

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **BLAIR**

Magisterial District Number:

24-3-03

District Justice Name: Hon.

ELIZABETH A. DOYLE, ESQ.

Address:

**311 UNION STREET
HOLLIDAYSBURG, PA**

16648

Telephone: (**814 693-3210**)

Docket No.:

Date Filed:

OTN:

(Above to be completed by court personnel)



**PRIVATE
CRIMINAL COMPLAINT**

COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

NAME and ADDRESS

Ms. Sally A. Zeek
423 Allegheny Street
Blair County Courthouse
Hollidaysburg, Pa 16648

(Fill in defendant's name and address)

Notice: Under PA Rules of Criminal Procedure, your complaint may require approval by the District Attorney before it can be accepted by the magisterial district court. If the District Attorney disapproves your complaint, you may petition the court of common pleas for review of the District Attorney's decision.

Fill in as much information as you have.

Defendant's Race/Ethnicity <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> Native American <input type="checkbox"/> Unknown		Defendant's Sex <input type="checkbox"/> Female <input type="checkbox"/> Male	Defendant's D.O.B.	Defendant's Social Security Number	Defendant's SID (State Identification Number)
Defendant's A.K.A. (also known as)		Defendant's Vehicle Information Plate Number State Registration Sticker(MM/YY)		Defendant's Driver's License Number State	

I, Robert G. Kearns, Jr.

(Name of Complainant - Please Print or Type)

do hereby state: (check the appropriate box)

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

☐ I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe

with violating the penal laws of the Commonwealth of Pennsylvania at the Blair County Courthouse
(Place Political Subdivision)

situated at Hollidaysburg, Pa.

in Blair County on or about July 1999

Participants were: (if there were participants, place their names here, repeating the name of above defendant)

Sally A. Zeek and Hiram A. Carpenter.

2. The acts committed by the accused were:

(Set forth a summary of the facts sufficient to advise the defendant of the nature of the offense charged. A citation to the statute allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section and subsection of the statute or ordinance allegedly violated.)

Ms. Sally A. Zeek became involved with my custody case (96 GN 2139) as the court reporter for the custody hearings of February 2, 1999 and April 5, 2000.

After producing a transcript of the February 2, hearing in July 1999, I had discovered through my examination of that transcript to be replete with errors. The nature of the errors could not be classified as the standard excuses such as typographical mistakes, or misstatements that normally could be expected in typing projects of this type. Neither were they off record discussions. The February, 2nd. transcript divulged deletions of

Defendant's Name:

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**PRIVATE
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testimony and new dialogue that was incorporated into the record. I had brought these discrepancies to Attorney Speice's attention and I told him the transcript was sabotaged.

During the transition period since Christa Miloro's departure Ms. Zeek has been acting as the administrator and spokesperson for Brenda Prosser, Ms. Miloro's replacement. Ms. Zeek has controlled, at least in my case, all the business transactions for Ms. Prosser. On December 20, 2000 I brought to Ms. Zeek's attention that the transcripts of April 6, and April 20, 2000 were inundated with discrepancies. In spite of my assertion's Ms. Zeek has taken it upon herself to endorse and verify the accuracy of the two transcripts that were certified to be the work of Brenda Prosser and Christa Miloro. Both transcripts were found by me and other family members to be inundated with unauthorized deletions, amplification of original testimony and inclusion of new dialogue that was no part of the proceedings. Ultimately, evidence was being removed and created through the tampering process.

As of this date of January 3, 2001 Ms. Zeek has not transcribed the testimony she recorded of April 5, 2000

In the official capacity of producing transcripts in the matter of Frederick vs. Kearns (docket # 96 GN 2139) Ms. Sally Zeek has violated Pennsylvania statutes 18 Pa C.S.A. 4911. Tampering with public records or information. 18 Pa C.S.A. 4910. Tampering with or fabricating physical evidence. 18 Pa C.S.A. 903. Criminal Conspiracy. 18 Pa C.S.A. 4304. Endangering Welfare of Children.

To commit 4911. R K

all of which were against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly, or in violation of (refer to above paragraph) and _____
(Section) (Subsection)

(PA Statute)

3. I ask that process be issued and that the defendant be required to answer the charges I have made.
4. 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.

[Signature]
(Signature of Complainant)

District Attorney's Office ☐ Approved ☒ Disapproved because:

as a matter of policy, alleged defendant is protected by judicial immunity, motive of officer is suspect and probable cause for these charges is lacking

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

(Signature of Attorney for Commonwealth)

(Date)

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

(Magisterial District)

(Issuing Authority)

SEAL

NOTICE TO PERSON SIGNING CRIMINAL COMPLAINTS

Pennsylvania Rules of Criminal Procedure provide that when a person who is not a Police officer wishes to sign a complaint charging another with a criminal offense, other than a summary offense, the complaint must first be submitted to the District Attorney's Office for approval or disapproval.

In order to assist the District Attorney's Office in reviewing your complaint, you must print or type, on this form a complete account of the events leading up to and including the criminal act you wish to complain about. This affidavit must indicate names, addresses and your own opinion as to the motives of the person complained about as well as an indication of your prior contacts, if any, with this person. Only complaints supported by a complete and detailed affidavit of the facts will be considered for approval.

TO BE COMPLETED BY COMPLAINANT

COMPLAINANT'S

NAME: Robert G. Kearns, Jr.

ADDRESS: RR#3 Box 254 A1

Hollidaysburg, Pa 16648

PHONE: 814-696-3022

DEFENDANT'S

NAME: Ms. Sally A. Zeek

ADDRESS: 423 Allegheny Street

Blair County Courthouse

Hollidaysburg, Pa 16648

PHONE: 814-693-3070

DATE: _____

TIME: _____

LOCATION OF INCIDENT: Blair County Courthouse

COMPLAINANT'S VERSION OF THE FACTS ON REVERSE SIDE OF THIS PAGE.

I further certify that these criminal proceedings are filed from proper motives and are not being brought for the purpose of collecting a civil obligation. On charges for Bad Checks (4105) and Theft of Leased Property (3932) proper legal notice has been given as required by said sections. I ask that a warrant of arrest or a summons be issued and that the accused be required to answer the charges I have made.

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

Robert G. Kearns, Jr. 19 _____

Sally A. Zeek _____
Complainant

Offense or Offenses . . .

Tampering with public records or information. Criminal conspiracy.

Tampering with or fabricating physical evidence. Endangering welfare of children.