant.

Judith R. Sternberg, Assistant District Attorney (Kathleen M. Rice, District Attorney, Peter A. Weinstein, Assistant District Attorney of Counsel, on the brief), Nassau County, N.Y., for Respondents–Appellees.

Before POOLER and RAGGI, Circuit Judges, and KORMAN, District Judge.\*

EDWARD R. KORMAN, District Judge:

This is an appeal from the denial of a writ of habeas corpus in a case in which petitioner who pled guilty seeks habeas corpus relief on the ground that exculpatory evidence was withheld from him. Because his petition was not filed timely, he also argues that his failure to do so should be excused on the ground that he is actually innocent. We affirm the judgment of the United States District Court for the Eastern District of New York (Seybert, *J.*) denying the writ without reaching the latter issues, because we conclude that the grounds asserted in the petition would not justify habeas corpus relief.

**BACKGROUND**

We summarize below the facts as alleged in the petition, as well as the affidavits and supporting materials, including the transcript used in the documentary film *Capturing the Friedmans*, and the memoranda of interviews taken in preparation for the film. These materials, some of which were also filed as part of the record in petitioner’s post-judgment motion in the Nassau County Court, are included as part of the record in the district court. The District Attorney’s submission

of New York, sitting by designation.

\*The Hon. Edward R. Korman, of the United States District Court for the \* Eastern District

in opposition to the petition focused principally on whether the petition was timely filed and not on the merits of the allegations in the petition.

#### A. The Investigation

In 1982, Arnold Friedman, a retired school teacher, began teaching computer classes to children in his family's home in Great Neck, New York. In September 1984, Arnold asked petitioner, Jesse Friedman, the youngest of his three sons, to assist him in teaching classes. Petitioner was fifteen years old, and in tenth grade, at the time. Petitioner continued to assist his father until September 1987, when he left to attend college.

After a customs agent intercepted a package containing child pornography addressed to Arnold Friedman, federal agents obtained a search warrant and executed a search of the Friedman home. During the search, they seized a list of names and phone numbers of eighty-one students enrolled in Arnold Friedman's computer classes. Subsequently, Detective Sergeant Fran Galasso, head of the Nassau County Police Department's Sex Crime Unit, sent out two-detective teams to interview students who were currently or formerly enrolled in Arnold Friedman's computer classes about possible abuse.

On November 25, 1987, Arnold Friedman and petitioner were arrested on a felony complaint alleging child sexual abuse. Between December 1987 and November 1988, petitioner was charged with two hundred and forty-three counts of sexual abuse in three separate indictments and arraigned in the County Court, Nassau County (Boklan, *J.*). The indictments originally included allegations from fourteen complainants, all male children ranging in age from eight to twelve years old. Prosecutors had no physical evidence and relied entirely on allegations made by com-

puter students after being questioned by Nassau County detectives. No student had ever complained of abuse, nor had any parent ever observed suspicious behavior, prior to the investigation. Indeed, Assistant District Attorney Onorato acknowledged that "there was a dearth of physical evidence." [*Capturing the Friedmans* Tr. 36, A-316.] Nor was this what he described as "the best case scenario," where "you would like to find videotapes of Mr. Friedman actually sexually abusing the children or at the very least some photographs of some of the children in sort of compromising sexual positions." Onorato admits that "[w]e didn't find any of that." [Jarecki Aff. ¶ 10 (quoting "DVD Extra Material"), A-429.]

The Nassau County Police Department never produced transcripts, recordings, or videotapes of the student interviews that preceded the indictments. Moreover, because Arnold Friedman and petitioner ultimately pled guilty, the circumstances surrounding the interviews were not explored at trial. Some former students and their parents, however, recall with great consistency that detectives employed aggressive and suggestive questioning techniques to gain statements from children who had attended Arnold Friedman's computer classes. Detectives generally entered an interview with a presumption that a child had been abused and refused to accept denials of abuse. If a child denied being the victim of abuse on a first visit, detectives would often visit the child repeatedly for followup interviews, each lasting as long as four hours, until the child admitted abuse. In one case, detectives visited a child fifteen times and assured the child's mother before the final visit that they were going to stay "as long as it takes." [Kuhn Aff. ¶ 10, A-530.]

Likewise, detectives often insisted that they knew that the child they were inter-

viewing had been abused. For example, detectives would often tell children that Arnold Friedman or petitioner had already admitted molesting them or that other students had claimed to have observed them being molested. As one former student described it,

I remember that they made specific suggestions to me about things that they believed happened in the computer classes, and that they told me repeatedly that other students in my class had already told them that they had been abused, and that they were certain that in fact I had also been abused and that I should tell them so.

[Brian Tilker Aff. ¶ 5, A-790.] This strategy was designed to force children to agree with the detectives' story. Detective Squeglia, who conducted many interviews in the case, explained in a recorded interview:

Well, if you talk to a lot of children, you don't give them an option, really. . . . [Y]ou have to tell them pretty honestly that we know you went to Mr. Friedman's class, we know how many times you've been to the class. You know—we go through the whole routine. We know there was a good chance that he touched you or Jesse touched you or somebody in that family touched you in a very inappropriate way.

[Squeglia Tr., *Capturing the Friedmans* Interview, A-459.]

The detectives would reward cooperative children with “pizza parties” and police badges. When children did not admit to experiencing sexual abuse, however, detectives would persist in their questioning, sometimes taunting the children for failing to offer the desired answers. The tactics were so aggressive that several former students admit that they responded to them by falsely alleging instances of abuse. Although these children were aware that

they were lying to the detectives, they ultimately surrendered to the pressure and “remembered” instances of abuse just to “get [the detectives] off [their] back[s].” [See *Capturing the Friedmans* Tr. 99, A-379; Brian Tilker Aff. ¶¶ 8-9, A-790.]

These questioning techniques were used in the police interview of Gary Meyers, a former computer student, which was secretly videotaped by his mother. The videotape portrayed detectives using hostile techniques, including suggestive and harassing questioning, while interrogating Meyers, who was then thirteen years old. Throughout the videotape, detectives pressured Meyers to admit that he was sexually abused. Nevertheless, Meyers maintained that he was never exposed to or witnessed any abuse. When Meyers refused to admit sexual abuse, a detective told Meyers's mother that he did not “like his answers” and referred to Meyers as a “wise guy.” [See Meyers Tr., A-804.] At some point before the third indictment was handed down, either Arnold Friedman or petitioner informed petitioner's attorney, Peter Panaro, about the videotaped interview. Panaro claims that after viewing the videotape, he informed Assistant District Attorney Joe Onorato about it and requested that Onorato provide any evidence of similar “hostile” techniques employed during eyewitness interrogations. The prosecution did not turn over any evidence that detectives used similar techniques during other interviews.

As the detectives continued to aggressively pursue potential victims, the charges against petitioner expanded dramatically in both number and scope. While the first indictment included fifty-four counts, ten of which were against petitioner, the third indictment included three hundred and two counts, one hundred and ninety-eight of which were against petitioner. The allegations also grew increasingly bizarre, sadis-

tic, and even logistically implausible. For example, the third indictment described several group molestation exercises, including “Leap Frog,” in which Arnold Friedman and petitioner allegedly sodomized an entire class of naked boys by “leaping” from one to the next.

As the case expanded, members of the Nassau County District Attorney’s office also began to speculate that a “sex ring” had been operating from the Friedman home and that other teenagers had been involved. Petitioner alleges that, through great pressure, the District Attorney was able to secure a cooperation agreement from an acquaintance of petitioner, Ross Goldstein, in exchange for a favorable plea agreement. Goldstein had until then vehemently denied any knowledge or involvement. Indeed, more than half of the charges against Goldstein were alleged to have taken place before the petitioner and Goldstein had even met. According to John Roe, who was one of two additional teenagers suspected of involvement in a “sex ring,” Goldstein later admitted that he had falsely implicated others under “intense pressure from the police to come up with anything that seemed like cooperation.” [Jarecki Aff. ¶ 12 (quoting “DVD Extra Material”), A-430.]

Due to the “nature of the charges” and the extent of allegations, “the community [was] in an uproar.” [Richard Tilker Aff. ¶ 10, A-787.] The Parent-Teacher Association of Great Neck (“P.T.A.”) sponsored letter writing campaigns and community meetings to reach out to former computer students and their families. In December 1987 and January 1988, Great Neck held two community meetings, sponsored by the school district and the P.T.A., designed to advise parents on the community resources available to deal with child abuse. See William S. Dobkin, *Great Neck Community Marshals its Resources to Deal*

*with Child Abuse and Child-Sex Crime*, Great Neck Record, Feb. 4, 1988, at 5A. About fifty parents attended the first meeting and about three hundred parents attended the second meeting. *Id.* The meetings presented “expert advice” from such speakers as Detective Sergeant Fran Galasso, Assistant District Attorney Joe Onorato, *id.*, and Dr. Sandra Kaplan, a therapist treating many of the alleged victims in the case. *Id.* The expert advice was simple: every former student should be considered a victim and should seek therapy immediately.

Parents of non-complainants recall “a tremendous amount of [social] pressure for children to join the case.” [Richard Tilker Aff. ¶ 10, A-787.] When a child denied abuse, their parents were told that the child was “in denial.” [See *Capturing the Friedmans* Tr. 38-39, A-318-19; Richard Tilker Aff. ¶¶ 9-10, A-786-87; Brian Tilker Aff. ¶ 10, A-791; Forrest Aff. ¶ 5, A-798.] Great Neck had defined itself as a “victimized community,” and those who refused to define themselves as victims no longer “fit in[.]” [*Capturing the Friedmans* Tr. 38, A-318.]

Local newspapers published numerous stories with detailed allegations from the case and extensively covered the community’s outreach programs. The P.T.A. organized car-pools to transport community members to court appearances. Despite the highly explosive nature of the charges, accompanied by what Judge Abbey Boklan, the presiding judge, described as a “media frenzy” [Jarecki Aff. ¶ 9 (quoting “DVD Extra Material,” *Capturing the Friedmans*), A-429], Judge Boklan permitted the case to become the first in Nassau County in which cameras were allowed in the courtroom. As Judge Boklan explained, “It was something the community was very interested in, the media was very interested in. . . . I wasn’t that

concerned about protecting the defendants. Their pictures[,] their names were all over the newspapers, so their reputation [sic] at that point was [sic] not too good.” [Jarecki Aff. ¶ 9 (quoting “DVD Extra Material,” *Capturing the Friedmans*), A-429.] Notwithstanding the atmosphere she described, Judge Boklan denied petitioner’s application for a change of venue.

On March 25, 1988, Arnold Friedman pled guilty to forty-two counts of child sexual abuse, at least in part because he believed petitioner would have a better chance at a fair trial that way. Nevertheless, the plea had the opposite effect. Specifically, after Arnold Friedman pled guilty, he was compelled to give the police a “close-out” statement in which he was asked to confirm that he had molested each child on a list of students. He was told that he would be granted immunity if he confessed to misconduct, but that any child he declined to admit molesting could be the source of further charges against him. In response, Arnold Friedman admitted to molesting each child on the list. Detectives proceeded to share the close-out statement with families of non-complainants to elicit further accusations against petitioner and to discourage former students from publicly supporting petitioner or agreeing to testify on his behalf. Moreover, on June 24, 1988, *Newsday*, the newspaper with the largest circulation in Nassau County, published a story that disclosed that Arnold Friedman “identified about 80 [additional] boys he had sexually abused” in the close-out statement. [See Pet’r Aff. ¶ 29, A-157.]

### B. Petitioner’s Guilty Plea & Sentencing

Petitioner—who was then only nineteen years old—alleges that he faced enormous pressure to plead guilty. The motion he

made for a change of venue had been denied. The leak described above significantly added to the already hostile atmosphere that made a fair trial impossible. The Nassau County District Attorney’s office did everything it could to force petitioner to plead guilty. After the second indictment, for example, Assistant District Attorney Onorato advised petitioner’s attorney, Panaro, that if petitioner refused to plead guilty his office would obtain a third indictment which would include “many more charges than both previous indictments combined, and those charges would be much more serious.” [Panaro Aff. ¶ 5, A-762.] When petitioner declined to plead guilty, Onorato followed through with his threat. Petitioner was also aware that investigations were brewing against his two brothers and many of his high school friends, a threat which he took seriously in light of the growing magnitude of allegations.

Moreover, Judge Boklan acknowledged that “[t]here was never a doubt in [her] mind” as to petitioner’s guilt. [*Capturing the Friedmans* Tr. 33, A-313], and even before she had heard any of the evidence she expressly informed Panaro that, if petitioner went to trial, she intended to sentence him consecutively on every count. Petitioner had until then strenuously resisted the efforts to coerce a plea and vehemently maintained his innocence. Panaro had also been convinced that petitioner was innocent:

I already found it quite incredible that sexual abuse of that scope and severity alleged could have taken place without a single child complaining or showing other signs of abuse. I also believed that the hysteria surrounding the case could well be responsible for the ever growing number of charges. . . . My common sense and logic told me that scores of children, including the 14 children who were complainants against [petitioner],

could not be repeatedly sodomized and sexually abused hundreds of times, over a period of four years, day in and day out, and say nothing. After all these were not 3 and 4 year old boys. They were between 8 and 11 years old. I felt that the idea that no one would have said a word, and that in fact some of the most significant complainants would sign up for multiple classes after having been violently abused in the prior classes, was ridiculous.

[Panaro Aff. ¶ 19, A-766-67.]

[1] Nevertheless, after Judge Boklan's threat, petitioner told Panaro that he wanted to plead guilty "because he believed that if he went to trial he would be found guilty and would spend almost the remainder of his life in jail." [Panaro Aff. ¶ 12, A-764.] Panaro told him that he "would not represent him on a guilty plea unless he was guilty and that [Panaro] could not ethically allow [petitioner] to plead guilty if he was maintaining his innocence to [Panaro]." [Panaro Aff. ¶ 12, A764.] In response to Panaro's erroneous insistence on an admission of guilt,<sup>1</sup> petitioner told Panaro that he had committed the charged offenses, that he had been a victim of sexual abuse by his father, and that his father had coerced him into molesting students.

1. Both the Supreme Court and the New York Court of Appeals have held that a defendant may plead guilty without explicitly admitting his guilt provided that it is a knowing and voluntary plea. See *North Carolina v. Alford*, 400 U.S. 25, 37-38, 91 S.Ct. 160, 27 L.Ed.2d 162 (1970); *People v. Serrano*, 15 N.Y.2d 304, 310, 258 N.Y.S.2d 386, 206 N.E.2d 330 (1965). "Thus a conviction based on [such] a plea of guilty simply reflects the fact that for some reason, sufficient to the defendant, he decided to waive his trial rights." *People v. Grant*, 45 N.Y.2d 366, 379, 408 N.Y.S.2d 429, 380 N.E.2d 257 (1978). Panaro's insistence on an admission of guilt as a condition to

On December 20, 1988, petitioner pled guilty to Sodomy in the First Degree (seventeen counts), Use of a Child in a Sexual Performance (one count), Sexual Abuse in the First Degree (four counts), Attempting Sexual Abuse in the First Degree (one count), and Endangering the Welfare of a Minor (two counts), in full satisfaction of the three indictments filed against him. The minutes of the plea are not available.<sup>2</sup> Judge Boklan sentenced petitioner to multiple concurrent terms, the longest of which was six to eighteen years. Petitioner did not appeal.

A few weeks after petitioner pled guilty, he gave a televised interview to Geraldo Rivera in which he repeated his confession and the story that his father had sexually abused him. Petitioner explains that he confessed to Panaro only so that Panaro would permit him to plead guilty, and that he submitted to the television interview "in what [he] believed to be a last-ditch effort to obtain public sympathy and explain [him]self in some way." [Pet'r Aff. ¶ 40, A-161-62.] Specifically, he made up the story about his father molesting him as a child because he believed it might insulate him from attacks in prison and might persuade Judge Boklan to ask the parole board for leniency on his behalf.

While in prison, petitioner was denied parole four times apparently because he

agreeing to represent him in the guilty plea is difficult to reconcile with these cases.

2. Because petitioner did not take a direct appeal, the transcript of the plea of guilty was never prepared. Petitioner alleges that he and his attorneys made "exhaustive efforts to obtain those transcripts subsequent to his release from prison but have been repeatedly told that the transcripts are unavailable because the stenographer is no longer employed by Nassau County and did not leave behind [stenographic] notes from [petitioner's] guilty plea proceedings." [Pet'r Supplemental Br. at 13 n. 6.]

refused to reiterate his guilt during a sex-offense therapy treatment program, as would have been required to successfully complete the program. See Susan Bandes, *The Lessons of Capturing the Friedmans: Moral Panic, Institutional Denial and Due Process*, 3 *Law Culture & Human.* 293, 304–05 (2007). After serving thirteen years in prison, petitioner was ultimately paroled on December 7, 2001. Judge Boklan held a sex offender registration classification hearing on January 7, 2002, in which she classified petitioner a level III “violent sexual predator” under the Sex Offender Registration Act (New York Correction Law article 6–C).

### C. Post–Conviction Proceedings

In 2000, documentary filmmaker Andrew Jarecki began a three-year investigation of Arnold Friedman and petitioner’s story for his film, *Capturing the Friedmans*. Jarecki interviewed many individuals who were involved with the original criminal investigation of Arnold Friedman and petitioner, including former computer students, detectives, attorneys, and family members. Petitioner first viewed the completed film on January 10, 2003. The film’s producers permitted petitioner to view the underlying documents and footage from the film in July 2003.

Through the film, petitioner claims to have discovered a large volume of information he had never seen before regarding tactics used by detectives and therapists to obtain accusations of abuse from some of the complainants. The film also depicted an anonymous student, described as the source of thirty-five sodomy counts, claiming he was subjected to hypnosis prior to recalling abuse. According to the anonymous student, whom the third indictment referred to as “Gregory Doe” [see Indictment 69783, A–96–103], he did not recall any sexual abuse until after he went

through hypnosis: “I just remember that I went through hypnosis, came out, and it was in my mind” [Gregory Doe Tr. 28, A–692]. This former student’s therapist, however, claims that “[a]t no time during this patient’s treatment did [she] ever use hypnosis” [Parks Aff. ¶ 4, A–867], and Assistant District Attorney Onorato claims that he was unaware of any specific treatment undergone by any complainant. Petitioner argues that other evidence suggests hypnosis was used more broadly.

On January 7, 2004, petitioner filed a post-judgment motion in the County Court, Nassau County, seeking to vacate the December 20, 1988 judgment based on evidence he first discovered after watching *Capturing the Friedmans* on January 10, 2003. Petitioner argued that, pursuant to *Brady v. Maryland*, 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215 (1963), he was entitled to the disclosure of the newly discovered information prior to the entry of his guilty plea. Relying on *United States v. Ruiz*, 536 U.S. 622, 122 S.Ct. 2450, 153 L.Ed.2d 586 (2002), the Nassau County Court denied the petitioner’s motion. On March 10, 2006, the Appellate Division denied petitioner’s application for leave to appeal, at which point petitioner had exhausted his state remedies.

On June 23, 2006, petitioner filed a petition for a writ of habeas corpus in the Eastern District of New York. Petitioner argued that the film *Capturing the Friedmans* brought to light new evidence that (1) some eyewitnesses had initially denied sexual abuse, (2) detectives used interrogation methods known for eliciting false accusations, and (3) at least one suggestive memory recovery tactic—hypnosis—was used to induce memory recall by Gregory Doe before he made an accusation. Petitioner alleged that he would not have pled guilty if he had been aware of this undisclosed evidence.

On July 20, 2007, the district judge dismissed petitioner's first and second claims as untimely but reserved decision on the third claim. On January 4, 2008, the district judge held that petitioner's third claim, which alleged that the prosecution failed to disclose the use of hypnosis on at least one accuser, was untimely. The district judge subsequently granted a certificate of appealability.

## DISCUSSION

### I.

The only claim petitioner presses on appeal is the *Brady* claim that the prosecution should have disclosed the use of hypnosis to induce complainants to recall instances of sexual abuse. We conclude that this claim is untimely. Under the Antiterrorism and Effective Death Penalty Act of 1996 ("AEDPA"), Pub.L. No. 104-132, 110 Stat. 1214 (1996), a defendant has one year from the date his conviction becomes final to file a petition for habeas relief. Nevertheless, AEDPA provides several exceptions. *Wims v. United States*, 225 F.3d 186, 190 (2d Cir.2000). One such exception restarts the statute of limitations period from "the date on which the factual predicate of the claim or claims presented could have been discovered through the exercise of due diligence." 28 U.S.C. § 2244(d)(1)(D).

[2-4] Petitioner invokes this factual predicate exception. Specifically, he alleges that he did not become aware of the relevant evidence until he viewed the film *Capturing the Friedmans* on January 10, 2003. Nevertheless, petitioner's *Brady*

3. On January 18, 2006, petitioner submitted an application for leave to appeal to the New York Court of Appeals, but the application was unauthorized under N.Y. Criminal Procedure Law §§ 450.10 & 450.15 and was dismissed on May 24, 2006, see *People v. Friedman*, 6 N.Y.3d 894, 817 N.Y.S.2d 629, 850

claim was untimely because, although he knew, or should have known through the exercise of due diligence, that the prosecution may have withheld the relevant information when or soon after he viewed the film on January 10, 2003, he failed to file a habeas petition within one year of that date. Instead, on January 7, 2004, three hundred and sixty-two days after petitioner first viewed *Capturing the Friedmans*, he filed a post-judgment motion to vacate his conviction. This ultimately unsuccessful effort to obtain relief ended on March 10, 2006, when the Appellate Division denied his application for leave to appeal. Petitioner then had three days remaining within the statutory period to file a writ of habeas corpus. Petitioner did not file the petition until June 23, 2006, more than three months late.<sup>3</sup>

[5] A claim of actual innocence could provide a basis for excusing this late filing even though petitioner pled guilty. See *Doe v. Menefee*, 391 F.3d 147, 161 (2d Cir.2004). While petitioner did not expressly raise such a claim, he argues that the allegations contained in the petition, along with evidence submitted in support of those allegations, were sufficient to alert the district judge to consider actual innocence as a basis for excusing his untimely filed petition. We need not resolve the issue here, however, because we conclude that, even if the petition is deemed to be timely, petitioner's *Brady* claim fails on the merits.

[6-9] Under AEDPA, to prevail on a petition for a writ of habeas corpus, a petitioner confined pursuant to a state

N.E.2d 676 (2006). An effort to exhaust state remedies by procedures that are not authorized by state law does not toll the one-year statute of limitations. See *Artuz v. Bennett*, 531 U.S. 4, 9, 121 S.Ct. 361, 148 L.Ed.2d 213 (2000); see also *Geraci v. Senkowski*, 211 F.3d 6, 9 (2d Cir.2000).

court judgment must show that the court's "adjudication of the claim . . . resulted in a decision that was contrary to, or involved an unreasonable application of, clearly established Federal law, as determined by the Supreme Court of the United States." 28 U.S.C. § 2254(d)(1). "[C]learly established Federal law" refers to holdings of the Supreme Court, as opposed to dicta, as of the time of relevant state court decisions. *Carey v. Musladin*, 549 U.S. 70, 74–75, 127 S.Ct. 649, 166 L.Ed.2d 482 (2006); *Williams v. Taylor*, 529 U.S. 362, 412, 120 S.Ct. 1495, 146 L.Ed.2d 389 (2000). A decision is "contrary to" federal law "if the state court arrives at a conclusion opposite to that reached by [the Supreme Court] on a question of law or if the state court decides a case differently than [the Supreme Court] has on a set of materially indistinguishable facts." *Williams*, 529 U.S. at 413, 120 S.Ct. 1495. An "unreasonable application" occurs when a "state court identifies the correct governing legal principle . . . but unreasonably applies that principle to the facts of the [petitioner's] case." *Id.* "Unreasonableness is determined by an 'objective' standard." *Gersten v. Senkowski*, 426 F.3d 588, 607 (2d Cir.2005) (quoting *Williams*, 529 U.S. at 409, 120 S.Ct. 1495). Moreover, the Supreme Court has held that "unreasonableness" should not be conflated with "clear error" because "[t]he gloss of clear error fails to give proper deference to state courts." *Lockyer v. Andrade*, 538 U.S. 63, 75, 123 S.Ct. 1166, 155 L.Ed.2d 144 (2003).

[10] In *United States v. Ruiz*, 536 U.S. 622, 122 S.Ct. 2450, 153 L.Ed.2d 586 (2002), the Supreme Court reaffirmed its earlier holding that a defendant is entitled to information necessary to ensure that his plea is voluntary, and that any related waiver of his rights are made "knowing[ly], intelligently[ly], [and] with sufficient aware-

ness of the relevant circumstances and likely consequences." *Id.* at 629, 122 S.Ct. 2450 (quoting *Brady v. United States*, 397 U.S. 742, 748, 90 S.Ct. 1463, 25 L.Ed.2d 747 (1970)) (alterations in original). Nevertheless, because "impeachment information is special in relation to the *fairness of a trial*, not in respect to whether a plea is *voluntary* ('knowing,' 'intelligent,' and 'sufficient[ly] aware')," *Ruiz*, 536 U.S. at 629, 122 S.Ct. 2450 (emphasis in original), the Supreme Court held that the failure to disclose such information prior to a guilty plea does not violate the Due Process Clause. While the Supreme Court acknowledged that "the more information the defendant has, the more aware he is of the likely consequences of a plea, waiver, or decision, and the wiser that decision will likely be," it held that "the Constitution does not require the prosecutor to share all useful information with the defendant." *Id.*; *cf. Padilla v. Kentucky*, — U.S. —, 130 S.Ct. 1473, 1480, 176 L.Ed.2d 284 (2010) (holding that because "deportation is an integral part . . . of the penalty that may be imposed on noncitizen defendants who plead guilty to specified crimes," defense counsel must apprise a pleading defendant of that consequence (footnote omitted)).

[11] Petitioner characterizes the use of hypnosis as "exculpatory" evidence, a type of material *Ruiz* did not explicitly address. We disagree. The fact that hypnosis may have been used to stimulate memory recall and potentially induce false memories of abuse is a circumstance that would fit comfortably under the general understanding of impeachment evidence—evidence that "is offered to 'discredit a witness . . . to reduce the effectiveness of [her] testimony by bringing forth evidence which explains why the jury should not put faith in [her] or [her] testimony.'" *Chiasson v. Zapata Gulf Marine Corp.*, 988 F.2d 513, 517 (5th

Cir.1993) (alterations in original). There are generally five types of evidence used for this purpose, one of which relates to the capacity of a witness to observe, remember, or recount events. 3 Christopher B. Mueller & Laird C. Kirkpatrick, *Federal Evidence* § 6.75, at 504 (3d ed.2007).

[12] Even if hypnosis evidence comes within *Brady*'s broader definition of exculpatory evidence, the petition must still be denied. Before *Ruiz*, in proceedings to which the AEDPA standard of review did not apply, we held that “[t]he government’s obligation [under *Brady*] is pertinent not only to an accused’s preparation for trial but also to his determination of whether or not to plead guilty.” *United States v. Avellino*, 136 F.3d 249, 255 (2d Cir.1998).<sup>4</sup> Petitioner is correct that *Ruiz* did not expressly abrogate this holding as applied to all *Brady* material. Nevertheless, the Supreme Court has consistently treated exculpatory and impeachment evidence in the same way for the purpose of defining the obligation of a prosecutor to provide *Brady* material prior to trial, see *United States v. Bagley*, 473 U.S. 667, 676, 105 S.Ct. 3375, 87 L.Ed.2d 481 (1985);

4. Some commentators argue that, because not all of the reasoning in *Ruiz* would “apply with equal force to disclosure of purely exculpatory information,” it is “unclear whether *Ruiz* overrules all of the Second Circuit precedent in this area or whether the Second Circuit’s recognition of a right to disclosure of purely exculpatory information prior to a guilty plea survives.” Gordon Mehler, John Gleeson, & David C. James, *Federal Criminal Practice: A Second Circuit Handbook*, § 18–6, at 302 (10th ed.2010). Specifically, they refer to the Supreme Court’s observation that impeachment information provides limited help to defendants at the plea stage and a rule requiring disclosure prior to trial would potentially endanger government witnesses whose identities were disclosed prior to trial. See *id.* (citing *Ruiz*, 536 U.S. at 629–32, 122 S.Ct. 2450.) “The same reasoning would not apply with equal force to disclosure of purely exculpatory information, since such informa-

*Giglio v. United States*, 405 U.S. 150, 153–54, 92 S.Ct. 763, 31 L.Ed.2d 104 (1972), and the reasoning underlying *Ruiz* could support a similar ruling for a prosecutor’s obligations prior to a guilty plea, see 6 W. LaFave, J. Israel, N. King, & O. Kerr, *Criminal Procedure* § 24.3(b), at 369 (3d ed.2007).<sup>5</sup>

We need not, however, address this issue here. It is enough to say that the holding of the Nassau County Court, consistent with prior holdings of the Appellate Division from which this case arises, see, e.g., *People v. Day*, 150 A.D.2d 595, 541 N.Y.S.2d 463, 467 (2d Dep’t 1989),<sup>6</sup> does not constitute an “unreasonable application” of Supreme Court precedent as 28 U.S.C. § 2254(d)(1) requires. See, e.g., *Carey*, 549 U.S. at 77, 127 S.Ct. 649 (“No holding of this Court required the [state] Court of Appeal to apply the test of [prior holdings to the] conduct [relevant] here. Therefore, the state court’s decision was not contrary to or an unreasonable application of clearly established federal law.”); see also *Rodriguez v. Miller*, 537 F.3d 102, 106 (2d Cir.2008). Indeed, in a pre-AEDPA habeas corpus case, decided prior to

tion would presumably be of greater assistance to a defendant in deciding whether to plead guilty and would not necessarily create a danger to government witnesses.” *Id.*

5. This reading of *Ruiz* finds support in its additional holding, “for most (though not all) of the reasons” given for its holding relating to impeachment evidence, rejecting the argument that the Constitution requires the pre-plea disclosure of information supporting any affirmative defense. *Ruiz*, 536 U.S. at 633, 122 S.Ct. 2450.

6. Although the New York Court of Appeals has never addressed the issue of whether *Brady* material must be disclosed to a defendant prior to a guilty plea, various departments of the Appellate Division are split on this issue. See 7 N.Y. Prac., *New York Pretrial Criminal Procedure* § 11:15 n. 12 (citing cases).

*Ruiz*, the Fifth Circuit held that a defendant's *Brady* claim was not cognizable on habeas review because the application of *Brady* to a guilty plea would, at best, constitute a "new rule—one that seeks to protect a defendant's own decision making regarding the costs and benefits of pleading and of going to trial." *Matthew v. Johnson*, 201 F.3d 353, 362 (5th Cir.2000) (en banc). Thus, even if petitioner succeeds in establishing his actual innocence as a predicate to avoiding the time-bar, the petition would have to be denied.

## II.

While the law may require us to deny relief in this case, it does not compel us to do so without voicing some concern regarding the process by which the petitioner's conviction was obtained. The magnitude of the allegations against petitioner must be viewed in the context of the late-1980's and early-1990's, a period in which allegations of outrageously bizarre and often ritualistic child abuse spread like wildfire across the country and garnered world-wide media attention. See, e.g., Susan Bandes, *The Lessons of Capturing the Friedmans: Moral Panic, Institutional Denial and Due Process*, 3 Law Culture & Human. 293, 294 (2007) (noting that the accusations against Arnold and Jesse Friedman arose at "a time at which concern about day care sexual abuse had reached a fever pitch both in the United States and abroad"). The media sensa-

tionalized these allegations, generating a national perception that sex rings were widespread and had infiltrated average communities. See, e.g., Devil Worship: Exposing Satan's Underground, Geraldo Rivera (NBC television broadcast Oct. 28, 1988).

Vast moral panic fueled a series of highly-questionable child sex abuse prosecutions.<sup>7</sup> See Samuel P. Gross, *Exonerations in the United States 1989 through 2003*, 95 J.Crim. L. & Criminology 523, 539–40 (2005). See generally Dorothy Rabinowitz, No Crueler Tyrannies: Accusation, False Witness, and Other Terrors of Our Times (2003). By 1991, for example, 25 percent of prosecutors had handled at least one case involving satanic abuse. See Elizabeth F. Loftus & Deborah Davis, *Recovered Memories*, 2 Annu. Rev. Clin. Psychol. 469, 477 (2006). Although many of these cases included "fantastical accusations," such as those of satanic abuse—a strand of accusations which has been discredited entirely—others involved allegations of real and serious crimes committed in an impossible manner. Bandes, *supra*, at 301. In the Fells Acre case, for example, Gerald Amiraults, a member of a family which owned the Fells Acre pre-school, allegedly "plunged a wide-blade butcher knife into the rectum of a 4-year-old boy, which he then had trouble removing." Dorothy Rabinowitz, *Martha Coakley's Convictions*, Wall St. J., Jan. 15, 2010, at A19. According to a child witness, a teach-

7. See, e.g., *Commonwealth v. Amirault*, Nos. 85–69, 85–70, 85–72, 85–75, 85–77, 85–80, 85–2653, 85–2654, 85–2657, 85–2659, 85–2662, 85–2668 (Mass.Super. Ct. Middlesex County 1985), 424 Mass. 618, 677 N.E.2d 652 (1997) ("Fells Acre case"); *State v. Jones*, 71 Ohio St.3d 293, 643 N.E.2d 547 (1994); *State v. Michaels*, 264 N.J.Super. 579, 625 A.2d 489 (1993) ("Wee Care Nursery School case"); *State v. Kelly*, No. 91–CRS–4250–4363 (N.C.Super.Crim.Ct. Apr. 22, 1992) ("Little Rascals Day Care case"); *State v. Fijnje*, No.

89–43952 (Fla. Cir. Ct. Dade County May 4, 1991) ("Old Cutler Presbyterian case"); *People v. Buckley*, No. A–750900, A–753005 (Cal. Mun. Ct. L.A. County 1984), No. A–A750900 (Cal.Super. Ct. L.A. County 1990) ("McMartin Preschool case"); *State v. Fuster*, No. 84–19728 (Fla. Cir. Ct. Dade County Oct. 9, 1985) ("Country Walk Babysitting Service case"); *People v. Kniffen*, Nos. 33610, 33624, 33700 (Cal. Mun. Ct. Kern County), No. 24208 (Cal.Super. Ct. Kern County 1982) ("Bakersfield case").

er in the school saw Amiraaults with the knife, asked what he was doing, and then told him not to do it again. “On this testimony, Gerald was convicted of a rape which had, miraculously, left no mark or other injury.” *Id.*

Overall, at least seventy-two individuals were convicted in nearly a dozen major child sex abuse and satanic ritual prosecutions between 1984 and 1995, although almost all the convictions have since been reversed. *See Gross, supra*, at 540 & n. 40. Some defendants, fearing trial, pled guilty or “no contest” to impossible acts of ritualistic abuse, and in some cases they provided detailed confessions in exchange for immunity or generous plea bargains. *See Debbie Nathan & Michael Snedeker, Satan’s Silence: Ritual Abuse and the Making of a Modern American Witch Hunt 160–77 (1995)*. Many have described these widespread prosecutions as a modern-day “witch hunt.” *See generally, e.g., Richard Guilliatt, Talk of the Devil: Repressed Memories and the Ritual Abuse Witch-Hunt (1996); Nathan & Snedeker, supra; Elizabeth Loftus & Katherine Ketcham, The Myth of Repressed Memory: False Memories and Allegations of Sexual Abuse (1994); Richard A. Gardner, Sex Abuse Hysteria: Salem Witch Trials Revisited (1992)*.

These prosecutions were largely based on memories that alleged victims “recovered” through suggestive memory recovery tactics, including those petitioner claims were used in this case. Indeed, the dramatic increase in conspiratorial charges of child sexual abuse has been traced to a relatively small group of clinical psychologists who supported the psychoanalytic notion of “repressed memories” and encouraged patients to employ extensive “memory recovery procedures” to “break through the barrier of repression and bring memories into conscious

awareness.” Loftus & Davis, *supra*, at 470–71, 483–86; *see also* Kamala London et al., *Disclosure of Child Sexual Abuse: What Does the Research Tell Us About the Ways Children Tell?*, 11 *Psychol. Pub. Pol. & L.* 194, 213 (2005). Popular memory recovery procedures included hypnosis, age regression, dream interpretation, guided abuse-related imagery, use of photographs to trigger memories, journaling, and interpretation of symptoms as implicit memories. Loftus & Davis, *supra*, at 483–84. These procedures and others commonly employed have great potential to induce false memories. *See id.* at 484. Hypnosis, for example, has been shown to produce bizarre and impossible memories, including memories of ritualistic satanic abuse, memories from early infancy, memories from past lives, and memories from the future. *Id.*; *see also Rock v. Arkansas*, 483 U.S. 44, 59–61, 107 S.Ct. 2704, 97 L.Ed.2d 37 (1987); *Borawick v. Shay*, 68 F.3d 597, 603–04 (2d Cir.1995). The prevailing view is that the vast majority of traumatic memories that are recovered through the use of suggestive recovery procedures are false, and that almost all—if not all—of the recovered memories of horrific abuse from the late-1980’s and early-1990’s were false. *See id.* at 477.

Moreover, many highly-publicized and large-scale investigations into alleged child abuse conspiracies were also accompanied by a variety of interviewing techniques designed to assist children in recalling abuse—techniques which an extensive body of research suggests can induce false reports. *See, e.g., Sena Garven et al., More Than Suggestion: The Effect of Interviewing Techniques From the McMartin Preschool Case*, 83 *J. Applied Psychol.* 347, 347 (1998). Garven et al. describes a “package” of techniques that, although based on a different highly-publicized

1980's abuse case,<sup>8</sup> are remarkably similar to the techniques employed in petitioner's case. The package included (1) "Suggestive Questions," (2) "Other People" (telling the child that the interviewer has already received information from other people regarding the topics of the interview), (3) "Positive and Negative Consequences" (responding positively to accusations of abuse and negatively to denials of abuse), (4) "Asked-and-Answered" (re-asking a child a question he or she has already unambiguously answered), and (5) "Inviting Speculation."<sup>9</sup> *Id.* at 348–50.

Scholars have suggested that each interviewing technique can induce false reports on its own. For example, they cite research which indicates that children often change their answer when asked the same question more than once during an interview, either because they assume that the first answer was incorrect or because they would like to please the adult interviewer. *See* Thomas D. Lyon, *Applying Suggestibility Research to the Real World: The Case of Repeated Questions*, 65 *Law & Contemp. Probs.* 97, 106 (2002). But the techniques have their greatest impact in combination. Garven et al. examined the effect of the "package" of techniques described above on false allegations of wrongdoing compared with suggestive questioning alone. *See* Garven et al., *supra*, at 350. They found that children exposed to the package of techniques falsely alleged wrongdoing over three times as

often (58 percent of the time, compared to 17 percent of the time). *Id.* at 354. This error rate of nearly 60 percent occurred after less than five minutes of exposure to the combined techniques. *Id.* Though the study examined children who were somewhat younger than the complainants in petitioner's case, *see id.* at 350, the results are instructive as to the general dangers of suggestive interviewing techniques.

Finally, once individuals "recovered" memories of abuse or otherwise labeled themselves victims of abuse, they were generally encouraged to participate in various activities on an individual and community level to reinforce and develop existing memories of abuse. Loftus & Davis, *supra*, at 483. There, proponents of recovered memories advised alleged victims to expand on existing memories through suggestive memory recovery procedures (both in and out of therapy), participation in survivor groups, and solicitation of consistent information from others, "all with significant potential both to bias construction of historical narratives and to lead to confabulation of false memories." *Id.* When allegations of abuse span an entire community, these activities can provide an outlet for community reinforcement—an outlet which can strengthen survivor identities and foster the collective growth of increasingly inaccurate memories. *See id.*

[13–15] When viewed in its proper historical context, petitioner's case appears as

8. The techniques were based on those used in the McMartin Preschool case, *People v. Buckley*, No. A750900 (Cal.Super.Ct.1990), in which seven teachers were accused of abusing several hundred children over a ten-year period. None of the teachers were actually convicted. The case, which took place in a Los Angeles suburb, began in 1983 and ran through 1990, and it remains one of the longest and most expensive trials in California history. *See* Garven et al., *supra*, at 347.

9. These interviewing techniques are consistent with the theory that child abuse victims tend to deny abuse at first but will eventually admit abuse if repeatedly questioned. This theory, known as child sexual abuse accommodation syndrome ("CSAAS"), is now highly controversial. *See* London et al., *supra*, at 195–96. Indeed, empirical support for the theory was largely based on children who claimed they had experienced ritualistic satanic abuse. *See id.* at 211–13.

merely one example of what was then a significant national trend. This was a “heater case”—the type of “high profile case” in which “tremendous emotion is generated by the public.” *Bandes, supra*, at 310. In heater cases, the criminal process often fails:

Emotions like fear, outrage, anger and disgust, in situations like these, are entirely human. The question is what the legal system can do to correct for the excesses to which they lead. The crux of the moral panic dynamic is that the legal system, in such cases, does not correct for them. It gets swept up in them instead.

*Id.* at 312. The record in this case suggests this is precisely the moral panic that swept up Nassau County law enforcement officers. Perhaps because they were certain of Arnold Friedman and petitioner’s guilt, they were unfazed by the lack of physical evidence, and they may have felt comfortable cutting corners in their investigation. After all, “[t]horoughness is a frequent casualty of such cases.” *Id.* at 309. The actions of the prosecution are also troubling. In representing the sovereign, a prosecutor is a “servant of the law, the twofold aim of which is that guilt shall not escape or innocence suffer.” *Berger v. United States*, 295 U.S. 78, 88, 55 S.Ct. 629, 79 L.Ed. 1314 (1935). “[W]hile [a prosecutor] may strike hard blows, he is not at liberty to strike foul ones. It is as much his duty to refrain from improper methods calculated to produce a wrongful conviction as it is to use every legitimate means to bring about a just one.” *Id.* Thus, prosecutors have an obligation to curb police overzealousness. In this case, instead of acting to neutralize the moral panic, the prosecution allowed itself to get swept up in it.

Petitioner has come forward with substantial evidence that flawed interviewing

techniques were used to produce a flood of allegations, which the then-District Attorney of Nassau County wrung into over two hundred claims of child sexual abuse against petitioner. Petitioner never had an opportunity to explore how the evidence against him was obtained. On the contrary, the police, prosecutors, and the judge did everything they could to coerce a guilty plea and avoid a trial. Thus, with the number of counts in the indictments and Judge Boklan’s threat to impose the highest conceivable sentence for each charge, petitioner faced a virtually certain life sentence if he was convicted at trial. And the likelihood that any jury pool would be tainted seemed to ensure that petitioner would be convicted if he went to trial, regardless of his guilt or innocence. Nor could he have reasonably expected to receive a fair trial from Judge Boklan, the former head of the Nassau County District Attorney’s Sex Crime Unit, who admitted that she never had any doubt of the defendant’s guilt even before she heard any of the evidence or the means by which it was obtained. Even if innocent, petitioner may well have pled guilty.

[16] As such, this case is unlike other appeals which raise concerns about the quality of the evidence and the guilt of the defendant. In those appeals, we defer to the judgment of the jury after the defendant has received a fair trial. We take comfort in “[t]he established safeguards of the Anglo-American legal system [which] leave the veracity of a witness to be tested by cross-examination, and the credibility of his testimony to be determined by a properly instructed jury.” *Hoffa v. United States*, 385 U.S. 293, 311, 87 S.Ct. 408, 17 L.Ed.2d 374 (1966). In this case, the quality of the evidence was extraordinarily suspect and never subjected to vigorous cross-examination or the judgment of a properly instructed jury.

[17] Judge Friendly observed in his seminal essay on habeas corpus that, “[a] remedy that produces no result in the overwhelming majority of cases, . . . an unjust one to the state in much of the exceedingly small minority, and a truly good one only rarely, would seem to need consideration with a view to caring for the unusual case of the innocent man without being burdened by so much dross in the process.” See Henry J. Friendly, *Is Innocence Irrelevant? Collateral Attack on Criminal Judgments*, 38 U. Chi. L.Rev. 142, 148 (1970) (footnote omitted). The Supreme Court has not finally resolved the issue of whether there is a federal Constitutional right to be released upon proof of actual innocence. As Chief Justice Roberts recently observed, “Whether such a federal right exists is an open question. We have struggled with it over the years, in some cases assuming, *arguendo*, that it exists while also noting the difficult questions such a right would pose and the high standard any claimant would have to meet.” *District Attorney’s Office v. Osborne*, — U.S. —, 129 S.Ct. 2308, 2321, 174 L.Ed.2d 38 (2009) (citations omitted).

Nevertheless, even if we also assumed that such a federal right exists, and that petitioner could meet the “high standard any claimant would have to meet” to obtain relief, we could not reach that issue here. This is so because petitioner has not exhausted that claim in the New York State courts even though the New York cases suggest that relief on this basis may be available pursuant to N.Y.Crim. P. § 441.10(1)(h). See, e.g., *People v. Day*, 26 Misc.3d 1205(A), 2009 WL 5191433, \*13 (N.Y. County Ct. Dec. 31, 2009); *People v. Bermudez*, No. 8759/91, 2009 WL 3823270, \*22 (N.Y.Sup.Ct. Nov. 9, 2009); *People v. Wheeler-Whichard*, 25 Misc.3d 690, 884 N.Y.S.2d 304, 313 (Sup.Ct.2009); *People v. Bozella*, 25 Misc.3d 1215(a), 2009 WL 3364575, \*16 (N.Y. County Ct. Oct. 14,

2009); *People v. Cole*, 1 Misc.3d 531, 765 N.Y.S.2d 477, 484–85 (Sup.Ct.2003). Considering the facts of the case and the circumstances that caused him to plead guilty, this case may be one in which the New York courts may be particularly sympathetic to a proceeding seeking such relief.

[18] The focus on the impediment to legal relief, however, should not obscure the continuing ethical obligation of the District Attorney to seek justice. We refer here especially to New York Rules of Professional Conduct 3.8, Comment 6B, which explains that “[t]he prosecutor’s duty to seek justice has traditionally been understood not only to require the prosecutor to take precautions to avoid convicting innocent individuals, but also to require the prosecutor to take reasonable remedial measures when it appears likely that an innocent person was wrongly convicted.” N.Y. Rules Prof’l Conduct 3.8, cmt. 6B. In language particularly pertinent here, the Comment goes on to say:

[W]hen a prosecutor comes to know of new and material evidence creating a reasonable likelihood that a person was wrongly convicted, the prosecutor should examine the evidence and undertake such further inquiry or investigation as may be necessary to determine whether the conviction was wrongful. The scope of the inquiry will depend on the circumstances. In some cases, the prosecutor may recognize the need to reinvestigate the underlying case; in others, it may be appropriate to await development of the record in collateral proceedings initiated by the defendant. The nature of the inquiry or investigation should be such as to provide a “reasonable belief” . . . that the conviction should or should not be set aside.

*Id.*

The record here suggests “a reasonable likelihood” that Jesse Friedman was

wrongfully convicted. The “new and material evidence” in this case is the post-conviction consensus within the social science community that suggestive memory recovery tactics can create false memories and that aggressive investigation techniques like those employed in petitioner’s case can induce false reports. Indeed, it is not even clear from the record that Assistant District Attorney Onorato was aware of the suggestive questioning techniques that were used by the Nassau County police.<sup>10</sup> More importantly, the record does not speak to whether the then—District Attorney of Nassau County, whose principal role was administering and overseeing the activities of one of the largest such offices in the United States,<sup>11</sup> was aware of the techniques used by the Nassau County detectives, who were not members of his staff.

Only a reinvestigation of the underlying case or the development of a complete record in a collateral proceeding can provide a basis for determining whether petitioner’s conviction should be set aside. We hope that, even if she continues to oppose relief in collateral legal proceedings, the current Nassau County District Attorney, who was not responsible for the investigation and prosecution of Jesse

Friedman, will undertake the kind of complete review of the underlying case suggested in the Comment to Rule 3.8.

### III.

We add these brief words in response to Judge Raggi’s concurring opinion. While she joins in the affirmance in the denial of the writ, she questions the need to “engage in a lengthy discussion of the facts and circumstances that Friedman asserts led to his conviction,” and she expresses understandable concern that these facts and circumstances were not developed at an evidentiary hearing. Concurring Op., *ante* at 161–62. Nevertheless, she agrees with us that “the facts alleged are disturbing and may well warrant further inquiry by a responsible prosecutor’s office,” although she “cannot predict whether the outcome of any such inquiry will be favorable to petitioner, whose conviction is based on a plea of guilty that he thereafter publicly confirmed.” *Id.*

Notwithstanding her reluctance to join “in the remainder of the opinion” beyond the discussion necessary to resolve petitioner’s *Brady* claim, it bears emphasizing that all three members of the panel are in agreement that this case “may well warrant further inquiry by a responsible pros-

10. Although there are conflicting affidavits relating to whether Assistant District Attorney Onorato was aware of the videotape made by the mother of Gary Meyers, a former computer student, which vividly illustrates the suggestive techniques that the Nassau County detectives employed to elicit accusations from Arnold Friedman’s former students, Onorato filed an affidavit denying knowledge of the videotape or that petitioner’s attorney informed him that “police officers were using inappropriate interviewing techniques.” [Onorato Aff. ¶ 5–6, A–869.]

11. The population of Nassau County in the late 1980s was approximately 1.3 million—the same as it is today. *See* 1 Nassau County

Community Health Assessment, 2010 Update, Demographic & Health Resource Data, at 4, *available at* <http://www.nassaucountyny.gov/agencies/Health/documents/VolumeOne-DemographicandHealthResourceDataCHA2010-2013withCoverPage.pdf>. The staff of the District Attorney’s Office today exceeds 370. *See* Nassau County District Attorney, ADA Career Opportunities, *available at* [http://www.nassaucountyny.gov/agencies/da/ada\\_career.html](http://www.nassaucountyny.gov/agencies/da/ada_career.html). While statistics relating to the size of the District Attorney’s Office are not available for the period during which the events at issue took place, the fact that the population of Nassau County has remained stable, combined with a reduced crime rate

ecutor's office." *Id.* We are likewise in agreement that it is not possible to "predict whether the outcome of any such inquiry will be favorable to petitioner." *Id.* Moreover, we too would have preferred if the facts and circumstances were developed at a hearing. Nevertheless, we could not order a hearing over the objection of the District Attorney, who declined to waive the defense of the statute of limitations and permit such a hearing to be held.

Under these circumstances, the purpose of our "lengthy discussion of the facts and circumstances that Friedman asserts led to his conviction," *id.*, is to make the case that a "further inquiry by a responsible prosecutor's office" is justified despite a guilty plea entered under circumstances which clearly suggest that it was not voluntary. Indeed, passing over all of the pressures described above that were brought to bear on petitioner, the threat Judge Boklan made to petitioner's counsel, Peter Panaro, that, "if Jesse were to go to trial, she intended to sentence him to consecutive terms of imprisonment for each count that he was convicted on" [Pet'r Aff. ¶ 26, A-156; Panaro Aff. ¶ 11, A-764] would be sufficient by itself to sustain a challenge to the plea if Panaro's affidavit is credited.<sup>12</sup> Moreover, petitioner offered a plausible explanation for his post-plea admission. Specifically, he made up a story attributing his conduct to the fact that he was molested by his father as a child in the hope that it might insulate him from attacks in prison and might persuade Judge Boklan to ask the parole board for leniency on his behalf.

and serious fiscal problems, if anything, suggests that the size of the office has not grown.

12. See *Gains v. Murray*, No. 03-CV-016A, 2008 WL 4890249, at \*5 (W.D.N.Y. Nov.12, 2008) (collecting and summarizing New York caselaw regarding the propriety of comparable judicial threats); see, e.g., *People v. Stevens*, 298 A.D.2d 267, 748 N.Y.S.2d 589, 590-91 (1st Dep't 2002) (holding that a defendant is coerced into pleading guilty when a trial

In sum, an appellate court faced with a record that raises serious issues as to the guilt of the defendant and the means by which his conviction was procured, yet unable to grant relief, is not obligated to become a silent accomplice to what may be an injustice.

### CONCLUSION

The judgment of the district court is **AFFIRMED**.

REENA RAGGI, Circuit Judge,  
concurring in part:

I join only in so much of the court's opinion as holds (1) that petitioner's *Brady* claim is untimely and (2) that this court need not decide whether to excuse such untimeliness on actual innocence grounds because the *Brady* claim does not merit habeas corpus relief in any event. To reach these conclusions, the court need not engage in a lengthy discussion of the facts and circumstances that Friedman asserts led to his conviction, much less assume the truth of those facts or the misconduct of police officers, prosecutors, defense counsel, and the presiding state court judge before a hearing. Accordingly, I do not join in the remainder of the opinion. While the facts alleged are disturbing and may well warrant further inquiry by a responsible prosecutor's office, I cannot predict whether the outcome of any such inquiry will be favorable to petitioner, whose conviction is based on a plea of

judge indicates that the defendant is likely to receive a much heavier sentence after trial); cf. *Fielding v. LeFevre*, 548 F.2d 1102, 1106 (2d Cir.1977) ("[The trial judge's] alleged threat of a more severe sentence should [the defendant] go to trial[, i]f true, . . . would establish a *per se* violation of the defendant's Sixth Amendment right to a trial, and require resentencing before a different judge [for a defendant who went to trial].").

guilty that he thereafter publicly confirmed.



**George M. CHAVIS, Plaintiff-Appellant,**

v.

**P. CHAPPIUS, P. Corcoran, S. Skowly, J. Northrop, R. Barnard, C. Retrossi, C. Kerbein, C. Washburn, P. Jayne, E. Delany, M. Delaro, T. Hana, T. Morton, M. Miles, J. Ayers, R. Squires, M. Deburgomaster, S. Hodge, B. Brandt, Walsh, Jillston, B. Wolnarek, Angie, Carpenter, Shumaker, J. Irrizarry, Furhman, M. McGinnis, H.A. Collect, D. Selsky, J. Escrow, Defendants,**

**Andrew M. Cuomo, Attorney General of the State of New York, Amicus Curiae.\***

**Docket No. 07-2304-pr.**

United States Court of Appeals,  
Second Circuit.

Argued: June 17, 2010.

Decided: Aug. 17, 2010.

**Background:** Prisoner filed action against corrections officers claiming, inter alia, that he had been beaten and denied medical treatment by staff members and officials of correctional facility. The United States District Court for the Western District of New York, Elfvin, J., denied prisoner's motion to proceed in forma pauperis (IFP) and Siragusa, J., denied prisoner's motion for reconsideration and dismissed complaint. Prisoner appealed.

\*The clerk of court is directed to amend the

**Holdings:** The Court of Appeals, Calabresi, Circuit Judge, held that:

- (1) complaint and subsequent appeal therefrom qualified as separate "strikes" if both were dismissed for reasons listed in three strike rule;
- (2) district court abused its discretion in denying motion brought by prisoner, who was subject to three strike rule, for leave to amend; and
- (3) prisoner with three strikes who adequately alleged imminent danger could proceed IFP in same suit on other claims that lacked nexus to imminent danger.

Vacated and remanded.

### 1. Federal Courts ⇌817

The denial of leave to amend a complaint is reviewed for abuse of discretion.

### 2. Federal Courts ⇌776

De novo review applies to a district court's ruling pursuant to the three strike rule under the Prison Litigation Reform Act (PLRA) which denies in forma pauperis status to indigent prisoners who have repeatedly brought legal claims dismissed as frivolous, malicious, or not stating a claim of the option of deferring to pay filing fees under a structured payment plan. 28 U.S.C.A. § 1915(g).

### 3. Federal Civil Procedure ⇌2734

Complaint and subsequent appeal therefrom qualified as separate "strikes" if both were dismissed for reasons listed in three strike rule under Prison Litigation Reform Act (PLRA) which denied in forma pauperis status to indigent prisoners who had repeatedly brought legal claims dismissed as frivolous, malicious, or not stating claim of option of deferring to pay

official caption accordingly.

No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

EASTERN District of NEW YORK  
CRIMINAL Division

THE UNITED STATES OF AMERICA

vs.

ARNOLD FRIEDMAN,  
Defendant

**INDICTMENT**

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §2252(a)  
(2), 2252(b) and 3623)

A true bill  
*James Boston*  
Foreman

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 19 \_\_\_\_\_

\_\_\_\_\_  
Clerk

Bail, \$ \_\_\_\_\_

\_\_\_\_\_

Kevin O'Regan - AUSA- 330-7053

LER:KO:scw  
F.#  
K01/14

CR 87-00742

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

COSTANTINO

----- X

UNITED STATES OF AMERICA

I N D I C T M E N T

-against-

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §2252(a)  
(2), 2252(b) and 3623).

ARNOLD FRIEDMAN,

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

On or about and between October 1, 1984 and December 31, 1984, both dates being approximate and inclusive, within the Eastern District of New York, the defendant ARNOLD FRIEDMAN did knowingly and wilfully receive visual depictions of minors engaged in sexually explicit conduct, to wit, the May edition of the COQ Courier, which visual depictions had been transported and shipped in foreign commerce and the production of which involved the use of minors engaging in such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)).

COUNT TWO

On or about February 8, 1986, within the Eastern District of New York, the defendant ARNOLD FRIEDMAN did knowingly and wilfully ship via the United States mail visual depictions of a minor engaged in sexually explicit conduct, to wit, a magazine

entitled Joe and His Uncle, the production of which involved the use of a minor engaging in such conduct.

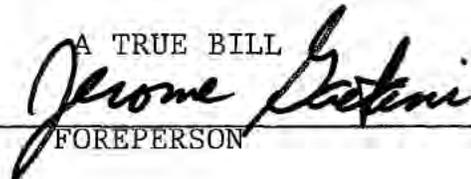
(Title 18, United States Code, Sections 2252(a)(1), 2252(b) and 3623)).

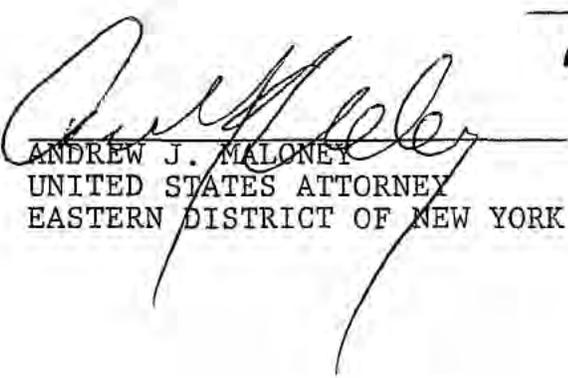
COUNT THREE

On or about November 3, 1987, within the Eastern District of New York, the defendant ARNOLD FRIEDMAN did knowingly and wilfully receive visual depictions of a minor engaged in sexually explicit conduct, to wit, a magazine entitled Joe and His Uncle, which visual depictions had been transported and shipped via the United States mail and the production of which involved the use of a minor engaging in such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)).

A TRUE BILL

  
FOREPERSON

  
ANDREW J. MALONEY  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

-against-

ARNOLD FRIEDMAN and JESSE  
FRIEDMAN,

Defendants.

THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, accuse the defendant  
ARNOLD FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE,  
committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the  
1st day of September, 1987 to on or about the 25th day of November,  
1987, in the County of Nassau, State of New York, engaged in  
deviate sexual intercourse with Barry Doe, a person less than  
eleven years old, to wit: the defendant did contact the victim's  
anus with the defendant's penis.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment,  
further accuse the defendant, ARNOLD FRIEDMAN, of the crime of  
SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the  
1st day of April, 1987 to on or about the 30th day of June, 1987,  
in the County of Nassau, State of New York, engaged in deviate  
sexual intercourse with Kenneth Doe, a person less than eleven  
years old, to wit: the defendant did contact the victim's anus  
with the defendant's penis.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment,  
further accuse the defendant, ARNOLD FRIEDMAN, of the crime of  
SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the  
1st day of April, 1987 to on or about the 30th day of June, 1987,  
in the County of Nassau, State of New York, engaged in deviate  
sexual intercourse with Kenneth Doe, a person less than eleven  
years old, to wit: the defendant did contact the victim's anus  
with the defendant's penis.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, knowing the character and content thereof he employed, authorized, or induced Kenneth Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, knowing the character and content thereof he employed, authorized, or induced Kenneth Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, subjected Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, subjected Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County of Nassau, State of New York, subjected Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987,

in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1985 to on or about the 1st day of January, 1986, in the County of Nassau, State of New York, subjected Joseph Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected Kenneth Doe, a person less than eleven years old, to sexual contact, to wit: the victim did touch the defendant's penis.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected a person less than eleven years old, to sexual contact, to wit: Kenneth Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected Kenneth Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, on or about the 27th day of May, 1985, in the County of Nassau, State of New York, subjected William Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986 to on or about the 30th day of January, 1987, in the County of Nassau, State of New York, subjected William Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, attempted to subject Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, attempted to subject Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim the defendant's penis.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people and did show the victim the defendant's penis.

TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim.

TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of December, 1984 to on or about the 1st day of July, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled "Strip Poker" depicting a naked female.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of December, 1984 to on or about the 1st day of July, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled "Stroker" depicting a hand masturbating a penis.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1985 to on or about the 1st day of July, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled "Hands on X" depicting naked people.

TWENTY NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1985 to on or about the 1st day of January 1986, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Dirty Movie depicting a naked woman touching her vagina and a video disc entitled Stroker depicting a hand masturbating a penis.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1985 to on or about the 1st day of January, 1986, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Girls They Want to Have Fun depicting a naked woman masturbating.

THIRTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of December, 1984 to on or about the 31st day of January, 1986 in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see the following video discs: 1-Strip Poker, depicting a naked female, 2-Stroker, depicting a hand masturbating a penis, 3-Hands on X, depicting naked people, 4-Dirty Movie, depicting a naked woman touching her vagina and 5-Girls They Want to Have Fun, depicting a naked woman masturbating.

THIRTY SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant made the victim show the defendant his penis.

THIRTY SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim.

THIRTY EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim.

THIRTY NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim, the defendant made the victim show the defendant his penis and the defendant did show the victim magazines containing pictures of naked people.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, on or about the 27th day of May, 1985, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of a child less than sixteen years of age in the victim's presence.

FORTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, on or about the 27th day of May, 1985, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did place his penis between the buttocks of seven boys less than sixteen years of age in the victim's presence.

FORTY SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1985 to on or about the 30th day of April, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Sex Style Test which asked sexually related questions.

FORTY THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of Jesse Friedman in the victim's presence.

FORTH FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch his penis to the anus of Jesse Friedman in the victim's presence.

FORTY FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of Arnold Friedman in the victim's presence.

FORTY SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch his penis to the anus of Arnold Friedman in the victim's presence.

FORTY SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD, FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Mad Party Fucker depicting a story of an orgy at a mansion.

FORTY EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did slam the head of a child less than sixteen years of age into a wall and told the class that this is what would happen to people who told what was going on in the victim's presence.

FORTY NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of a child less than sixteen years of age in the victim's presence.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

FIFTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch his penis to the anus of a child less than sixteen years of age in the victim's presence.

### FIFTY SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1985, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did the following: 1-the defendant did touch the penis of a child less than sixteen years of age in the victim's presence; 2-the defendant did place his penis between the buttocks of seven boys less than sixteen years of age in the victim's presence; 3-the defendant permitted the victim to see a video disc entitled Sex Style Test which asked sexually related questions; 4-the defendant did touch the penis of Jesse Friedman in the victim's presence; 5-the defendant did touch his penis to the anus of Jesse Friedman in the victim's presence; 6-the defendant permitted the victim to see a video disc entitled Mad Party Fucker depicting a story of an orgy at a mansion; 7-the defendant did slam the head of a child less than sixteen years of age into a wall and told the class that this is what would happen to people who told what was going on in the victim's presence; 8-the defendant did show the victim magazines containing pictures of naked people and 9-the defendant did touch his penis to the anus of a child less than sixteen years of age in the victim's presence.

### FIFTY THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did the following: 1-the defendant did touch the penis of Arnold Friedman in the victim's presence; 2-the defendant did touch his penis to the anus of Arnold Friedman in the victim's presence and 3-the defendant did touch the penis of a child less than sixteen years of age in the victim's presence.

### FIFTY FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

All of the acts and transactions alleged in each of the several counts in this indictment are connected together and form part of a common scheme and plan.

Dated: December 7, 1987

*Denis Dillon* JRO  
DENIS DILLON  
District Attorney

67430

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

-against-

ARNOLD FRIEDMAN and JESSE FRIEDMAN,

Defendant s .

THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant, ARNOLD FRIEDMAN did contact the victim's anus with the defendant ARNOLD FRIEDMAN'S penis while the defendant JESSE FRIEDMAN covered the victim's mouth.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant, ARNOLD FRIEDMAN did contact the victim's anus with the defendant ARNOLD FRIEDMAN'S penis while the defendant JESSE FRIEDMAN was telling the victim to be quiet.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, with the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, with the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, with the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March,

1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Richard Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December,

1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's buttocks.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant, ARNOLD FRIEDMAN did touch the victim's buttocks after the defendant, JESSE FRIEDMAN, had pulled the victim's pants down.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis with the defendant's penis.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's buttocks.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

TWENTY—SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant, ARNOLD FRIEDMAN, did touch the victim's penis while the defendant, JESSE FRIEDMAN, held the victim.

TWENTY—SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant, ARNOLD FRIEDMAN, did touch the victim's penis while the defendant, JESSE FRIEDMAN did touch the victim's buttocks with the defendant, JESSE FRIEDMAN'S, penis.

TWENTY—EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWENTY—NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, subjected Keith Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Keith Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, attempted to subject Richard Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, attempted to subject Richard Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, attempted to subject Richard Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's anus with the defendant's finger.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc depicting naked people.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant place his hand down the pants of several boys.

FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's penis being touched by several boys.

FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see a computer disc depicting naked people; 2) the victim observed the defendant place his hand down the pants of several boys; 3) the victim observed the defendant hit several boys and 4) the victim observed the defendant's penis being touched by several boys.

FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant hit the victim.

FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim was told by the defendant to pull his pants down.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see magazines depicting pictures of naked people.

FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant ARNOLD FRIEDMAN order a boy into a corner of a room where the defendant, ARNOLD FRIEDMAN, told him to remove his pants and rub his exposed penis up against the wall while the defendant, JESSE FRIEDMAN, touched his exposed penis to the boy's buttocks.

FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina; 2) the defendant hit the victim; 3) the victim observed the defendant's exposed penis; 4) the victim observed the defendant touch his penis to a boy's back; 5) the victim was told by the defendant to pull his pants down; 6) the defendant permitted the victim to see magazines containing pictures of naked people and 7) the victim observed the defendant order a boy into a corner of a room where the defendant told him to remove his pants and rub his exposed penis up against the wall while JESSE FRIEDMAN touched his exposed penis to the boy's buttocks.

FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his exposed penis to a boy's buttocks.

FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant hit the victim.

FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: 1) the defendant hit the victim; 2) the victim observed the defendant's exposed penis; 3) the victim observed the defendant touch his penis to a boy's back; 4) the victim observed the defendant hit several boys; 5) the victim observed the defendant touch his exposed penis to a boy's buttocks after ARNOLD FRIEDMAN had ordered the boy into a corner of a room and told him to remove his pants and rub his exposed penis up against the wall.

FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see computer discs depicting naked people.

SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, knowingly acted in a

manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see computer discs depicting naked people.

SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch a boy's penis.

SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant, ARNOLD FRIEDMAN, contact a boy's anus with the defendant's penis while the defendant, JESSE FRIEDMAN, held the boy.

SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see computer discs depicting naked people; 2) the victim observed the defendant's exposed penis; 3) the victim observed the defendant touch a boy's penis; 4) the victim observed the defendant contact a boy's anus with the defendant's penis while JESSE FRIEDMAN held the boy.

SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Richard Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant, ARNOLD FRIEDMAN, place his mouth on the defendant, JESSE FRIEDMAN'S, penis with his permission.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Stephen Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Strip Poker" depicting a naked female.

SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Stroker" depicting a hand masturbating a penis.

SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see magazines containing pictures of naked people.

SEVENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant stroking his exposed penis.

SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see a computer disc entitled "Strip Poker" depicting a naked female; 2) the defendant permitted the victim to see a computer disc entitled "Stroker" depicting a hand masturbating a penis; 3) the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina; 4) the defendant permitted the victim to see magazines containing pictures of naked people and 5) the victim observed the defendant stroking his exposed penis.

SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Load Me" depicting a man and a woman engaged in sexual intercourse.

SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see magazines containing pictures of naked people.

SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see magazines containing pictures of naked people.

SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's penis being touched by several boys.

EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's penis being touched by several boys.

EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina; 2) the defendant permitted the victim to see a computer disc entitled "Load Me" depicting a man and a woman engaged in sexual intercourse; 3) the defendant permitted the victim to see magazines containing pictures of naked people; 4) the victim observed the defendant's exposed penis and 5) the victim observed the defendant's penis being touched by several boys.

EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and

moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see magazines containing pictures of naked people; 2) the victim observed the defendant's exposed penis and 3) the victim observed the defendant's penis being touched by several boys.

EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the defendant did hit the victim.

EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's penis being touched by several boys.

EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's penis being touched by several boys.

NINTITEH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: 1) the defendant did hit the victim; 2) the victim observed the defendant hit several boys; 3) the victim observed the defendant's exposed penis and 4) the victim observed the defendant's penis being touched by several boys.

NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and

moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: 1) the victim observed the defendant's exposed penis and 2) the victim observed the defendant's penis being touched by several boys.

All of the acts and transactions alleged in each of the several counts in this indictment are connected together and form part of a common scheme and plan.

Dated: February 1, 1988

*Denis Dillon*  
DENIS DILLON  
District Attorney

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

- against -

JESSE FRIEDMAN and [REDACTED]  
[REDACTED]

Defendants

Ind  
69283

THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED], individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant [REDACTED] was holding the victim.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] a juvenile offender, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant [REDACTED] did contact the victim's anus with the defendant [REDACTED]'s penis while the defendant FRIEDMAN was holding the victim.

#### FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] a juvenile offender, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

#### FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant [REDACTED] was holding the victim.

#### SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant [REDACTED] did contact the victim's anus with the defendant [REDACTED] penis while the defendant FRIEDMAN held the victim.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant [REDACTED] held the victim.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant [REDACTED] held the victim.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED] individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant [REDACTED] did contact the victim's anus with the defendant [REDACTED]'s penis while the defendant FRIEDMAN held the victim.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and [REDACTED], individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by John Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while John Roe held the victim.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by John Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while Wayne Roe held the victim..

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Wayne Roe held the victim.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or

about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Arnold Friedman held the victim.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Arnold Friedman held the victim.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], individually, and aiding and abetting and being aided and abetted by Wayne Roe from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Wayne Roe held the victim.

TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] individually, and aiding and abetting and being aided and abetted by Wayne Roe from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] individually and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis while Wayne Roe held the victim.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of

March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Wayne Roe held the victim.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe by forcible compulsion.

THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of

April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe by forcible compulsion.

THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

THIRTY-FIFTH

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

THIRTY-SIXTH

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, compelled another to engage in deviate sexual intercourse with James Doe by forcible compulsion.

FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with James Doe by forcible compulsion.

FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Lawrence Doe by forcible compulsion.

FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Lawrence Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Lawrence Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986; in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SEVENTH-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986,

in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate

sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDREDTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED THIRTY-EIGHTY COUNT

AND THE GRAND JURY OF THE CO [REDACTED] by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st

day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, by forcible compulsion.

ONE HUNDRED FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-SECOND COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-THIRD COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

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ONE HUNDRED SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the

County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-EIGHTH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-NINTH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SEVENTY-SECOND COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SEVENTY-SEVENTH COUNT

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ONE HUNDRED SEVENTY-EIGHTH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the

County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED NINETIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced William Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim engaged in a game entitled "Simon Says" wherein acts of sexual abuse were committed.

ONE HUNDRED NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced William Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim engaged in a game entitled "Leap Frog" wherein acts of sexual abuse were committed.

ONE HUNDRED NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced William Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim engaged in a game entitled "Super Hero" wherein acts of sexual abuse were committed.

ONE HUNDRED NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by [REDACTED]

ONE HUNDRED NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by [REDACTED]

ONE HUNDRED NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

ONE HUNDRED NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

ONE HUNDRED NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

ONE HUNDRED NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE SECOND DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, being eighteen years old or more, compelled others to engage in deviate sexual intercourse with James Doe, a person less than fourteen years old, to wit: the defendant compelled other children to contact their penis' to the anus of the victim.

TWO HUNDRED SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SODOMY IN THE SECOND DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, being eighteen years old or more, compelled others to engage in deviate sexual intercourse with James Doe, a person less than fourteen years old, to wit: the defendant did place his mouth on the victim's penis.

TWO HUNDRED SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, subjected William Doe, a person less than eleven years old to sexual contact, to wit: the defendant did rub his penis on the victim's back.

TWO HUNDRED EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, subjected Lawrence Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, subjected Lawrence Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis.

TWO HUNDRED ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis.

TWO HUNDRED TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis.

TWO HUNDRED THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the victim touched the defendant's penis.

TWO HUNDRED FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant [REDACTED] of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the victim touched the defendant's penis.

TWO HUNDRED FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis to the victim's penis.

TWO HUNDRED SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, [REDACTED], from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, subjected Patrick Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE SECOND DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, subjected James Doe, a person less than fourteen years old to sexual contact, to wit: the defendant touched his penis to the victim's back.

TWO HUNDRED TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of SEXUAL ABUSE IN THE SECOND DEGREE, committed as follows:

The defendant [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, subjected James Doe, a person less than fourteen years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Leap Frog".

TWO HUNDRED TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Leap Frog".

TWO HUNDRED TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Leap Frog".

TWO HUNDRED TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Super Hero".

TWO HUNDRED THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Super Hero".

TWO HUNDRED THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

TWO HUNDRED THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant masturbating into a cup.

TWO HUNDRED THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED].

TWO HUNDRED THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED].

TWO HUNDRED THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED].

TWO HUNDRED THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Hora Bora Alice".

TWO HUNDRED FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Leap Frog", wherein sexual acts were committed.

TWO HUNDRED FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Leap Frog", wherein sexual acts were committed.

TWO HUNDRED FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Leap Frog", wherein sexual acts were committed.

TWO HUNDRED FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Super Hero", wherein sexual acts were committed.

TWO HUNDRED FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Super Hero", wherein sexual acts were committed.

TWO HUNDRED FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant masturbating into a cup.

TWO HUNDRED FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Hora Bora Alice", wherein sexual acts were committed.

TWO HUNDRED FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant masturbating into gum and then distributing it to children to chew.

TWO HUNDRED FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant licking out M & M's from a child's underpants.

TWO HUNDRED FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact a child's anus with the defendant's penis.

TWO HUNDRED FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hold a child while that child placed his mouth on the penis of [REDACTED].

TWO HUNDRED FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact the anus of a child with the defendant's penis.

TWO HUNDRED FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of [REDACTED]

TWO HUNDRED SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to children.

TWO HUNDRED SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SEVENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers", wherein sexual acts were committed.

TWO HUNDRED SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers", wherein sexual acts were committed.

TWO HUNDRED SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers", wherein sexual acts were committed.

TWO HUNDRED SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

TWO HUNDRED SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

TWO HUNDRED SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Strip Poker" depicting a naked female.

TWO HUNDRED SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Stroker", depicting a hand masturbating a penis.

TWO HUNDRED SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed a child placing his mouth on the penis of the defendant while JESSE FRIEDMAN held the child.

TWO HUNDRED EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact the defendant's penis to the anus of a child.

TWO HUNDRED EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact the defendant's penis to the anus of a child.

TWO HUNDRED EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED], of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Nude Limbo" wherein children were naked.

TWO HUNDRED EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner

likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers" wherein sexual acts were committed.

TWO HUNDRED NINTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED], from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers" wherein sexual acts were committed.

TWO HUNDRED NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers" wherein sexual acts were committed.

TWO HUNDRED NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim pictures of naked people.

TWO HUNDRED NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant directed a child to stand in the corner of the room and rub his exposed penis up against the wall.

TWO HUNDRED NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Strip Poker" depicting a naked female.

TWO HUNDRED NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Sex Style Test" which asked sexually related questions.

TWO HUNDRED NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

TWO HUNDRED NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

TWO HUNDRED NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

TWO HUNDRED NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

THREE HUNDREDDTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, [REDACTED] of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, [REDACTED] from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

THREE HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Patrick Doe, a male child, less than sixteen years old, to wit: the defendant showed him pictures of naked people.

THREE HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Patrick Doe, a male child, less than sixteen years old, to wit: the defendant showed him pictures of naked people.

All of the acts and transactions alleged in each of the several counts of this indictment are connected together and form part of a common scheme and plan.

Dated: November 7, 1988

*Denis Dillon*  
DENIS DILLON  
District Attorney

6/12/03

"CAPTURING THE FRIEDMANS" - TRANSCRIPT

LOGO: HBO Documentary Films

LOGO: Magnolia Pictures

TITLE: A Film By Andrew Jarecki

JESSE:

(home video footage)

Hi, hi. It's me. Oh, we're not ready yet? Hi.  
Hi. It's me, Jesse. Are we-- we there? Yeah.  
Okay. Good. We're there. Well, this afternoon  
after a very lousy sketch about yo-yoing I figure  
we'll, for lack of anything better to do, we'll  
take it towards a more serious side right about  
now. And we're going to conduct an interview  
with Arnold Friedman... Ta Da... my father.

JESSE (VO):

I still feel like I knew my father very well. I  
don't think that just because there were things  
in his life that were private and secret and

shameful that that means that the father who I knew and the things I knew about him were in any way not real.

## OPENING CREDITS:

CAPTURING THE FRIEDMANS

ARNOLD

ELAINE

DAVID

SETH

JESSE

## SONG LYRICS:

(MUSIC) *They're gonna put me in the movies.  
They're gonna make a big star out of me. We'll  
make a film about a man that's sad and lonely.  
And all I have to do is act naturally.  
Well I'll bet you I'm a gonna be a big star.  
Might win an Oscar, you can never tell. The  
movie's gonna make me a big star, 'cause I can  
play the part so well. Well, I hope you come to  
see me in the movie. Then I'll know that you*

*will plainly see, the biggest fool that's ever hit the big time. And all I have to do is act naturally.*

ELAINE:

Arnold liked pictures. I mean, that's, let's face it. He liked pictures.

ARNOLD:

(home movie footage)

Well, we're here. This is it, the whole family assembled. Everybody in Great Neck, New York.

(MUSIC)

HOME MOVIE CARDS:

CARD #1

"PECULIAR WARNING: THIS SHOW MAY BE HAZARDOUS TO YOUR HEALTH"

CARD #2

"CAST PICKED AT RANDOM FROM THE FUNNY FARM"

CARD #3

"PHOTOGRAPHY BY ARNOLD FRIEDMAN"

ELAINE:

We had three sons. David being the oldest had a

lot of responsibility when he was young. Seth was an outright rebel. And somehow Jesse was just like the, the one that, that keeps trying to catch up and doesn't quite make it (MUSIC ENDS).

DAVID:

I have very good memories of the, of, of my, well. I have very good memories of my childhood. I had a great time growing up. We had a great, I had a great time because of my friends. And my father was, was, was great. I mean, he may not have been the best father, but, but, but he, he went to Columbia University. And then when he graduated he went to the Catskills to play in his band.

SONG LYRICS:

(MUSIC) *The Jazzbo Mambo with the boogie beat is the newest dance on 52nd Street.*

DAVID:

The band was called Arnito Rey and his Orchestra. My father's name was Arnold Friedman. This was in the late 40's and early '50s. So he played Latin music. It was very big at the time. And so

he changed his name to Arnito Ray.

SONG LYRICS:

*They're doing Jazzbo Mambo eight to the bar.*

DAVID:

I don't know. My dad was a cool guy, you know? He was a schoolteacher. And I think that the other kids liked him, and he liked kids. But he didn't like spending a lot of time with his wife, so he would teach high school during the day, and then after school he would come home and teach piano lessons and later computer lessons in the house. And that was, of course, more time he didn't have to spend with his wife.

ELAINE:

I'm not that anxious to talk about his father because, you know, we were divorced, and... But his father, he would ... I don't really want to talk about it.

ARNOLD:

(home movie footage)

In case anybody didn't know, I'm the father of this family. I'm never in the movies. Never see

me in any of the pictures. But I really am the father. And we're all gathered together while David is messing up the camera here. No, he's taking a good movie and zooming in and out. When you see me on this, you're gonna say... (LAUGHS). Okay, shut it.

DAVID:

He died of a surprise heart attack about five years ago. And it was very, very sad. He was, you know, selfless and altruistic.

ANDREW (OC):

But in the end, he wasn't together with your mom?

DAVID:

He wasn't together with my mom at the end.

ANDREW (OC):

And when did they make the decision not to be together? Long before he died?

DAVID:

Couple years before his death. There's a lot I... There's a... well, whatever. There's some things I don't want to talk about.

(MUSIC)

DAVID:

(home video footage)

Well, this is, this is private, so if you don't, if you're not me then you really shouldn't be watching this because this is supposed to be a private situation between me and me. This is between me now and me in the future. So turn it off. Don't watch this. This is private. If you're the fucking, oh, god, the cops. And if you're the fucking cops, go fuck yourselves. Go fuck yourselves because you're full of shit.

JOHN MCDERMOTT:

Back in 1984, US Customs had seized some child pornography addressed from the Netherlands in the mail to Arnold Friedman. Now, he never got that piece of mail, but his name was forwarded on to us. So what we would do then would be to initiate a correspondence with Arnold in the hopes that we can determine if he is in fact willing to violate the statute again about mailing or receiving child pornography.

"Dear Stan, the book is Joe, 14, and his uncle. I think I'd like you to send me something, sort of good faith, and I will forward this rather precious book to you. Thanks. Arnie."

ELAINE:

See, it's very hard to believe that this so-called "good marriage" was so disturbed. He sent him these pictures, and he sent him a note that I remember 'cause the lawyer got the note. And then he wrote, "Enjoy."

JOHN MCDERMOTT:

Since he had sent the magazine he was always asking for it back. So I asked the prosecutors, "Let's grant him his wish. He wants his magazine back." I dressed up as a mail carrier, knocked on his door, asked him if he was Arnold Friedman. He replied he was. And I said, "I have a package for you. Sign right here." He did.

About an hour later we went back. We would give him some time with the magazine. I'm dressed now, I just put a blue suit jacket over the

carrier's uniform. And I told him, "I have a search warrant for child pornography." He says, "There's nothin' like that here." And I said, "You don't recognize me?" I'd just been at his door an hour ago. He goes, "No." And I took off my jacket, and I said, "Now do you recognize me?" "Oh, yeah. Oh, okay. The magazine is upstairs."

So we went up to his bedroom. In the top dresser door was the open magazine. Well, he thought we would take the magazine and leave. And I said, "No. No, we have a search warrant. We're gonna search the whole house for child pornography." And around that time his wife showed up.

ELAINE:

I thought they were searching like for marijuana or something. I didn't know what they were searching for to tell you the truth. And I thought it was a big mistake.

JOHN MCDERMOTT::

One of the first things we went to was his office. And I remember just as I was about to

pull out a drawer Mr. Friedman came rushing in and said, "Wait. I'll get that for you." And there wa-- and said, "Here. This is, this is all that's there." And it was one piece of mail from the Netherlands, but it was child pornography. And he said, "That's it. That's all there is." And I said, "Well, that's great, Mr. Friedman, but we're still gonna search." And he goes, "I don't, I don't understand why you don't, why don't you go when I tell you that's all there is." And I said, "Well, we don't believe you."

ELAINE:

Well, it's not something he sort of left lying around on the kitchen table. He wasn't proud of it, and he kept it hidden. He had his office downstairs. It wasn't like right there. You had to go downstairs and around the corner to get to his office. And he said, we used to have someone that cleaned. He says, "Don't let her clean in here. It's okay. I don't want my things disturbed." So alright, I never went in there.

JOHN MCDERMOTT:

Then one of our inspectors moved the piano that was in that office. And that's where his stash of magazines were held, behind the piano.

ELAINE:

And this was Arnold's secret. He liked to look at pictures of boys. And it's not that he acted on these things. He, he just wanted to, to look at these pictures and meditate or ...

JOHN MCDERMOTT:

And these are listings of the magazines that were found behind the piano. "Young Boys and Sodomy," "Incest Case Histories," something called "Chicken Pickin's Magazine." And in addition to that we found evidence of a computer class being taught there by Mr. Friedman. And we did seize some list of names that we thought could be students. I remember walking in there saying, "God damn. We could have a problem here."

FRAN GALASSO:

Just when you think everything is going to be dull something gets dropped on your lap, you

know, and it turns out to be something bigger than you ever, than you ever thought. What happened was one of the detectives from the vice squad came in to see me. And he had a list. And it was at that point that we were able to learn that these were computer classes that went on literally every day of the week and Saturday. And we drew a big map of the whole village of Great Neck, sectioned it off, and started sending detectives out to do interviews.

ANTHONY SGUEGLIA:

She set us up in teams - male/female teams. And we got a list of alleged victims. Soon as we went into the house we were usually approached by the mothers. And we explained why we're there, what we're doing there, and we'd really like to talk to their children, preferably alone.

FRAN GALASSO:

The parents were becoming impatient. They wanted something done immediately. But you always want to be very careful about how you proceed because the one thing that you worry about, and I know I

worried about it all the time, is -- just charging somebody with this kind of a crime is enough to ruin their lives. So you want to make sure that you have enough evidence and that you're convinced that you're making a good charge.

ANDREW (OC):

And how much time was there between the time that the postal inspector searched the house and the time that you went in for the second search?

FRAN GALASSO:

Well, it would have been less than a month because we did that the day before Thanksgiving.

MALE NEWS ANCHOR:

A prominent middle-aged teacher in a prosperous Long Island town is charged with sodomizing young boys who were his students.

FEMALE REPORTER:

Police are charging that sexual abuse went on behind the doors of 17 Picadilly Road in Great Neck.

FRAN GALASSO:

We rang the doorbell. As soon as he realized who it was, he wasn't gonna let us in. So one of the detectives broke the door down. And we went into the premises at that point. Arnold was by himself. His wife was out shopping.

ELAINE:

I was out to the store to buy a Thanksgiving turkey. And I go up the front walk to the house and there're people all over the house. And my husband is sitting, looking very sheepishly in the dining room -- handcuffed.

FRAN GALASSO:

By this time just about every news organization you could name had arrived on the scene.

DAVID

I went home for Thanksgiving. Got to the house, and there's cops and news trucks all over the place. And I got worried, of course.

JOSEPH ONORATO:

When David came to the house, we were able to ascertain eventually the type of business he was

in. And we heard that he was involved in children's entertainment in the form of some sort of clown activities.

ANTHONY SGUEGLIA:

I was there when the clown came in. He was ranting and raving. We had words. And I was going through the folders. We told him to take a hike.

FRAN GALASSO:

And he kept trying to come into the house, and I kept telling him that he couldn't, that he had to leave. He wasn't, wasn't allowed while we were searching. And finally he, he came in for the last time. He bent down. I really thought he had a weapon in that duffle bag. Everybody kind of, you know, reached for a, a gun at one point. He came out -- what he came out with was a pair of Fruit of the Loom underwear. And he started prancing around, flailing his arms in the air saying, "Look at me. Look at me. I'm an asshole. I'm an asshole."

DAVID:

(news footage)

They're harassing my father for no reason at all.

DAVID:

If I had had a, some kind of Arabian sand scarf I would have wrapped that around my face and been Lawrence of Arabia, which might, maybe that would have been better. But I took out underwear and I put it on my head because I didn't want to be on camera.

FEMALE REPORTER:

The first arrested was Arnold Friedman, a retired schoolteacher who was charged with sodomizing boys aged 8 to 11.

FRAN GALASSO:

(news footage)

The charges are that while running a computer school, Arnold Friedman and his son engaged in various forms of sexual abuse against minor children.

DAVID:

Jesse pulls up coming home from school. His

friends dump him out of the car.

JESSE:

David sort of grabbed me and we were sitting a couple of houses down sort of on the sidewalk. And he was saying something to me. And then the, one of the TV cameras came over, so we kind of ran to the backyard. And we went behind the house. And we were in the backyard of our house.

DAVID:

And then cops came back, and they said, "What's going on here?" And I said, "Don't worry about it. It's just me and Jesse." And they said, "Well, we want Jesse, we need Jesse in the house now." Of course, we thought, you know, we didn't know why that was.

JOSEPH ONORATO:

As we conducted more interviews of the children, Jesse's name started to pop up. And, and Jesse was there. And what did Jesse do? And then eventually we were able to ascertain that Jesse's role was not one of, you know, helping his dad conduct the computer class but basically abusing

the children himself.

FRAN GALASSO:

We didn't have children telling us that, that Arnold had slapped them around. But quite a number of the kids reported incidents of being slapped and having their hair pulled or their arms twisted by Jesse. He was by far the more violent one.

JUDD MALTIN:

All these policemen said that Jesse was some kind of aggressor. That even his father was cowering, and Jesse was this sexual, molesting tyrant. I challenge anyone to find anyone who Jesse had even teased as a child or called a name. Jesse was not an angry person. He was not an upset person. So we ended up spending a lot of time together. I was over his house three days a week, four days a week. And as far as I know him, none of this ever happened. Not on my watch.

FEMALE NEWS REPORTER:

Eighteen-year-old Jesse Friedman also stands

accused of sex abuse and using a child in a sexual performance.

JESSE:

The only thought that I just kept having the whole night was "we're gonna get bailed out and then we'll go home, and we'll figure out what's going on. And the lawyers will take care of this. And they'll straighten this out." Because it was still just a matter of, "This is a big misunderstanding." But when the bail was set at a million dollars, instead of going out with Mom and David like we were supposed to, we went back the other way. And that was the moment when there was this whole new sense that the problem was much worse than I originally thought.

(MUSIC)

FRAN GALASSO:

The investigation didn't end at that point. That really was the arrest and the search of the house. And then we went on because we had literally at that point dozens more interviews to do.

ELAINE:

Somewhere along the way, I think it was the Nassau County cops. They showed me this magazine, and they said, "You see? Look at this magazine." And they showed me the magazine. They were embarrassed to show it to me because of what the pictures were. And you know, I didn't see it. My eyes were in the right direction, but my brain saw nothing. Because when it was all over the lawyer showed me the magazine, and then I saw it. For the first time I really saw it. And I just, I couldn't believe what I saw.

I, I mean, I had no concept that this thing even exists in the world. That this magazine would even be in the world. This is, I mean, we had a middle-class home, educated. I had a good family, right? Where did this come from?

FAMILY FRIEND:

(home movie footage)

Mr. and Mrs. Friedman's house on this most beautiful Thanksgiving dinner.

GRANDMA:

(home movie footage)

(IN PROGRESS) For my daughter, for my son-in-law,  
and, and for my three grandsons.

JESSE (as a child):

(home movie footage)

I'm thankful that both my brothers are home. And  
I...

ELAINE:

(home movie footage)

I'm most thankful to my husband, to Arnie.

VOICES:

(home movie footage)

Aw.

REPORTER (OC):

(news footage)

Anything you want to say, Mr. Friedman? Are you  
guilty? Did you do all they say you did?

ARNOLD:

(news footage)

No comment.

HOWARD FRIEDMAN:

I was the first to visit my brother in prison. And that was a, a moment in my life I'll never forget. He came into the room. I was sitting at this table. And a lot of tables. And they were crowded. Just awful surroundings. And he didn't have his glasses on. Without his glasses he was blind as a bat. They'd taken them off and broken them, stepped on them. He had a smell of urine. They were throwing urine at him. They were threatening to throw him down the stairs. They knew what he was in there for. The media, it was all over the media. And he was half-blind and hadn't shaved in two days and shivering and cold and scared out of his wits. The first words out of his mouth were, "Howie, they're gonna kill me. They're gonna kill me. Get me out of here."

COURT CLERK:

(news footage)

The People versus Arnold Friedman and Jesse Friedman. Indictment 67430. Step up, please.

FEMALE NEWS REPORTER:

(news footage)

So began the very first time cameras were permitted in a Nassau County courtroom. Fifty-six year old Arnold Friedman and his 18-year-old son Jesse heard the court clerk read off a 91-count indictment charging them with sodomy and sexual abuse.

COURT CLERK:

(news footage)

Arnold Friedman, how do you plead to this indictment? Guilty? Or not guilty?

ARNOLD:

(news footage)

Not guilty.

COURT CLERK:

(news footage)

And Jesse Friedman, how do you plead to this indictment ...

JESSE:

(news footage)

Not guilty.

COURT CLERK:

(news footage, overlapping)

... Guilty? Or not guilty?

HOWARD FRIEDMAN:

My brother and Jesse kept saying they're innocent. "This is trumped up charges." And they got a McMartin's. You know, they, they somehow got one kid to, to, they got the police to be able convince the kids, "Well, all of your friends said something happened. Didn't something happen? Something must have happened," et cetera, et cetera. And they were convinced. They, they kept saying they were innocent. And I just kept thinking, "I have to believe them."

FRAN GALASSO:

It's very hard for people to accept him as a, as a pedophile. Arnold Friedman was an award-winning teacher. All over the house were plaques and newspaper articles written about him. He had been given an award, "Computer Teacher of the Year." He also taught piano.

(PIANO MUSIC)

ELAINE:

David plays beautifully. And his father taught him how to play the piano.

DAVID:

It was when he died that I realized how much of an impact he had on my life.

ARNOLD (OC):

(home movie footage)

Take a bow (LAUGHTER).

DAVID:

He, he was very supportive of my magic when I was a kid. (MUSIC) When I was about six, my father took me to a magic show. And it's probably my earliest memory.

ELAINE:

You know when your son goes to college and you say, "Go to college. And, and what are you gonna be? Be a doctor. Be a lawyer." I tried to make him into a doctor or a lawyer (LAUGHS).

DAVID:

You know, my mom would always say, you know, "Get a job. Get a job." But my dad would say to me,

"You know, David. I can't tell you what to do because you know what I did when I got out of college." He blew off his chemical engineering degree, which he could have worked for an oil company and made tons of money. Instead, he played in the mountains, which is a total blow-off, follow your dream, artistic thing. And I totally love him for that.

FATHER OF COMPUTER STUDENT:

Trust your children to somebody who was a schoolteacher for over 20, 30 years. A member of your community. All you heard were accolades about this person. And now all of a sudden he's a monster. And things that were being said, you know, upset the community because you don't expect that here.

ELAINE:

(MUSIC) Great Neck is a peninsula. It's a very insulated community. This was a, a certain kind of person that lived in Great Neck.

JOSEPH ONORATO:

It's on the North Shore of Long Island, which is

usually a predominately wealthy area. These are wealthy, professional people that have garnered a great deal of income in their lives. And they live accordingly.

ANTHONY SGUEGLIA:

Nice community. Tight. Affluent. Well-kept homes.

DAVID:

They get dressed up to go shopping. They, they want to be sure they get seen by the people they want to see. And cars are important. Clothes are important.

FATHER OF COMPUTER STUDENT:

There's a lot of competition in Great Neck. Everybody's kid's a genius and the best. And everybody's the best in this and that. And you just want your kid to be happy and to get an array of experiences. And this computer class was one of those experiences. You thought you were doing right.

JOSEPH ONORATO:

Most of the children started out explaining how

Mr. Friedman would try to test them I think, in my opinion, as to whether they'd be receptive to some of his advances. There'd be certain showings on the computer during computer class of certain material that was inappropriate for children.

FRAN GALASSO:

If you were going to be the first one abused on a particular day, he would pull up a chair and sit next to you. Maybe it would start with his arm around your shoulder or on your leg and gradually move it up touching private parts.

JOSEPH ONORATO:

And then over the course of time we developed a situation where we found out that there was not only sexual touching of the genitals, but there were acts of sodomy, oral and anal sodomy, that took place during the course of the class.

ANDREW (OC):

So were the kids abused in the computer room in view of everyone else?

FORMER COMPUTER STUDENT #1:

From what I saw in my sessions none were raped out on the floor. The kids were raped in Jesse's room or the bathroom.

ANDREW (OC):

Just to change the subject for a second, there were these sexual computer games that were discussed during the course of the case.

FORMER COMPUTER STUDENT #1:

We'd basically do the games where there would be naked girls and everything -- in the computer class. But I remember one time I slipped one of the games out, and I brought it home and everything. And I copied it. And Arnold found out. Because of that I was raped by him and Jesse at the same time as punishment to that. I never did it again. He made me format it. I formatted it. I had to bring my computer in and show him that I hadn't brought it home. So he was absolutely positive, 100 percent that it was not touched at all in any way, form, shape whatsoever.

ANDREW (OC):

And how did he know that you brought it home?

FORMER COMPUTER STUDENT #1:

'Cause the, he accounted for all the disks that were there. And since he flipped through, he's like, "Who the fuck took this? Tell me now or I'm gonna kill you all!" And he had a knife, and he was waving a knife around. I was like, "I did it. I did it. I did it."

RON GEORGALIS:

My general recollection of the classes, is basically a positive one, is a pleasant one. The types of behaviors which were described, which were, well, just downright satanic in nature. I mean, they make him sound like some kind of brutal sadist, where as I had just always thought of him as being kind of a, a nebbish.

FORMER COMPUTER STUDENT #2:

(on telephone)

I think as someone who took the classes it was just hard to picture even that going on because I did have a good experience. And I didn't, you

know, see anything, you know, remotely like, you know, like, like child molestation or child abuse or any, child-anything going on.

RON GEORGALIS:

What took place in Arnold's classes was pretty much just straight computer lessons. I mean, as ordinary and as boring as you could possibly imagine it.

FRAN GALASSO:

It was just generally a free-for-all because it was, everybody could, could see what was, what was going on. And very often they would participate in these, these, sort of, mass games in, in the classroom.

ANTHONY SGUEGLIA:

There was a game there that was called "leapfrog." And this one really got to me. It was, they would play leapfrog in the class. They'd actually have their clothes off. And we, we associate leapfrog like you do when you were a kid, one guy jumping over another guy. But the fact is, it means everybody's butt's up in the

air, so to speak.

RON GEORGALIS:

The very nature of these charges is so absurd. It, it seems almost like some kind of grotesque fantasy.

FORMER COMPUTER STUDENT #1:

Yeah. Leapfrog. I remember about that. It's kind of like Twister where we would have to sit down. Our asses would be in the air. Arnold and Jesse would leap from one person to another sticking their dick each in our ass.

ANDREW (OC):

But then I was confused because you said, "No kids were raped in the computer room."

FORMER COMPUTER STUDENT #1:

The leapfrog game, which was not molestation, was a leapfrog game, was not considered molestation, was done outside. But that was, that was a, that was a group game. The actual molestation, one-on-one contact, happened in the bathroom. The game happened out on the floor.

SCOTT BANKS:

One of the things you, you sit down there, and I know I've, you know, think about this, you know, "How could this go on in, in this home for so long and, and not be, you know, come out?" But, you know, that's, that's a, that's a, that wasn't my province. That wasn't what I had to decide or the judge had to decide. You know, that's up to someone else to decide that.

But if I recall, you know, the children were pretty vivid in their recollections as to what Arnold and or Jesse did to them. And Judge Boklan, you know, she's a pretty strong-willed judge. And she's pretty unmovable when she makes her decision.

JUDGE ABBEY BOKLAN:

There was never a doubt in my mind as to their guilt. And remember, I'd been around for a while. This wasn't, you know, the first sex case that I had ever seen. In fact, my previous law secretary used to tease me that we were the

pervert part. And having been, you know, head of the Sex Crimes Unit myself where, you know, I had young boys who were sodomized, in fact, one who killed himself, you know, after the sentence of the abuser. I mean, some horrible experiences. So for me to be so outraged. I mean this was really very, very bad what was going on there. It was like someone's worst nightmare. Who would even think of, of doing these things? And to do them in a group and with so many witnesses.

HOWARD FRIEDMAN:

The scenario as posted by the media and the police was so incredibly way out it was hard for me to believe that it was true.

LARRY KING:

("Larry King Live" footage)

We now welcome, also in Los Angeles, Debbie Nathan. Debbie is an investigative freelance journalist who has been covering the McMartin and other abuse trials around the country. All these parents are bizarro, huh? They're all whacked?

DEBBIE NATHAN:

("Larry King Live" footage)

Well, it's not really fair, I don't think, to deal simply with these parents or with this particular case. You have to understand that all over the country there is a hysteria. And I don't think that it's a question with most of these kids of lying. I think that they have been brainwashed if you will.

DEBBIE NATHAN:

I was one of the first writers for the mass media to look at those cases critically and question them. So as a result of that, having done a lot of that work, I got a lot of letters from people.

DAVID:

And my father wrote to Debbie and said, I don't know, said, "Help me." And she has been the only person outside the family that said, "I believe you."

DEBBIE NATHAN:

In the Friedman case, the basic charges were completely implausible. First of all, you'd have

to believe that blood is coming out of these children's orifices. That they're screaming. That they're crying. That their clothes are soiled from semen and from blood. And yet their parents show up. Sometimes they show up unannounced. Everything looks fine.

ANDREW (OC):

Was there any physical evidence in the case that was relevant? Or it was really, was the case really strictly based on the statements of the kids?

JOSEPH ONORATO:

It was more testimony. It was, there was a dearth of physical evidence. I, I don't even recall whether there was any physical evidence that would have indicated one way or another that these events took place.

DEBBIE NATHAN:

I don't think that they're sitting around with any kind of diabolical or conspiratorial agenda to go out and falsely accuse Arnold Friedman or railroad Jesse Friedman. But nobody's critiquing

them. Nobody's telling them that there's a right way and a wrong way to do this. Nobody's saying that we've got a problem in this culture with hysteria around this issue. And so they're really free to let their fantasies fly.

FRAN GALASSO:

I think the most overwhelming thing was the enormous amount of child pornography. You would just have to walk into the living room and it'd be piled around the piano. There were literally foot-high stacks of pornography in, in plain view, all around the house.

DEBBIE NATHAN:

But photos taken during the search showed nothing of the kind.

JOSEPH ONORATO:

But as far as the families were concerned, I don't want to use the word that they were competitive with each other. I don't know if it's to that extent. You know, sometimes it'd be some idle conversation about, you know, another boy, you know, "He was sodomized five times, but

...my son was sodomized six times," you know, as if that meant something in the overall scheme of things.

DEBBIE NATHAN:

There's a whole community atmosphere that gets created in a mass-abuse case like this, where the families are talking to each other, they're going to community meetings, or they're calling on the phone all the time. They're seeing each other in group therapy. And there is definitely an element when a community defines itself as a victimized community that if you're not victimized, you don't fit into that community.

FATHER OF COMPUTER STUDENT:

The families that had their child molested or allegedly molested became very involved and it took a greater part of their life at that point. I appreciated their call in the beginning telling me what happened. And then when I told them that we'd looked into it and my wife and I both felt that nothing happened to our son. It got to be a little pushy situation where they told us that we

were in denial and it absolutely happened to our son.

(MUSIC)

MALE VOICE ON PHONE:

(BEEP) You fucking bitch. I'm gonna kill you. When Jesse gets out of jail, he's a dead motherfucker. When Arnold gets out of jail, he's a dead motherfucker. Fuck you! And fuck your whole family! (HANGS UP)

ANDREW (OC):

Is there any one word or phrase that you could use to describe the experience overall?

ELAINE:

Chaos. Hysteria. It was really crazy.

HOWARD FRIEDMAN:

Am I dreaming? Is this a nightmare? The, this can't be happening to my family. My brother? And a day doesn't go by that I don't think of it. It destroyed my family. It tore us apart.

ELAINE:

I don't know. I, I can't say too much about it. They, they were ... We were a family.

(MUSIC)

INTERCARD:

After spending 6 weeks in jail, Arnold is allowed home under house arrest to prepare for his trial.

DAVID:

(home video footage)

Mommy believes you did it. And she believes you should go to jail. And she believes that she deserves everything that's left and you shouldn't have any part of it. You have to hire another lawyer!? All this woman does is hire lawyers. I honestly have to tell you, anything that she decides, I can't trust. She, she runs around, "Arnie, they don't trust me." Well, we don't trust her. We lived with her for three, for two months while you were in jail, and we learned not to trust her.

DEBBIE NATHAN:

David had just gotten a video camera when this case broke. And so he just started recording the family falling apart.

JESSE:

(home video footage)

People are telling me, "Look what your father did to you. Look at the mess he got you into." And Mommy believes him, and I don't. I tell them to get lost. And Mommy says, "You're right." And "I've lived with him for all my life. And look at all these horrible things he's done for me over 30 years." Which amounts to nothing -- except this.

JESSE:

At some point David making the videotapes kind of springboarded to my thoughts about audiotape. And I began to make audio recordings of these family arguments.

ELAINE:

(on audiotape)

He's my husband! He doesn't belong to you!

JESSE:

(on audiotape)

He's my father. He doesn't belong to you.

ELAINE:

(on audiotape)

Well, he doesn't belong to anybody now.

JESSE:

(on audiotape)

Why don't you tell me why you're being so pessimistic and why you're not standing behind the family and why you don't believe us?

ELAINE:

(on audiotape)

I don't believe your father because your father has never been honest with me. And I don't know where the truth is at this point.

SETH:

(on audiotape)

You're so fucking stupid!

GRANDMA:

(on audiotape)

Don't scream.

(OVERTALK)

SETH:

(on audiotape)

I don't want to talk about this!  
Why are we talking about this?

FEMALE VOICE:

(on audiotape)

We're trying to--

(OVERTALK)

SETH:

(on audiotape)

She's stupid! Don't listen to her!

ELAINE:

The family was screaming at each other. And everybody wanted me to say, "He didn't do it." Well, I wouldn't do that. I said, "I don't know." And I didn't, they wanted me just to lie, you know, and say, "He didn't do it," whether I believed it or not. And I was so angry at Arnold and what he'd done that I wouldn't do it. And I said, "Well, I don't know." And I wanted just to tell the truth. That is the truth. I didn't know.

DAVID:

My mother abandoned him, pretty much. Wouldn't talk to him, fought with him constantly, made him sleep on the sofa. And after 33 years of marriage when your wife, when you've been accused of a crime you didn't commit, you spend six weeks in pri-- in jail for it, you're trying to build a defense, and your wife leaves you, essentially, my father fell apart.

DAVID:

(home video footage)

You yelled and screamed about what, that you ruined her life. She's brainwashed you. You didn't do anything. The police have done it to you. It's not your fault. The police are do, are, are railroading you.

ARNOLD:

(home video footage)

That we know.

DAVID:

(home video footage)

But it's not your fault.

JESSE:

(home video footage)

Mommy doesn't believe you.

DAVID:

(home video footage)

The police pick-- picked on you, and that's who they're going after. It's not because you deserved it.

ARNOLD:

(home video footage)

I'm taking the blame.

DAVID:

(home video footage)

You're taking the blame, and you don't deserve the blame. She's brainwashing you into thinking that it's your fault. And it's not your fault. She thinks he did it. And if he did it, then she thinks he's going to be convicted of it. And if he's convicted of it, he's gonna go away.

JESSE:

(home video footage)

Yeah, but if, let's say he goes away for 10

years.

DAVID:

(home video footage)

And even if she--

JESSE:

(home video footage)

He's still gonna come out.

DAVID:

(home video footage)

No. I'm talking about 50 years. I'm talking about 100 years.

JESSE:

(home video footage)

She doesn't think he's getting 50 years. I don't think she thinks that he's gonna get 50 years.

DAVID:

(home video footage)

Okay. So what is he gonna get? Twenty years?

That's, that's 50 years.

JESSE:

(home video footage)

What's the difference, well--

DAVID:

(home video footage)

If he goes to a state institution on state charges you know he's not coming back.

JOSEPH ONORATO:

In this case, there was consultations between both sides -- the District Attorney's Office, the families, the defense attorneys -- as to what to do with Arnold Friedman.

JESSE:

We were trying to maintain a sense of normalcy in terms of having dinner and paying the bills, but it was almost surreal. I mean just, I don't think any of us had any notion of what was going on, or what we were doing, or where any of this was leading.

JESSE:

(home video footage)

Sir, sir would you like to comment on the

situation?

ARNOLD:

(home video footage)

Yes, I, I think this is a kitchen.

DAVID:

I thought it was only gonna last a year and that we would look back and laugh about how crazy we were and how we didn't know what we were doing. And just sort of laugh.

ARNOLD:

(home video footage)

What do you want my nose, my teeth?

DAVID:

(home video footage)

Wait a minute, there it is-- there's your nose.

ARNOLD:

(home video footage)

Oh that's great. (CHUCKLE) I feel like I'm being dissected here.

DAVID:

(home video footage)

And here's Mommy and Daddy in a rare moment of affection.

ARNOLD:

What's the matter?

ELAINE:

(home video footage)

I should have affection for you...why? Why?

ARNOLD:

(home video footage)

Why? Why not?

ELAINE:

(home video footage)

*Tsuris* is all I ever got from you.

ARNOLD:

(home video footage)

That's not all. You've gotten other things.

ELAINE:

(home video footage)

Lately.

ARNOLD:

(home video footage)

Lately but not-- but not all.

(MUSIC)

SONG LYRICS

*You're the one who's stolen my heart...*

ELAINE:

I think I was the first woman that he ever really dated. And he was very reluctant to get married.

I sort of said, "We've got to do this," you know.

I could be very... So he says, "Well, alright."

Big mistake (LAUGHTER).

HOWARD FRIEDMAN:

We were delighted. She was effervescent, pretty.

They seemed to be very much in love. They seemed

to be very compatible. It had been a long time in coming. My mother (CHUCKLE) "You're my oldest, get married, I want a grandchild," you know.

DAVID:

My mother is sexually ignorant. As far as I'm concerned she had sex, I mean everyone thinks their parents only had sex three times, you know for each of their, each of the siblings. But with my mother I think it was true.

ELAINE:

And it was like, you know you read in a book how do you have sex. And you start here and then you do step one, step two, step three. And that's somewhat like what sex was like with Arnold. Because I used to say to him, "It's called fore-play. It's supposed to be play, it's supposed to be fun." And he treated it like work. Like this is what you're supposed to do when you do it,

like washing the dishes.

DAVID:

If he was so much in the closet and not living with her and not attracted, where was she for 30 years? Why didn't she say, "Honey, you're not having sex with me. I think I want a divorce." Where was she? I don't think that's the case. Something, either she's, either they're both crazy -- which is a possibility. Or, or he was perfectly normal based, according to, you know, by her standards.

(MUSIC ENDS)

LYRICS

*You're the one for me.*

HOWARD FRIEDMAN:

It was a difficult marriage because of Elaine. She had her problems, and it took a monumental amount of patience and love and caring to handle it. It wasn't easy for him. It wasn't easy for

the kids. But they were able to live with it. She was the best mother she knew how. She loved her kids and she loved her husband. She wasn't the warmest, most outgoing human being in the world.

ELAINE:

When I had the first child, I was just ecstatic. But I didn't know how to do it. And I wasn't the most well balanced person myself. You know, we all have hang-ups and...That's my hang-up: Good things can never happen to me, only bad.

ARNOLD:

(home video footage)

That's all, that's all the snapshots.

DAVID:

(home video footage)

I know.

ARNOLD:

(home video footage)

This whole thing is all the snapshots.

DAVID:

(home video footage)

I know. Did they go, and they looked through  
each one?

ARNOLD:

(home video footage)

They must have. This is, this is ancient film.

JESSE:

(home video footage)

What is it Dad?

DAVID:

(home video footage)

Holy shit.

JESSE:

(home video footage)

Dad, what is it?

DAVID:

(home video footage)

Oh my god, it's amazing. How did you get this?

This is great.

ARNOLD:

(home video footage)

This is my Dad's--

DAVID:

(home video footage)

Who took it?

ARNOLD:

(home video footage)

--my-- father.

JESSE:

(home video footage)

Dad, what's that a film of?

ARNOLD:

(home video footage)

This is a film of my sister.

(MUSIC)

HOWARD FRIEDMAN:

I had a sister. She died a year before I was born. My brother knew her when he was young, of course. And she died of blood poisoning. It was a horrible, terrible, sudden death.

ELAINE:

And it destroyed the family. Arnold's parents divorced. So Arnold's mother had these two boys and they were really on welfare, I don't know, it was, they lived in a basement apartment.

Evidently, there was one bedroom and the boys slept in the bedroom with the mother.

HOWARD FRIEDMAN:

We shared, all three of us, not in the same bed, but we all shared the same room, big rooms. And

rather than put a, apparently they, the living room was the living room and then there was the kitchen. So we put all the beds in the one room.

ELAINE:

And that she dated a lot of men and would bring the man, men into the apartment and they would have sex in the bed while Arnold was there listening. And Arnold said that because he saw his mother in bed with a man, that when he was adolescent he was experimenting -- as all children do -- and he had sex with his brother in bed or something like that. And to me, that's not what all children do.

DEBBIE NATHAN:

Arnold sent me this right around when he started writing me and it's called "My Story" and it was written in 1988. And I think it was his attempt to talk about the case, but also talk about the

case in the context of his life.

And it starts out, it says, "This story goes back 50 years to when I was a child." He says, "When I reached adolescence I sought out partners for my emerging sexuality. My first partner, when I was 13 was my eight-year-old brother. I had overt sexual relations with him over a period of a few years."

HOWARD FRIEDMAN:

I know that my brother has said that he messed around with me when I was a kid. And I don't remember any of it. I don't remember anything. I have nothing up here that has me yelling, or screaming or crying, or trying to get away, or unhappy or...I, there's nothing there that, maybe someday a door will open, but it better hurry up, because I'm 65 (CHUCKLE). And at this point in

time, I could care less.

DEBBIE NATHAN:

Then he goes on and says, "My next partners were boys my own age all of which sexual relations probably being within norms for my age. However, the emotional impact of these relations was very pronounced, and lasted through my adult life. A more normal situation, as probably happened with my partners, would have been to outgrow and forget these episodes. However, I literally fell in love with these boys. And the relations were far more significant to me than they were to my partners."

And then he told me that when he got to be an older teenager, like maybe in his late teens, he started worrying that he was still attracted to kids that were the same age as his brother had been when Arnold was 13. And that really started

bothering him. And then after he had his own children he was worried. He started worrying that maybe he would molest his own children.

And at that point he went to therapy. And the therapist told him, "No, don't worry. You've got everything under control."

SONG LYRICS

*The Jazzbo Mambo with the boogie beat is the newest dance on 52<sup>nd</sup> Street. All the cats come running from both near and far to do the Jazzbo Mambo eight to the bar.*

JESSE(OC)

Come on, Light Fingers... Light Fingers, come on.

SONG LYRICS

*Jazzbo Mambo! Jazzbo Mambo! Jazzbo Mambo, eight to the bar.*

FRAN GALASSO:

You could see that this wasn't exactly Fred McMurray and "My Three Sons" right? It was, it struck us as being a very dysfunctional family, obviously. And would have to, you would have to wonder -- wouldn't you -- what kind of a family situation you would have that could produce this kind of crime. What might it be like to grow up in a household like this? I don't know. I can't even imagine.

DAVID:

(home movie footage)

Today is September 14, 1975. We just concluded a tour of Jungle Safari.

SETH:

(home movie footage)

Jungle Habitat.

DAVID:

(home movie footage)

Jungle Habitat in West Milford, New Jersey. Here

are my three brothers.

SETH:

(home movie footage)

Two brothers, you dummy.

DAVID:

(home movie footage)

Two brothers. Alright, there are three children.

ELAINE:

What happened was the three sons were like a gang. Like "This is our gang. And Mom, Mom, she's not, she's not part of our gang."

DAVID:

(home video footage)

And we have of course, (CHUCKLE)

JESSE:

A pterodactyl.

DAVID:

A Pteradactyl.

ARNOLD:

(home movie footage)

A Jewish pterodactyl. Shmuck, shmuck, schmuck.

DAVID:

The four of us got along so well. We had a very similar kind of sense of humor. You know one guy would say something and then it would, then the next person would add to the joke. And my mother who has no sense of humor, and she just didn't get that part of us. And she resented that.

ELAINE:

When this whole thing blew apart, the men got together and Arnold confided in them. And me? And I was a loyal wife. People told me, "Oh why don't you leave him, he's a horrible person. Just walk out and leave him." And I didn't. I went all over town. I raised money for bail. I called every relative I knew. I begged. And I did all this for him, right. He was my husband,

I loved him. And no one said, "What do you want?" to me.

SCREEN ID: PASSOVER SEDER, 1988

JESSE:

(home video footage)

Toast to Daddy being here next year. Ma, your toast.

DAVID:

(home video footage)

Or even next month.

ELAINE:

(home video footage)

That's my toast. That we have a seder next year.

DAVID:

Okay.

JESSE:

(home video footage)

Okay, I think we can eat now.

DAVID:

(home video footage)

So you're saying, so what we have is the people who we thought would testify and say that nothing happened--

GRANDMA:

(home video footage)

The lawyer calls up on a Sunday?

DAVID:

(home video footage)

--that something happened. And we are afraid to put them on the witness stand, even though we know that nothing happened. We think they will say something happened.

JERRY BERNSTEIN:

The Friedmans suggested that we speak to various

people who may have been present at the time.

And some of those people weren't alleged victims at all. And that the hope was that one or more of these people would say, "This is just not true." But that just didn't happen.

DAVID:

(home video footage)

They're not getting favorable and you're getting negative. The kids who, he said this one kid who wasn't, he wasn't pressing charges, he wasn't approached by the police or maybe he was, but he didn't join up with the police. And he's claiming that something happened.

As far as I'm concerned he's being, he's, clearly he's lying because nothing happened. Did something happen, Dad?

ARNOLD:

(home video footage)

No.

DAVID:

(home video footage)

So then nothing happened.

DAVID:

We begged him to tell us that something happened to explain how this whole mess could have happened. That's the only way to explain how it could have happened, other than the fact that the police are out of their minds. He, we begged him, he told us nothing happened. That's good enough for me -- nothing happened.

JESSE:

If my father had the ability to confess to me, yeah he had done something one time, and that's how this whole crazy mess got started, it would

make a lot more sense. Not that I wanted that to be the case. But you have to find a way to explain the unexplainable.

DAVID:

(home video footage)

Oh, my gosh.

GRANDMA:

(home video footage)

Oh, look at that.

GROUP: (singing)

(home video footage)

"Happy Birthday to you. Happy Birthday to you."

GRANDMA:

(home video footage)

Is that a real ice cream?

ELAINE:

That's what's so odd about it. They had this idealized image of this father as being this

saint-like person, this Santa Claus, Messiah, you know. And professionals in the field say that, oh they have this idea that children identify with the abusive parent.

When I was about a year or two, my parents separated. And what did I do? "My father is wonderful. My mother is terrible." The truth is -- my father was a rat, just like David's father. My father walked out. This is not wonderful. This is being a rat. My mother was, my mother was a nag. Well, I mean this is true. But look, she stayed with me, she took care of me. So people's visions are distorted.

DAVID:

I never felt angry at my dad. My dad had nothing to do with this. Someone knocks on the door and accuses you for a crime you didn't commit, you gotta, you gotta attack, attack your attackers

and do what you can. And that's all it was. It had nothing to do with... There was nothing else that was involved at all.

ELAINE:

(home video footage)

We were talked about honoring and respecting.

DAVID:

(home video footage)

But yeah, talk about honor and r--, do you honor and respect your husband? That's why I don't talk to you.

ELAINE:

(home video footage)

I said I did honor and respect my husband.

DAVID:

(home video footage)

Oh, okay.

ELAINE:

(home video footage)

But you don't like that answer.

DAVID:

(home video footage)

No I don't, I don't believe it, no.

ARNOLD:

Things are getting a little out of hand.

ELAINE:

(home video footage)

Ask your father. Do I honor and respect you?

ARNOLD:

(home video footage)

Yes, you do. Things are deteriorating here.

ELAINE:

(home video footage)

Do you object to my handling, do you have any objection in my relationship with you?

ARNOLD:

(home video footage)

No.

DAVID:

(home video footage)

Do you like it when she calls you slime?

ARNOLD:

(home video footage)

She doesn't call me slime everyday.

DAVID:

(home video footage)

She did. Did you like it when she did?

ARNOLD:

(home video footage)

No, not that one time.

DAVID:

Okay.

ARNOLD:

That was the only time.

DAVID:

(home video footage)

Did you like, do you like it--

DEBBIE NATHAN:

The other cases that I've written about -- those families have been much stronger. They've, first of all they've started from a monolithic feeling of innocence, which didn't exist in this family, because of Arnold's pedophilia. And they just buckled down and everybody gets behind the defendant, the accused family member. People quit their jobs. And you know people were all sitting around the kitchen table for the next three years with staplers and Xerox machines. And they're working on the defense. And then when the defendant is convicted, they're working on the appeal. And all family conflict is

submerged.

ELAINE:

(home video footage)

Why don't you try once to be supportive of me.

DAVID:

(home video footage)

Well, I'll tell you why. Because we all started at the beginning of this thing and, and--

ELAINE:

(home video footage)

Well let's start from right now.

DAVID:

(home video footage)

Okay, let's start from right now.

ELAINE:

(home video footage)

Right now.

DAVID:

(home video footage)

Alright, let's start from right now. We'll start brand new. We're all starting brand new.

We have a decision making process on the table.

SETH:

(home video footage)

Great.

DAVID:

(home video footage)

All the past mistakes, they were mistakes. We're not gonna hold them against anyone.

SETH:

(home video footage)

Great, great. Now we're starting afresh.

ELAINE:

(home video footage)

All I ask is that --

SETH:

(home video footage)

Stop, lower your voice, and talk nicely to your  
sons.

ELAINE:

(home video footage)

-- I wanted you guys to call me.

DAVID:

(home video footage)

Alright, we're gonna do it, starting now.

GRANDMA:

(home video footage)

Seth, why don't you call me?

(OVERTALK)

(MUSIC)

JERRY BERNSTEIN:

I think there was a recognition that Arnold's  
case was becoming increasingly hopeless because

of the child pornography problem, because of other people coming out of the woodwork. So the strategy evolved to, "What can we do to save Jesse?"

ELAINE:

Jesse's lawyer very eloquently said to us, "If there's a rowboat and it's sinking, and the rowboat is tied to a rock, you have to disconnect the rowboat from the rock and save the rowboat even though the rock is sinking." Meaning you had to separate Arnold from Jesse. And Arnold was going to plead, and Jesse would in some way benefit.

JESSE:

I was sitting there potentially going to trial with no pornographic magazines admitted into evidence. Without an adult pedophile as a co-defendant. And I understood that sort of reasoning. But it makes no sense if my father

pleads guilty and then I go to trial and say, "I didn't do it," when all the jurors have already read in the newspaper that my father plead guilty.

And I did not want my father to plead guilty.

SCOTT BANKS:

I arranged for Mr. Friedman and his family to get a jury room where they could sit and they could discuss these plea options. And while I didn't go inside the room except to knock on the door and say where we're at in terms of what Mr. Friedman wanted to do, there was a lot of yelling and crying, and screaming going on, coming out of that room.

ELAINE:

When I screamed at Arnold I screamed, "You must do it because it'll help Jesse. Do it for Jesse."

JESSE:

And my brothers were just furious at this notion that my father would go to court and plead guilty. And at one point in all of the chaos my father just started screaming. And there's uncontrollable tears. He picked up a chair, I remember he threw a chair. He was just screaming about how he wasn't gonna plead guilty, he didn't do anything, he's not gonna plead guilty. And he was furious at my mother, and he was, he was just freaking out.

And I remember very clearly sitting down with my father in the corner. My mother's over there, my brothers are over here. I'm talking to my father privately and he asked me what he should do. And I could have said to my father, "I want you just to walk out of here and go to trial and not plead guilty." Instead, I remember very clearly saying to him I wanted him to make the decision. And I

remember feeling like a really young kid. Kind of looking up to my Dad and saying, "Dad, I, you know, I want you to be my Daddy."

And I would have been really, really proud of him if he just stood up and said, "Elaine, I'm not pleading guilty. We're going to trial." But that's not what happened.

MALE REPORTER:

Former New York City schoolteacher Arnold Friedman had nothing to say when he left the Nassau County Courthouse in Mineola. But inside he pleaded guilty to more than 40 counts of sodomy, sexual abuse and endangering the welfare of a child.

COURT CLERK:

(news footage)

Attempted sexual abuse in the first degree, an "E" felony, two counts. And endangering the

welfare of a child, a Class "A" misdemeanor, one count, in full satisfaction of this indictment?

ARNOLD:

(news footage)

Yes.

DAVID:

My mother manipulated him. My mother is crazy, and my mother has control over my father. Some relationships have that, where the woman controls the man. It's called being pussy whipped. My father and my mother are not the only two people in the world who have that relationship. My father and mother had that relationship. My mother and the lawyers said, "Take the plea." They took the plea.

HOWARD FRIEDMAN:

I sat there in disbelief. Is this my brother? My brother? This isn't my brother, he's not a monster. He's a good loving brother, and husband,

and son, and citizen, and teacher. And this isn't happening. This is a mistake. Something as horrendous as child molestation, you have to live with yourself. If you didn't do it, you don't plead guilty. I never understood it.

INTERCARD:

It's the night before Arnold is to begin serving his sentence.

(MUSIC)

JESSE:

(home video footage)

We have Elaine.

ELAINE:

Hi.

JESSE:

We have Teddy, Arnie.

ARNOLD:

(home video footage)

Number 4753206.

ELAINE:

(home video footage)

Don't. Please don't film me. I, David, I told  
you I don't want to be on tape.

JESSE:

(home video footage)

Why are you so ...

DAVID:

(home video footage)

She wants no, when we stop talking to her--

JESSE:

(home video footage)

She doesn't want--

(OVERTALK)

DAVID:

(home video footage)

She doesn't want any record, any record at all.

ELAINE:

(home video footage)

Can you believe these kids? That they have to  
persecute me?

ARNOLD:

(home video footage)

David, if your mother doesn't want to be filmed,  
don't film her.

DAVID:

(home video footage)

Okay.

ARNOLD:

(home video footage)

Come on.

ELAINE:

When it was all over they said it was all my fault because I wanted them to do... to take a plea and ... It had been arranged before. Arnold wanted, agreed to take a plea. But they were very hurt.

ARNOLD:

(home video footage)

I'm still here. (CHUCKLE) I may not be here very much longer, but I'm still here.

DAVID:

(home video footage)

That's disturbed.

ARNOLD:

(home video footage)

Yeah.

MALE REPORTER:

The sentence: 10 to 30 years. The crime:

sodomizing young boys. Defendant Arnold Friedman had pleaded guilty to sexually abusing more than a dozen youngsters. But this does not end the Friedman case. There are still numerous sodomy and sex abuse charges pending against Arnold's son, Jesse Friedman.

JESSE:

(home video footage)

You know, without Daddy in this case I can't see any reason why we shouldn't go to the media with this. I mean we could try this case in the media. Who's gonna, who's gonna buy that I sodomized boys?

DAVID:

(home video footage)

Yeah, I agree with you, I agree with you.

JESSE:

(home video footage)

No, I really--

DAVID:

(home video footage)

Well, I don't think we have to. Well all I want to do, I think we can certainly, we can go to trial and prove it in the trial.

JOSEPH ONORATO:

We didn't make a deal with Arnold Friedman to spare his son. So his son is facing a multiple count indictment, he's facing a considerable amount of jail time. And now he's confronted with a situation where Long Island knows that his father admitted his guilt. And there's a reasonable human expectation of some people that, you know, where there's smoke there's fire. And if he did it, maybe his son did it. He was, we know he was in the same class and he was helping his father. So I think that was a difficult

thing for Jesse to have to overcome.

(MUSIC)

PETER PANARO:

I always believed Jesse. How could this possibly go on for four years? Children repeatedly sodomized and sexually abused, with brutality if you believe the police. And then their parents come to pick them up right after computer class and not one kid is crying. Not one kid tells his mother or father what happened in class. Not one kid says anything? I find that so incredible that Jesse's story that nothing happened -- to me -- was more believable than the police version of these horrific acts.

Jesse and I went, we flew in August of 1988 all the way to Madison, Wisconsin where we rented a car and drove 90 miles to some town that I couldn't possibly give you the name of, to a

federal prison. Who knew more about this case than Arnold Friedman? He knew more about it than Jesse. I had to wait 40 minutes because Arnie was either playing tennis or golf, I don't remember what it was. I was outraged.

It was a visiting room. Jesse was out in the waiting room at this point. And this man had this little boy in there who was his son or his stepson, I don't know. But the child was about four or five years old. And they were in the table right next to us. And I was interviewing Arnie, and all of a sudden he leaned over and asked me if I could ask the corrections officer - - or whoever was in charge in the room -- if we could get another table. And I asked him why, and he said, "That little boy over there bouncing on his father's lap is getting me very excited."

It took me about 15 minutes to regain my composure. I remember that like it was yesterday. I was shocked. 'Cause even though I was involved in the case now for two months, and even though I had studied pedophilia and I knew what these men did to little boys, I had never heard somebody actually say it. And I was absolutely disgusted.

We did change our table and I spoke to Arnie. I interviewed him for a very long time. He was telling me that the only reason he pled guilty and went to jail was because he wanted to save his son, Jesse. He told me that he had, that he was a pedophile. He told me that he had had activity with boys. But not in Great Neck.

He told me that he had a house in Wading River, a beach resort. And that the family enjoyed

vacations there. And he told me that there were certain boys he took liberties with, and I don't want to go into it, while he was in that area.

DEBBIE NATHAN:

(reading)

"In my early '40s, during the summer, I did go quote, 'over the line,' and did have sexually arousing contact with two boys, short of sodomy. One of the boys was the son of a close friend and I feared exposure and loss of this friendship. The boy might have told his parents but they said nothing. So I assumed that he really had not told them."

DAVID:

That's what? It's one sentence, what does that mean? What, do you fucking know what that sentence means? I don't even fucking know what that sentence means. I "sexually aroused?" What the fuck is he talking about? Maybe he put his

arm around the kid. Maybe he was, took him in a sailboat. And he found that sexually arousing. Maybe he was leaning against a tree. That's called sexually arousing contact, if you're sexually aroused while you lean against a tree. I don't know what that means. I don't know what that sentence means.

ELAINE:

When Arnold was first arrested, he said, "I'm arrested because of this magazine. I sent one magazine in the mail and that's why I'm arrested, and it's nothing. It's just nothing, it doesn't count, it doesn't matter, it's nothing." And you know, you, you live as husband and wife, you share certain intimacies. I said to him, "Tell me the truth. What happened?" He says, "That's it. That's the truth."

So it came out that he had, in fact, molested a

young man. And we were sitting in the therapist's office. And he said, "Oh, I just molested two boys." And I said, "Two? Two?" I said, "I thought you told me only one." "Well, you know" and he "it didn't matter, and it's nothing," you know. And then I went berserk. And I felt betrayed.

JESSE:

Yeah, so my father had the magazines. And yes, my father admitted that he was a pedophile and had these fantasies. And yes, my father admitted that he was no saint. And that there were times that he slipped. But I was arrested, too. And I'm not a child molester. And I don't think it's appropriate for me to have to answer for the sins of my father.

(MUSIC)

DAVID:

This is what I walk around with. It's just,

every day. It's just ridiculous. All I think about is the case and my career. And they're completely -- it's like oil and water. With the case it's a question of research. My brother's been in the law library researching his current plan. And I'm supposed to go out and make people laugh. It's unbelievably difficult to deal with the case and then go out and entertain people.

DAVID (as a clown):

Hey! Hi, everyone!

PETER PANARO:

We carefully investigated this case for trial. Really get into the case, examine, investigate. And try to build a defense.

JESSE:

While I was out on bail, I put all the charges into a database. So that they could be sorted by complainant, by time period, by nature of charge.

For example, there was one complainant, ten-year-old boy. Says he came to class in the spring of 1986. And during this ten-week session where he was only over my house for an hour and a half once a week, he says that there were 31 instances of sexual contact. That's three times a week, every single week, for ten straight weeks. And then the course ends. In the fall, he re-enrolled for the advanced course and says that he was subjected to 41 more instances of anal and oral sodomy in the next ten-week session. And nobody said anything. Week after week, month after month, year after year. Until after the police came knocking on doors and asking questions.

FATHER OF COMPUTER STUDENT:

I went to the doorbell. There were two Nassau County detectives and they said they'd like to speak to our son with regard to the Friedman

matter. They came in and said "We know something happened to him." They didn't say "We believe." They said, "We know." And they wanted to speak to him.

RON GEORGALIS:

Yeah, I remember it was actually kind of a frightening experience because I remember they're talking to my parents about this. Within earshot of me. I remember actually eavesdropping on what they said. And what they said made my heart race. Because they were saying that actually quite a few horrible things had happened to a lot of children. And I was one of them.

And quite honestly, I didn't believe it, and I was very confused and very angry about this. Thinking, well, why are these people going around telling my parents that all kinds of things have happened when I have simply no recollection of

anything.

LLYOD DOPPMAN:

Children want to please very often. They want to give you the answers that you want. Adults do that as well. So you have to be very mindful of the fact that when you're interviewing a child, if the child starts to answer questions, your responses should be somewhat in the framework of, "And then what happened?" Or, "What happened next?" Or, "What do you remember then?" As opposed to, "He did this to you, didn't he?" Or "She did this to you, didn't she?" That's a very, very dangerous type of interview process to use.

ANTHONY SGUEGLIA:

If you talk to a lot of children, you don't give them an option, really. You just, you be pretty honest with them. You have to tell them pretty

honestly that "We know you went to Mr. Friedman's class. We know how many times you've been to the class." We, we, you know, we go through the whole routine. "We know that there was a good chance that he touched you or Jesse touched you or somebody in that family touched you in a very inappropriate way."

FATHER OF COMPUTER STUDENT:

And I listened to them talking to him and it got to a point where it wasn't asking him what happened. It was more of them telling him what happened. And that when they didn't like what he said, they kept repeating to him that they know what happened. And that he should tell.

FORMER COMPUTER STUDENT #3:

I believe that I remember saying that I saw Jesse like chase after a kid or hit a kid or something like that. And that's what I testified to, to the grand jury. And I remember saying that

because I felt, and I feel like when I said that, that ended the questioning. And so that might have meant that, you could infer maybe that they were asking me a lot of questions. Trying to get something. And I just wanted to give them something. I mean I don't want to be, say I'm a perjurer or anything. But I did not observe anything like that happening.

FORMER COMPUTER STUDENT #4:

(on telephone)

What I do remember is the detectives putting me under a lot of pressure to speak up. And at some point, I, I kind of broke down. I started crying. And when I started to tell them things, I was telling myself that it's not true. I was telling myself "just say this to them in order to get them off your back."

TEXT:

This student's testimony led to 16 counts of sodomy.

DEBBIE NATHAN:

I came across a document regarding a group of children from the Friedman case who were in therapy. And it stated that many of them had absolutely no recollection of the abuse. And there was some discussion about whether hypnosis would be a good idea now. Exactly what you're not supposed to do. It was the kind of therapy that had a really good chance of messing up kids' memories and implanting false memories.

FORMER COMPUTER STUDENT #1:

My parents put me in therapy right away. They put me in hypnosis and tried to recall facts that I had buried. And that's how I first came out, started talking about it. Just through, being hypnotized and everything. I recalled things

that I would bury. I was able to talk about them.

ANDREW (OC):

For example, what would be something that you recall?

FORMER COMPUTER STUDENT #1:

The actual first time I actually recalled that I was actually molested. Wow, I was actually molested, I can deal with it now. That was the first time.

ANDREW (OC):

And you recalled through hypnosis the first episode?

FORMER COMPUTER STUDENT #1:

Yes.

ANDREW (OC):

So tell me about that, if you remember.

FORMER COMPUTER STUDENT #1:

I don't remember much about it. It was just, it

was so long ago. I just remember that I went through hypnosis, came out, and it was in my mind.

TEXT:

This student's testimony led to 35 counts of sodomy.

MALE REPORTER:

(news footage)

19-year-old Jesse Friedman was arraigned on more than 198 additional counts of child sexual abuse. This brings the total number of sexual abuse charges to 245.

DEBBIE NATHAN:

Jesse was grossly overcharged. And you're basically terrorizing the defendant. You're telling the defendant "Look, if you plead guilty, you know, we'll give you a good deal. And, on

you know, two charges. But if you insist on going to trial, we're going to put 1,003 charges on you. And if you're convicted of all those charges, you're gonna rot in jail the rest of your life."

ELAINE:

I was told that if he went to trial, the judge would give three consecutive sentences. Instead of concurrent, the sentencing would be consecutive. I said, "Oh, my God."

JESSE:

She just kept telling me over and over: "The only thing to do is to plead guilty and to get the best deal you can. You can't go to trial. It doesn't matter if you're guilty or innocent. You can't go to trial because if you go to trial, you're gonna go to prison for the rest of your life." I said, "But Ma, I didn't do it." She said, "That doesn't matter, you have to plead

guilty."

PETER PANARO:

You have to understand, this is a 19-year-old kid and he is now facing the most heinous charge known to man. And everyone in the world slowly but surely was turning against him.

DAVID:

(home video footage)

I don't care about my parents. I wish it was just my brothers. Oh, fuck. I don't care about my mother, that's for sure. If my brothers were okay, then my mother could go to fucking hell. My father is not going to survive if my brother gets incarcerated. So, so when the guilty verdict comes in on Jesse, my father's gonna kill himself. Jesse's gonna go to jail for the rest of his life. Seth is gonna move west. Fuck... fuck.

PETER PANARO:

I received a telephone call from Jesse asking to see me. And Jesse told me that he wanted to plead guilty.

JESSE:

In 1988, there was no way that a jury in Nassau county who had been reading the newspaper headlines in Newsday for over a year, those people were never going to listen to anything the defense had to say. And I was absolutely terrified of going to prison for 100 years.

PETER PANARO:

Jesse had always maintained his innocence. I don't work out deals for people who are innocent. And my first reaction was, "I'm not gonna do it. You're not guilty, you're not pleading guilty." And at that point, he told me that "I have something to tell you." And with tears rolling

down his eyes, literally, he told me that he was abused by his father growing up. And that while he never enjoyed the sexual part of that, he did enjoy the attention his father gave him and being with his father. And that not everything he had said about nothing happened was true.

JESSE:

Peter Panaro was personally convinced that my father had sexually abused me. And nothing I could say could dissuade Peter from this notion.

PETER PANARO:

Jesse felt that if Judge Boklan knew that he also was a victim of his father, that she might consider the plea negotiations in a more favorable way.

JESSE:

He came up with this strategy. It was Peter Panaro's fictionalized story that he fed to me. And said, "If you say this, it's gonna look good

for you."

PETER PANARO:

I told him, I wouldn't do it. I told him, "Jesse, when you plead guilty in open court, you're gonna have to admit to this type of anal sodomy, 14 times. And I'm not gonna let you do that unless you can admit it." He looked me right in the eye, always liked to call me by my name before he made a statement, and said, "Peter, I can admit it."

JESSE:

The only concern that Peter Panaro had was that ethically as a lawyer, he couldn't let his client go into court and say something happened that he knew his client had told him was a lie.

(MUSIC)

The private investigator wasn't coming up with anything helpful. There was not gonna be any defense witnesses. There wasn't any money to

hire experts. Mom was insistent upon there not being a trial. Peter Panaro wasn't believing me, no matter how many times I told him nothing happened. I just ran out of options.

ELAINE:

Jesse was a very good baby. I remember when we brought him home from the hospital and Arnie looked at that baby and he said, "That child is marvelous. He's wonderful." And he was so thrilled. And David was the big brother and he used to take care of Jesse. We used to let David watch him, and he was very protective of his baby brother.

DAVID:

(home video footage)

It's amazing. Six months from now ... I already don't have a father or a mother. Six months from now I'm not gonna have my brother. If I ever watch this, I don't know when it's gonna be. I

don't know where I'm gonna be. I don't know  
what's gonna happen to my family. I'm so scared.

INTERCARD:

It's the night before Jesse is to enter his  
guilty plea.

SETH:

(home video footage)

We're trying to help Jesse pack. His last night  
of freedom, and I wish you would help.

ELAINE:

(home video footage)

I don't want to have to spend the next eight  
hours screaming with my sons and fighting with  
them.

JESSE:

(home video footage)

Then shut up.

ELAINE:

(home video footage)

I want them out of this house tomorrow morning.

DAVID:

(home video footage)

Mom, we're here for Jesse.

ELAINE:

(home video footage)

I don't give a shit. I want you out of this house tomorrow--

DAVID:

(home video footage)

You may not give a shit about Jesse but we are here for Jesse.

JESSE:

(home video footage)

What are you talking about? What are you all

talking about here?

DAVID:

(home video footage)

Can't you put your anger aside for one minute?

ELAINE:

(home video footage)

I cannot put my anger aside about you. You have been nothing but hateful, hostile, and angry, ever since this began.

DAVID:

(home video footage)

Okay, Jess, we're on.

JESSE:

(home video footage)

Ta da. I feel like shit.

DAVID:

(home video footage)

What's today's date?

JESSE:

(home video footage)

Today's the day before I went to jail.

DAVID:

(home video footage)

"Went" to jail?

JESSE:

(home video footage)

I'm going to jail--

DAVID:

(home video footage)

Because we're watching it.

JESSE:

(home video footage)

Yeah, went. We're gonna be watching this after I'm already out of jail. After four, four-and-a-half years, because the case gets reopened.

At this point in time my life is as good as over. It is terminated at this point only to resume at a later day.

This one'll go, this one'll shatter.

DAVID:

The night before Jesse's plea we stayed up all night. Maybe I shot the videotape so that I wouldn't have to remember it myself. It's a possibility. Because I don't really remember it outside of the tape. Like when your parents take pictures of you, do you remember being there, or do you remember just the photograph hanging on the wall?

JESSE:

(home video footage)

Even if I'm facing the worst scenario possible tomorrow, and for every day following it, I have