COMMONWEALTH OF PENNSYLVANIA
COUNTY OF:LYCOMING

Magisterial District Number: 29-3-04
MDJ: Hon. William Solomon
Address: 1965 Lycoming Creek Road
Williamsport, Pennsylvania 17701

Telephone: (570)323-9982

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: *(NAME and ADDRESS):*

CHRISTINE *First Name* G *Middle Name* ZEIGLER *Last Name* Gen

2335 Northway Road Extended
Williamsport, PA 17701

NCIC Extradition Code Type

- ☒ 1-Felony Full
- ☐ 2-Felony Limited
- ☐ 3-Felony Surrounding States
- ☐ 4-Felony No Extradition
- ☐ 5-Felony Pending Extradition
- ☐ 6-Felony Pending Extradition Determ.
- ☐ A-Misdemeanor Full
- ☐ B-Misdemeanor Limited
- ☐ C-Misdemeanor Surrounding States
- ☐ D-Misdemeanor No Extradition
- ☐ E-Misdemeanor Pending Extradition
- ☐ F-Misdemeanor Pending Extradition
- ☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number	Request Lab Services?
CR. 150. 20	12/03/2020	U 938630.0	BCC200217	☒ YES ☐ NO

GENDER	DOB	POB	Add'l DOB	Co-Defendant(s) ☒
☐ Male ☒ Female	01/25/1970		/ /	

First Name	Middle Name	Last Name	Gen.
AKA			

RACE: ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY: ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

Hair Color: ☒ GRY (Gray) ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown) ☐ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Pink) ☐ BLN (Blonde / Strawberry)

Eye Color: ☐ BLK (Black) ☒ BLU (Blue) ☐ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray) ☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)

DNA	☐ YES ☒ NO	DNA Location	WEIGHT (lbs.)
FBI Number		MNU Number	
Defendant Fingerprinted	☐ YES ☒ NO		Ft. HEIGHT In.
Fingerprint Classification:			5 6

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. ☐	School Veh. ☐	Oth. NCIC Veh. Code	Reg. same as Def.
		☐					☐

VIN	Year	Make	Model	Style	Color

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

BERNARD ANDERSON
(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

12/03/2020
(Date)

I, SPECIAL AGENT BARTON SEELIG (Name of the Affiant) 601 (PSP/MPOETC -Assigned Affiant ID Number & Badge #

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
   ☐ I accuse the defendant whose name is unknown to me but who is described as _____

   DEC 03 2020

   ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe
   with violating the penal laws of the Commonwealth of Pennsylvania at [ ] (Subdivision Code) (Place-Political Subdivision)

in LYCOMING County [41] (County Code) on or about APPROXIMATELY 1994 TO 2020.

POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR.150.20	12/03/2020		BCC200217

Defendant Name:	First:	Middle:	Last:
	CHRISTINE	G	ZEIGLER

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

Inchoate Offense	☐ Attempt *18 901 A*	☐ Solicitation *18 902 A*	☐ Conspiracy *18 903*	Number of Victims Age 60 or Older 0

Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
☒	1	4304	(A)(1)	of the	TITLE 18	8	F3	3899	

PennDOT Data (if applicable)	Accident Number	_____	☐ Interstate	☐ Safety Zone	☐ Work Zone

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense: ENDANGERING THE WELFARE OF CHILDREN.
In that the defendant, Christine Zeigler, while acting in the capacity of a parent, guardian or other person supervising the welfare of a child under 18 years of age, or a person that employs or supervises such a person, did knowingly endanger the welfare of the child by violating a duty of care, protection or support.

Inchoate Offense	☐ Attempt *18 901 A*	☐ Solicitation *18 902 A*	☐ Conspiracy *18 903*	Number of Victims Age 60 or Older 0

Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
☐				of the					

PennDOT Data (if applicable)	Accident Number	_____	☐ Interstate	☐ Safety Zone	☐ Work Zone

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

Inchoate Offense	☐ Attempt *18 901 A*	☐ Solicitation *18 902 A*	☐ Conspiracy *18 903*	Number of Victims Age 60 or Older 0

Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
☐				of the					

PennDOT Data (if applicable)	Accident Number	_____	☐ Interstate	☐ Safety Zone	☐ Work Zone

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR. 150-20	12/03/2020		BCC200217

Defendant Name:	First:	Middle:	Last:
	CHRISTINE	G	ZEIGLER

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.

3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.

4. This complaint consists of the preceding page(s) numbered 1 through 2.

5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

DECEMBER 03 — (Date)

2020 — (Year)

(Signature of Affiant)

AND NOW, on this date 3 DECEMBER 2020 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

29-3-04
(Magisterial District Court Number)

(Issuing Authority)

Magisterial District 29-3-04
Commonwealth of Pennsylvania
Lycoming County
Magisterial District Judge

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-150-20	12/03/2020	U 9386030-0	BCC200217

Defendant Name:	First:	Middle:	Last:
	CHRISTINE	G	ZEIGLER

AFFIDAVIT of PROBABLE CAUSE

From July 06, 2011 to Present the co-defendants, MATTHEW ZEIGLER and CHRISTINE ZEIGLER, endangered the welfare of their eight (8) natural children by imposing excessive and abusive physical and emotional discipline. These allegations were investigated by the Old Lycoming Township Police Department, Lycoming County Children and Youth Services (LCCYS), Pennsylvania State Police (PSP), Lycoming County District Attorney's Office and now, the Pennsylvania Office of Attorney General.

Matthew and Christine Zeigler have eight (8) natural children; Eliot Zeigler (DOB: 05.30.94. current age: 26); Dorrit Zeigler (DOB: 12.12.95. current age: 24); Martin Zeigler (DOB: 07.23.98. current age 22); Nathanael Zeigler (DOB: 06.01.00. current age: 20); Rose Zeigler (DOB: 01.03.02. current age: 18); GZ (a minor female, DOB: 03.31.03. current age: 17); CZ (a minor male, DOB: 03.27.05. current age: 15) and NZ (a minor female, DOB: 11.29.06. current age: 14).

On April 16, 2020 the defendant, Matthew Zeigler, while engaged in an argument with Christine, discharged a firearm twice within the occupied Zeigler residence at 2335 Northway Road Extended in Williamsport Pennsylvania 17701. Present within, or around the home, were his spouse, Christine, and his children, Nathanael, Rose, GZ, CZ and NZ. The defendant, Matthew Zeigler, was arrested and charged with Simple Assault and Recklessly Endangering Another Person. Matthew Zeigler pled guilty on 11.12.20 to one count of Recklessly Endangering Another Person, 18 Pa.C.S.A. §2705 (M2). The stated victims in that guilty plea were two occupants of the house across the street, and his daughter Rose, who was outside when Matthew Zeigler fired the gun out the window. Sentencing is scheduled for 01.07.20. Subsequently, numerous interviews of the Zeigler children were conducted and yielded accounts supporting charges of Endangering the Welfare of a Child, Intimidation of a Witness, Obstructing the Administration of a Law or Other Governmental Function and Indecent Assault.

As a result of these various investigations and testimony delivered at dependency hearings, the three minor children, GZ, CZ and NZ, were removed from the Zeigler residence by LCCYS on 05.22.20 and placed into temporary foster care.

"N" ZEIGLER

Fourteen (14) year old daughter, NZ, was interviewed by Law Enforcement, including this Agent, as well as LCCYS case workers. NZ gave a forensic interview at the Child Advocacy Center on 05.01.20 and testified at the LCCYS dependency hearing on 06.05.20. On these various occasions NZ reported years of physical and emotional abuse inflicted by her parents, Matthew and Christine Zeigler. NZ endured punishments that were excessively dispatched. One punishment NZ received was being made to stand with her arms outstretched for hours at a time. It would only end when one of the children admitted a supposed transgression. NZ estimated that the last time that she was punished in this manner was when she was about six (6) or seven (7) years old (Around 2013).

NZ also received beatings with a leather belt, with the number of lashes being equivalent to, or multiplied by her age by five (5). For example, NZ recalled receiving approximately fifty (50) consecutive spankings when she was ten years old (2016). Throughout her childhood NZ witnessed her siblings receive the same punishments that she had received, in some cases worse. NZ observed her brother Eliot, who had two broken arms in casts, be made to hold his arms out at his sides with books on each arm. NZ saw her brothers be placed into closets. NZ watched as one brother received approximately four hundred (400) spankings. Once, NZ saw Matthew grab Rose during an argument about her being a Vegan. NZ approximated that the last time that she received a spanking in this manner was when she was around eleven (11) years old (Around 2017). NZ estimated that it was around the summer of 2017 because her dogs were really young.

NZ said that all of the foregoing punishments she suffered and witnessed were ordered and administered by her father Matthew. NZ reported that her mother Christine observed these punishments, but did nothing to stop Matthew or to help her or her siblings. NZ was also subjected to her father Matthew making sexual remarks about her mother and grabbing Christine in front of NZ, as well as physical abuse of her mother by her father. One such instance NZ observed was Matthew choking Christine and pushing her against a wall.

NZ disclosed that Matthew touched her buttocks one, and would "get perverted" when he was "drunk".

NZ was present within the Zeigler residence on 04.16.20 when the defendant, Matthew Zeigler, fired two (2) rounds from inside of the home. NZ heard her mother and father arguing and then heard the two gunshots. NZ was on the floor above her parents at the time of the incident.

On the night before the CAC interview on 05.01.20, Matthew talked to her and her sister, GZ, separately, and told them to "tell the truth in a beautiful way" and that "there is a chance that I could go to jail by commission and your mother could go to jail for omission". NZ said that she understood these statements to be directions from Matthew to make him look good, and not accurately report what happened in their home.

"C" ZEIGLER

Fifteen (15) year old son, CZ, was interviewed by Law Enforcement, LCCYS case workers and this Agent. CZ gave a forensic interview at the Child Advocacy Center on 05.07.20. CZ has Cerebral Palsy which renders his speech hard to understand. CZ was able, however, to clearly communicate that his father, Matthew Zeigler, punches him in the chest with hard force. CZ did this by repeatedly physically demonstrating on himself how Matthew punched him.

CZ was present within the Zeigler residence on 04.16.20 when the defendant, Matthew Zeigler, fired two (2) rounds from inside of the home.

"G" ZEIGLER

Seventeen (17) year old daughter, GZ, was interviewed by Law Enforcement, LCCYS case workers and this Agent. GZ gave a forensic interview at the Child Advocacy Center on 05.01.20 and testified at the LCCYS dependency hearing on 06.05.20. GZ described her years of punishments that were carried out on her by her father, Matthew Zeigler. On numerous occasions, starting when she was around ten (10) years old, GZ was made to stand with her arms out at her sides, once for more than one (1) hour. When GZ was twelve (12) or thirteen (13) years old (2015/2016) her father spanked her with a belt, to the point that it left visible belt imprints on her skin. GZ, like NZ, said that the number of lashes was related to the child's age. GZ witnessed most of her siblings receive these excessive spankings with a belt and recalled her brother, Nathanael, being hit approximately one hundred (100) times. The last time that GZ was spanked in this manner was approximately 2015.

GZ was also placed in a closet as punishment and made to stay there for two (2) days when she was less than ten (10) years old, thus approximately 2013. Also around this age and time period, GZ was made to wash her mouth out with liquid soap.

GZ reported that these punishments were instituted by Matthew, but observed by Christine, who even continued the punishments on occasion. Specifically, Christine beat GZ with a belt. GZ did not recall Christine ever stopping the punishments, or coming to the aid of the children.

On more than one occasion, Matthew Zeigler grabbed and touched GZ's buttocks. The last time was in 2019, when Matthew Zeigler grabbed GZ's buttocks while she was in the kitchen doing dishes. GZ would have been fifteen (15) or sixteen (16) at the time of this incident. GZ advised Matthew Zeigler that she did not like what he had just done to her.

GZ was also subjected to Matthew's sexual remarks about and physical abuse of Christine. GZ was aware that if her father wanted to have sex with her mother, it was going to happen whether she wanted it to or not.

GZ was present within the Zeigler residence on 04.16.20 when the defendant, Matthew Zeigler, fired two (2) rounds from inside of the home.

After the shooting on 04.16.20, but before the CAC interview on 05.01.20, Matthew Zeigler told GZ and her siblings to "tell the truth in a beautiful way". GZ took this to mean that she was not to make her father look bad.

ROSE ZEIGLER

Eighteen (18) year old daughter, Rose Zeigler, was interviewed by Law Enforcement and LCCYS case workers and provided details of the punishments that she endured throughout her childhood, by her father, Matthew Zeigler. Rose recalled an incident when she was approximately around eight (8) years old (2010) where she, and her siblings, were awakened by Matthew around 2 A.M. and made to drink white vinegar until vomiting. Matthew also made Rose do exorbitant numbers of push-ups and sit-ups as punishments.

Matthew beat Rose with belts and spoons, causing bruising on her buttocks. Rose also sustained bruising on her arms where her father grabbed her in 2019 during an argument about Rose being a vegan. Prior to the age of twelve (12) or thirteen (13), it was common for Matthew to punish Rose by making her stand with her arms outstretched for long periods of time. Matthew would also force Rose to swish liquid soap around in her mouth for fifteen to twenty (15-20) minutes when she was about twelve (12) or thirteen (13) years old.

Rose had her eating privileges taken away for long periods of time by Matthew. Once Rose had food withheld for three (3) days, around 2012. Her father also was aware of food allergies that Rose had and he would put those things in her food as a "joke".

Rose witnessed her siblings receive the same punishments. Rose observed her brothers placed in closets for days without food and water. Rose also saw her brothers being spanked excessively and sat on by their father around 2015. Rose has witnessed Matthew punch her brother, CZ, in the chest.

Rose reported that although Matthew never actually touched her, he would make comments about all of his daughter's bodies, which made them uncomfortable. She heard Matthew compare Gretchen's breasts to Christine's, and he came into the bathroom once when she was naked in the shower.

Rose testified at the dependency hearing that Christine Zeigler did nothing when Matthew was abusing her and her siblings. She testified that Christine herself beat Rose with a belt.

Matthew and Christine always told the children that if they ever reported anything to Children and Youth Services that they would be put into foster care, where they could possibly be raped and murdered. For this reason, the children were afraid to disclose the abuse and always felt helpless with their plight.

Rose was walking up the driveway towards the Zeigler home on April 16, 2020 when the defendant, Matthew Zeigler, fired two (2) rounds from within the home. Rose was one of the victims of the crime of Recklessly Endangering Another Person, 18 Pa.C.S.A.§2705, that Matthew Zeigler pled guilty to on 11.12.20.

Rose said that Christine Zeigler was present for most of the punishments imposed by Matthew. Rose never saw Christine challenge Matthew's discipline. Rose said Christine would also impose punishment, although she was not as "angry" as Matthew.

MARTIN ZEIGLER

Twenty two (22) year old son, Martin Zeigler, was interviewed by Law Enforcement and LCCYS case workers, and testified at the LCCYS dependency hearing on 05.22.20. Martin reported receiving the following punishments as a child.

Martin stated that he was forced by Matthew to do extreme repetitions of push-ups and sit-ups. When this punishment stopped working, Matthew would withhold food for up to one (1) week by. Martin was also locked in a closet or placed in a doorway for up to one (1) week by Matthew. Martin recalled these two (2) confinements happening more than ten (10) times and that he was around fourteen (14) or fifteen (15) years old the last time that he was punished in this manner (

Approximately around 2012). Martin was also made to drink vinegar and liquid soap until he vomited. Martin was also struck with a belt, both the leather part and the metal buckle, anywhere from ten (10) to approximately five hundred (500) times. Martin said that all of the children were hit with a belt. They would have to say "thank you for correcting me, sir" or would get more. Martin said he was hit often until he moved out at age seventeen (17). Martin reports he still suffers from loss of feeling in his buttocks as a result of the beatings.

Moreover, when the beatings with a belt did not garner the response Mathew desired, he would punch Martin in the face and chest, and/or hit him with rods, rulers or sticks.

Martin said Christine Zeigler observed these punishments and did nothing to stop them or aid Martin.

Martin recalled another incident approximately around 2012 where he and his brother, Nathanael Zeigler, were in the basement with their father addressing a plumbing issue. Matthew became angry that the boys did not correct the problem to his liking, so he smeared human feces that had leaked from a sewer pipe onto both boys' chests.

Martin was also forced to work at the family owned Papa John's starting when he was thirteen (13) years old. He worked as many at sixty (60) hours per week and was never paid.

Martin has witnessed his father's sexual advances towards his mother and was aware that this was the topic that usually ended up in an argument between his parents.

On the prior occasions that Children and Youth went the Zeigler home for an incident, the defendant, Matthew Zeigler, would speak to the children before they were questioned. Matthew told Martin and the others that if they talked about the things that occurred in the house that they would be sent to foster care, where they may be separated or put in abusive homes and could be raped. Martin recalled talking to a case worker when he was sixteen (16) years old (2014) and told him everything. Nothing ever happened to his dad and he was spanked for talking.

Martin was not present at the Zeigler home at the time of the April 16, 2020 shooting incident but was contacted by his father after the arrest. Matthew asked Martin if he was going to speak to anyone about him and then tried to guilt him into not speaking about anything.

DORRIT ZEIGLER

Twenty four (24) year old daughter, Dorritt Zeigler, was interviewed by Law Enforcement, LCCYS case workers and this Agent, and testified at the LCCYS dependency hearing on 05.22.20. Dorritt described her childhood as a "Shroud of Darkness".

Dorritt described being punished by Matthew when she was between nine (9) and twelve (12) years old (2004 – 2007) by having to do extreme repetitions of push-ups and sit-ups, possibly five hundred (500) of each. Dorritt was also made to do pull-ups, which she was unable to do. Dorrit described how once she was unable to complete this pull-up punishment, her father became angry and started to smash her head against the pull-up bar. Dorritt remembered her mother trying to stop Matthew but Christine ended up being thrown across the room, against a wall, and having shelving fall on top of her. This was the only occasion described by any of the Zeigler children where Christine came to their aid.

Dorritt was also placed in a closet for long periods of time by Matthew and had food withheld for up to a week.

Dorrit said that the oldest child, Eliot Zeigler, received the worst of the child abuse.

Dorritt was also forced to work at the family owned Papa John's pizza shop beginning at the age of thirteen (13) (2008). Dorritt had to work anywhere from forty (40) to eighty (80) hours per week. Dorrit never received any payment for this labor.

Dorrit advised that if Children and Youth or the Police came to the house to investigate an incident, her father would tell the agency that it was the law that he had the right to be present when the children were questioned. Dorrit had also been told by Matthew prior to such interviews that if she told what was going on in their home that they would be sent to foster care where they could get raped or killed.

DEFENDANT MATTHEW ZEIGLER

On 11.18.20 your affiant interviewed defendant, Matthew Zeigler. Following a written and verbal waiver of Miranda Rights, Matthew Zeigler was asked if he understood the allegations being made by his children. Matthew Zeigler stated that, in part, he understood. Matthew Zeigler said that he thought that his daughter, NZ, was complaining about spankings and his yelling at her mother, Christine Zeigler. He thought that his son, CZ, was complaining about being hit in the chest, one (1) time, by him and his yelling at CZ's mother, Christine Zeigler. Lastly, Matthew Zeigler assumed that his daughter, GZ, complained of having to stand with her arms out at her sides and Matthew's yelling at GZ's mother, Christine Zeigler.

Matthew Zeigler named all of his natural children as follows, from youngest to oldest: NZ, CZ, GZ, Rose Zeigler, Nathanael Zeigler, Martin Zeigler, Dorrit Zeigler and Eliot Zeigler.

Matthew Zeigler described some of the punishments that he and Christine Zeigler administered on the children. Matthew Zeigler recalled the earliest form of punishment for the children as being them having to stand with their arms straight out at their sides. Matthew Zeigler said the punishment would start out as a five (5) minute punishment but each time the children would drop their arms, five (5) more minutes would be added on, and so on. Matthew Zeigler recalled the longest period of time elapsing for this punishment as being thirty (30) minutes. Matthew Zeigler recalled that this punishment was only used on Eliot, Dorrit, Martin and Nathanael.

Matthew Zeigler described how spankings were administered in his home. Matthew Zeigler said that "we" had a general rule regarding spankings. Matthew Zeigler said that unfortunately, it often did not work out that way and that he would reach a point of frustration. The spankings, instead of being a consequence of what the kids did wrong, became a way to impress upon them that they were still doing something wrong. The spankings then were administered out of anger. Matthew Zeigler said "we" gave one (1) swat per year of the child's age. He stated that by the age of thirteen (13) "they", generally, were done spanking the kids. Matthew Zeigler added that if the children struggled or refused to be spanked, they received additional swats. Matthew Zeigler gave the example: "If they were eleven (11) they got eleven (11) swats and then if additional swats were to be added they got eleven (11) more."

Matthew Zeigler said that after a while we just started to use a belt. Zeigler said that it was a leather belt and that it would get doubled over and the swats would be administered with the leather strap. Matthew Zeigler added that all of the children received spankings with a belt.

Matthew Zeigler said that the punishments would usually turn into frustration and that he did spank some of the children harder when he was frustrated. Matthew Zeigler was asked if any of the children were ever injured or had marks that lasted longer than an hour. Matthew Zeigler said that is why they started to use a dowel rod to give spankings. He said that Dorrit was around two (2) or three (3) years old and she had marks on her body and the babysitter saw them and said that she was going to report them.

Zeigler said that sit-ups and push-ups were used, specifically naming Eliot and Dorrit. Matthew Zeigler said that from ages ten (10) to fourteen (14) the children would start by doing twenty-five (25) repetitions. If they would not do them they would now have to do fifty (50) or now do a hundred (100). Matthew Zeigler said that he would tell the kids to do one thousand (1,000) and then he would leave the room. Matthew Zeigler said that as long as they were doing them when he returned to the room they would be allowed to stop. If the children could not complete the assigned task, that punishment would not be taken away, but an additional punishment would be added.

Matthew Zeigler said that the children would have to sit in a closet, specifically the closet that was outside of his bedroom. He described this closet as being three (3') feet by five (5') feet. He said that the kids would be sent there if they did not

complete their schoolwork. Matthew Zeigler said that the children would be sent in the closet with their schoolwork to complete it. The kids would be told that they could not come out until the work was complete. Matthew Zeigler said that for the two oldest kids, Eliot and Dorrit and possibly Martin, would be sent to the closet and would not be allowed to eat. Matthew Zeigler said that it might last a couple of days, specifically with Eliot and Dorrit. This closet was made into a punishment closet by removing everything from it. The kids would be allowed to come out of the closet to ask if they could do something, like go to the bathroom. I asked Matthew Zeigler if they were allowed to come out of the closet to eat and he said that he thought that they were, if they had not had their eating privileges removed also.

Matthew Zeigler stated that food was taken away for failing to do schoolwork. I asked Matthew Zeigler which children this punishment was applied to and he said that it was Dorrit, when she was about thirteen (13) years old and to Eliot, for a short period of time, when he was thirteen (13) or fourteen (14) years old. I asked Matthew Zeigler what the longest period of time was and he said that there were a couple of times for Dorrit that she was in the closet for a period of days. Matthew Zeigler added that he could only recall the children being placed in the closet for a period of a couple of days. He said that it was certainly too long and that he would certainly charge someone with a crime for what he had done.

Matthew Zeigler was asked about the family owned and run Papa John's Pizza shop and what kids worked there. Matthew Zeigler stated that Eliot worked there when he was seventeen (17) years old, Dorrit when she was fourteen (14) years old, Martin when he was sixteen (16) years old and Nathanael when he was sixteen (16) years old. With regard to paying the children, Matthew Zeigler said that Christine Zeigler supposedly set up bank accounts for each one of the kids that were working there but that he never personally observed them.

Where it pertained to Eliot, Matthew Zeigler could not recall how many hours Eliot would normally work. Eliot worked shift and delivery and continued to do so after he graduated high school. Zeigler said that Eliot may have felt pressured to work at the restaurant.

For Martin, Matthew Zeigler said that he may have worked twenty (20) hours per week. He said that he did not have a good work ethic and that he mostly worked over the summers. Matthew Zeigler said that he did not know how Martin got paid.

For Nathanael, Matthew Zeigler said that he also did not have a good work ethic and he could not recall how many hours that Nathanael worked or how he was compensated.

He said that Dorrit worked approximately fifty-six (56) hours per week. Matthew Zeigler said that he believed that Christine Zeigler had established a bank account at Woodlands bank in Williamsport to pay Dorrit.

Matthew Zeigler said that none of the children were made to work at the Papa John's against their will.

Matthew Zeigler was asked if it may have been portrayed to his children that working at the Papa John's was what the family needed from them and it would become a guilt issue used against them. Zeigler said that it could have been perceived as such and they were really needed and they should feel guilty if they did not do it. Matthew Zeigler was asked if the kids felt pressured to work at the Papa John's and he said that Eliot did. Matthew Zeigler said that it was possible that Dorrit felt pressured to work all of the hours that she did because Matthew Zeigler always needed workers.

Matthew Zeigler and I discussed the topic of Lycoming County Children and Youth Services (LCCYS) or other law enforcement agencies responding to their residence. Matthew Zeigler said that prior to CYS coming to the house the family would sit down as a group, usually in the living room, and discuss the upcoming meeting

Matthew Zeigler spoke about an incident around 2015 where GZ was reportedly depressed and LCCYS came to the house to investigate. Matthew Zeigler seemed to recall that prior to CYS arriving, he told GZ and Rose about a case that he had worked on where the child was placed into foster care and that they had been raped or killed. Matthew Zeigler recalled there

being testimony recently about this story and said that on at least on occasion he recounted this story to the children. Matthew Zeigler said that in retrospect, he could see how this would have been manipulative.

Matthew Zeigler was asked if, contextually, prior to the children speaking with LCCYS, he had spoken with them and told them about the case where a child spoke with LCCYS, went to foster care, and were raped and beaten. Matthew Zeigler replied, "Yeah, I think it is".

I directed Zeigler to the 04.16.20 shooting incident as it pertained to LCCYS. Zeigler said that he definitely spoke with the children prior to them speaking with LCCYS, but that it was not about them speaking to LCCYS.

LCCYS made an appointment to speak with the children at the Charwell Building. Prior to this meeting, Matthew Zeigler spoke to GZ and NZ. He recalled their testimony being that he told them to tell the truth beautifully. Zeigler recalled telling the girls to tell the truth, to be humble and something else that he could not remember. Matthew Zeigler said that he did not recall using that phrase but that he had been drinking a lot at the time, so it was hard to tell what he may have said.

I asked Zeigler if he thought that the children felt free to speak with the Police or other agencies and he said that there were times when they did and times when they did not. He said that, looking back, that his comments about being raped in Foster care must have come across as very manipulative. He said that he could imagine that they did not feel free to speak with LCCYS at that point. Matthew Zeigler was asked if he thought that the children were afraid to speak about some of the incidents and he said that he does now. I asked if that included all of the kids and after a long pause he said yes.

Matthew Zeigler was asked what Christine Zeigler's role was in all of these incidents because she is their mother and she was present. He said that if she spanked the children that she would swat them one (1) time on the behind per their years of age. Matthew Zeigler said that he knew that this was the case because she is the one that came up with the idea to handle spankings in this way. Matthew Zeigler said that he believes that she implemented this because she thought that some of the things that he was doing bordered on excessive. Matthew Zeigler was asked if he had any examples of what Christine Zeigler may have thought were excessive and he said that there were times when he would be very angry and that he would spank out of anger.

Matthew Zeigler was asked if any of his touching of the girls could have seemed inappropriate. Matthew Zeigler said that the only thing that he could think of would be that he smacked them on their butts. Matthew Zeigler said that he did this to all of the children and that it was meant as an encouragement. He said that GZ and Rose said that they did not like it when he did that but it probably did happen a few more times after they said that Matthew Zeigler was asked if he had ever placed his hands on any of the girl's hips or squeezed their buttocks and he said that he most certainly did not place his hands on their hips and he did not recall ever squeezing their butts.

Matthew Zeigler was asked about CZ being hit in the chest by him. Matthew Zeigler said that on one occasion, between October and December of 2019, around 2330 hours he was passed out in his chair with the television remote. Zeigler said that CZ was trying to sleep and the TV volume was bothering him. Matthew Zeigler assumed that CZ tried to take the remote but he could not get it out of Zeigler's hand so CZ dug a fingernail into Zeigler's hand and grabbed the remote. Zeigler said that he woke up and thought that he was being attacked so he started swinging. Matthew Zeigler said that after punching CZ in the chest a couple of times he realized who it was and stopped. Zeigler said that he still has a scar on his hand from where CZ drew blood and that he still has a scar, which he took a picture of

POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR.150.20	12/03/2020	U 9386230.0	BCC200217

Defendant Name:	First:	Middle:	Last:
	CHRISTINE	G	ZEIGLER

Without exception, all of the Zeigler children stated that their father, Matthew Zeigler, was the abusive actor in these incidents and that their mother, Christine Zeigler, rarely, if ever stepped in to stop him. Additionally, if Matthew told Christine Zeigler to carry out a punishment on the children, she did so.

Based on the information above I respectfully request a Warrant of Arrest be issued against Christine Zeigler for Endangering the Welfare of Children.

I, SPECIAL AGENT BARTON SEELIG, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE *CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA* THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

(Signature of Affiant)

Sworn to me and subscribed before me this 3 day of DECEMBER 2020

Date , Magisterial District Judge

Magisterial District 29-3-01
Commonwealth of Pennsylvania
Lycoming County
Magisterial District Judge

My commission expires first Monday of January, 2022