

NON-PRECEDENTIAL DECISION - SEE SUPERIOR COURT O.P. 65.37

COMMONWEALTH OF PENNSYLVANIA	:	IN THE SUPERIOR COURT OF
	:	PENNSYLVANIA
	:	
v.	:	
	:	
	:	
ZACHARIAH ABRAHAM MEYERS	:	
	:	
Petitioner	:	No. 86 WDM 2026

Appeal from the Order Entered June 26, 2026
In the Court of Common Pleas of Washington County Criminal Division at
No(s): CP-63-CR-0000372-2026

BEFORE: OLSON, J., NICHOLS, J., and LANE, J.

MEMORANDUM BY LANE, J.:

FILED: September 29, 2026

Zachariah Abraham Meyers (“Meyers”) filed a petition for specialized review seeking this Court’s review of the order which denied his motion to modify bail.¹ We affirm.

¹ This Court treats such a petition as a notice of expedited appeal. **See** Pa.R.A.P. 1610 (providing for review of an order granting or denying release or modifying the conditions of release before sentence through a petition for specialized review); **see also** Pa.R.A.P. 1762(b) (explaining that an order relating to bail when no appeal is pending shall be subject to review pursuant to Chapter 16 of the Rules of Appellate Procedure); **Interest of N.E.M.**, 311 A.3d 1088 (Pa. 2024) (holding that review of a petition for specialized review involving a juvenile out-of-home placement order is mandatory in that this Court lacks discretion to decide whether to review the petition); **Commonwealth v. Miller**, 319 A.3d 575 (Pa. Super. 2024) (applying the rationale in **Interest of N.E.M.** to petitions for specialized review of bail filed under Pa.R.A.P. 1610).

We glean the following factual and procedural history from the certified record. Meyers, who is 19 years old, was allegedly involved in a “catfishing”² scheme when he was eighteen years old and still in high school. According to the affidavit of probable cause, Meyers posed as a woman and solicited nude, sexually explicit photographs and videos from at least twenty-one male minors to trade with others. Meyers coerced one minor victim into engaging in sexual acts with two adult men while videotaping the encounters and sending them to Meyers. Meyers instructed the minor victim as to what he wanted the minor to do with the adult males, which included oral and anal sex acts. Meyers also directed the same minor victim to secretly record videos in the high school wrestling team’s locker room with a hidden cell phone. Meyers additionally distributed nude images and videos of one minor victim to another minor. In relation to eleven of the minor victims, Meyers requested them to provide sexually explicit videos and photos, including videos involving them inserting toothbrushes and other objects anally and videotaping the activity. When one minor victim stopped sending Meyers graphic images, Meyers threatened to make public the content that he already possessed if the victim did not send him additional material. Meyers demanded \$500 from another minor victim

² “Catfishing” is the act of creating a fictitious online persona or fake identity on social media with the intent of deception, usually to mislead a victim into an online romantic relationship or to obtain illegal financial gain through fraud or extortion.

and threatened to send the victim's photos to family and friends, and when the victim failed to comply, Meyers sent the photos to the victim's sister.

As a result of these actions, the Commonwealth charged Meyers with 304 offenses, including multiple counts of trafficking in individuals, unlawful contact with a minor, photograph computer sex act, child sexual abuse material, sexual exploitation of children, contact with a minor—sexual abuse, unlawful contact with a minor—sexual exploitation, dissemination of child sex acts, corruption of minors, criminal use of a communication facility, sexual extortion—engage in sexual contact, and intercept communications. After his preliminary arraignment, Meyers requested and was denied bail. Meyers then waived a preliminary hearing in exchange for withdrawal of 237 charges. Meyers filed a motion for modification of bail, which the magisterial district court denied on the basis that Meyers was a flight risk and posed a danger to the community. Meyers thereafter filed a motion to modify bail in the trial court, which held a hearing on March 30, 2026, before denying the motion without prejudice.

Meyers filed another motion to modify bail in May 2026. The trial court conducted a hearing on the motion on June 12, 2026, at which time Meyers presented the testimony of Beth Bliss, Psy.D. ("Dr. Bliss"), a forensic psychologist retained by the defense, who the trial court accepted as an expert without objection. **See** N.T., 6/12/26, at 9. Dr Bliss testified that she conducted a psychosexual risk assessment of Meyers that included a clinical

interview, psychological testing (the MMPI-A, the J-SOAP, and the ERASOR), and a review of collateral records consisting of the police criminal complaint and Meyers' school records. **See id.** at 11. Dr. Bliss described Meyers as presenting no significant psychological concerns—no mental health history, no prior legal or disciplinary trouble, a stable family upbringing, strong academic performance, and active school involvement. **See id.** at 12-14. Dr. Bliss stated that Meyers' MMPI-A results showed no clinically significant elevations, with only mild defensiveness consistent with a forensic evaluation context. **See id.** at 17-18. On the adolescent risk assessment tools, Dr. Bliss indicated that the risk factors Meyers met were tied almost entirely to the nature of the charges themselves (multiple victims, male victims, offenses over a period of time) rather than to independent indicators like antisocial behavior, prior offenses, or psychological deviance. **See id.** at 19-22. Based on her evaluation, Dr. Bliss concluded that Meyers presented as a "moderately low" sexual recidivism risk, noting his stable background, rule-following tendencies, strong family support, and willingness to engage in treatment. **See id.** at 22-24. She recommended that, if released, he should be prohibited from unsupervised internet access and should engage with a sex offender treatment provider. **See id.** at 24.

On cross-examination, the Commonwealth highlighted that Dr. Bliss' opinion relied heavily on Meyers' self-reporting and that she did not interview family members or school personnel. **See id.** at 29-30, 34. The

Commonwealth also noted that the allegations themselves reflected a moderate degree of planning and grooming, which Dr. Bliss acknowledged while maintaining that Meyers' overall profile outside the current allegations was consistent with a lower-risk individual. **See id.** at 35-36.

The Commonwealth presented the testimony of Detective Edward Walker ("Detective Walker"), an eight-year veteran of the Peters Township Police Department, who testified primarily about his concerns regarding community safety if Meyers were released on bail. Detective Walker stated that there were twenty-one juvenile victims all living near Meyers, and that all of the alleged crimes were committed from within Meyers' home without him ever needing to leave. **Id.** at 40-41. Detective Walker described the neighborhood as a cul-de-sac with many families and children nearby, including frequent juvenile foot traffic on the adjacent Montour Trail. **See id.** at 41. He also noted the presence of numerous firearms and a significant amount of cash in Meyers' residence, which he suggested could facilitate flight. **See id.** at 40-41. On the question of internet restrictions, Detective Walker testified that keeping Meyers off the internet would be "almost impossible" given accessible Wi-Fi from neighboring homes and devices belonging to family members. **See id.** at 42-43. The detective further noted that when TikTok shut down at least five of Meyers' accounts, he simply opened three new ones under fictitious names, demonstrating his persistence in circumventing restrictions. **See id.** at 43.

On cross-examination, Detective Walker conceded that: all alleged conduct was carried out through internet-capable devices; a person without access to any internet-capable device could not access the internet; the firearms in the home belonged to Meyers' father and could be removed; and a search warrant had already resulted in the removal of electronic devices from the residence. **See id.** at 43–46. The detective also acknowledged that if Meyers were placed on electronic home monitoring with restrictions on internet-capable devices, he would only be able to access the internet if someone bought or sneaked a device into the house. **See id.** at 47. On redirect, the Commonwealth elicited that Meyers would not need a passport to flee within the state or country, and that his college-aged siblings may return home for the summer and bring their own electronic devices. **See id.** at 49–50. On recross, Detective Walker confirmed that Meyers does have a driver's license, having driven to school every day. **See id.** at 50.

The Commonwealth next presented the testimony of Officer Jeremy Crow ("Officer Crow"), a pretrial services officer with Washington County Adult Probation. Officer Crow testified that he completed a pretrial assessment report on Meyers and that the resulting risk score recommended that Meyers report to him by phone. **See id.** at 52–53. The officer explained that the assessment tool is driven primarily by age and criminal history rather than the nature of the charges, meaning that a young defendant with no prior record will typically score low regardless of the severity of the allegations. **See id.**

On the subject of “Net Nanny,” a program used to monitor internet usage and to filter content, Officer Crow testified that his office has no relationship with the program, that he would not be independently notified if Meyers accessed the internet, and that he would essentially be dependent on Meyers or his parents to self-report any breach. **See id.** at 53–54. The officer also clarified that electronic home monitoring does not require internet access, as a landline is sufficient. **See id.** On cross-examination, Officer Crow confirmed that his comments in the pretrial assessment report—which recommended that Meyers have no access to internet-capable devices—were informed by his knowledge of the full allegations, not merely the numerical assessment score. **See id.** at 55–56. He acknowledged that his office currently supervises one individual with a no-internet condition who is successfully living in the community without internet access. **See id.** at 56–57. However, the officer testified that he does not have the authority to search Meyers’ home or bedroom for devices, because Meyers has not been convicted and is presumed innocent, thereby precluding warrantless searches. **Id.** at 59. The officer agreed that the trial court could impose a condition requiring the family to consent to such searches, which would make a refusal a violation of the court order. **See id.** at 58–59. On redirect, Officer Crow further noted that over 200 people in Washington County are currently on electronic home monitoring bracelets and that, on the pretrial side, he has had multiple instances of defendants cutting off their bracelets. **See id.** at 59–60.

Following the conclusion of testimony, defense counsel requested that Meyers be released from jail, placed on electronic home monitoring, ordered to seek treatment, and ordered to have no internet access and no contact with the victims. **See id.** at 63. Defense counsel also suggested that the trial court could authorize pretrial services to search Meyers' room and home for devices, if necessary. **See id.** at 64. The Commonwealth countered that the charged offenses all occurred while Meyers and both parents were at home and argued that the safety of the community and Meyers' presence at trial could not be guaranteed if he were on electronic home monitoring. **See id.** at 69. At the conclusion of the hearing, the trial court acknowledged that community safety and flight risk were the chief concerns in the matter. **See id.** at 70. The court stated that, based upon the testimony presented, it determined that Meyers' circumstances had not changed, and there were no conditions that could ensure the safety of the community and avoid the risk of flight. **See id.** The court noted the "sophistication and manipulation" that were alleged, Meyers' proximity to other minor victims, the number of people inside and outside his home, the location, the fact that other people were present in the home when the alleged offenses occurred, and the inherent concerns associated with electronic home monitoring as factors supporting its decision to deny Meyers' request to modify bail. **Id.** Accordingly, the trial court denied Meyers' bail motion in open court and signed an order denying

the motion on that same date. However, for unknown reasons, the order was not entered on the trial court docket until June 26, 2026.

On July 27, 2026, Meyers filed the instant petition for specialized review in this Court pursuant to Rule 1610. By order of August 4, 2026, this Court directed: (1) the trial court to provide a statement setting forth its reasons for the bail order, as required under Pa.R.A.P. 1762(e); and (2) the Commonwealth to file a response. Both the trial court and the Commonwealth complied with these directives.

Meyers presents the following issue for our review: “Whether the trial court abused its discretion and/or erred as a matter of law by denying [Meyers a bail] bond when he is not a flight risk and there are conditions available to assure the safety of the community.” Petition for Specialized Review at 6.

When presented with a petition for specialized review of a bail order, this Court reviews the order for an abuse of discretion, reversing only where the trial court misapplies the law, its judgment is manifestly unreasonable, or the evidence of record shows that its decision is a result of partiality, prejudice, bias, or ill will. **See Commonwealth v. Bishop**, 829 A.2d 1170, 1172 (Pa. Super. 2003). Moreover, this Court’s scope of review is limited to the record evidence adduced at the bail hearing and the findings of the lower court, reviewed in the light most favorable to the prevailing party. **See Commonwealth v. Talley**, 265 A.3d 485, 527 (Pa. 2021). This Court will affirm the trial court’s order “if [the court’s] factual findings are supported by

competent evidence of record, and [its] legal conclusions drawn therefrom are correct.” ***Id.***

The right to bail, with certain exceptions, is enshrined in the Pennsylvania Constitution, Article I, Section 14, which provides in pertinent part:

All prisoners shall be bailable by sufficient sureties, unless for capital offenses or for offenses for which the maximum sentence is life imprisonment or ***unless no condition or combination of conditions other than imprisonment will reasonably assure the safety of any person and the community when the proof is evident or presumption great***[.]

PA. CONST. art. I, § 14 (emphasis added).

In ***Talley***, the Pennsylvania Supreme Court conducted a thorough analysis of a defendant’s right to bail pursuant to Article I, Section 14 of the Pennsylvania Constitution, concluding as follows:

[A] trial court may deny bail under Article I[,], Section 14 when the Commonwealth’s proffered evidence makes it substantially more likely than not that the accused: (1) committed a capital offense, (2) committed an offense that carries a maximum sentence of life imprisonment, or (3) presents a danger to any person and the community, which cannot be abated using any available bail conditions. That determination requires a qualitative assessment of the Commonwealth’s case.

Talley, 265 A.3d at 525-26 (emphasis added). The High Court provided a non-exhaustive list of factors a trial court should consider in denying bail, including: (1) the defendant’s character, (2) relevant behavioral history or past patterns of conduct, (3) the gravity of the charged offense, (4) the conditions of bail reasonably available to the court, and (5) any evidence that

tends to show that those conditions would be inadequate to ensure the protection of any person or the community.³ **See id.** at 525. Thus, according to the **Talley** Court, “[i]f the balance of the evidence is rife with uncertainty, legally is incompetent, requires excessive inferential leaps, or lacks any indicia of credibility, it simply is not evident proof, nor can it give rise to a great presumption, that the accused is not entitled to bail.” **Id.** at 526.

In the instant petition, Meyers argues that the trial court abused its discretion in denying him bail when he is not a flight risk and there are conditions available to ensure the community’s safety. **See** Petition for Specialized Review at 6. Meyers contends that he is not a flight risk, pointing to his lifelong residence in Peters Township, his deep family ties to the area, his lack of any criminal or juvenile history, his absence of a passport, and his young age of 19. **See id.** at 7. He argues that any residual concerns could

³ These factors either largely mirror or overlap with factors set forth in Pa.R.Crim.P. 523(A), relating to release criteria. The Rule 523(A) factors include: (1) the nature of the offense charged and any mitigating or aggravating factors that may bear upon the likelihood of conviction and possible penalty; (2) the defendant’s employment status and history, and financial condition; (3) the nature of the defendant’s family relationships; (4) the length and nature of the defendant’s residence in the community, and any past residences; (5) the defendant’s age, character, reputation, mental condition, and whether addicted to alcohol or drugs; (6) if the defendant has previously been released on bail, whether he or she appeared as required and complied with the conditions of the bail bond; (7) whether the defendant has any record of flight to avoid arrest or prosecution, or of escape or attempted escape; (8) the defendant’s prior criminal record; (9) any use of false identification; and (10) any other factors relevant to whether the defendant will appear as required and comply with the conditions of the bail bond.

be adequately addressed through electronic home monitoring, which would alert Washington County Probation if he were to leave the home. **See id.** Meyers further argues that conditions exist to reasonably assure the safety of the community, focusing on the fact that every alleged offense was committed through a cellphone or internet-capable device with no direct physical contact. **See id.** at 8. He points to the Washington County Probation pretrial assessment report recommending release and in-person reporting, Officer Crow's testimony that his office already supervises one individual under a no-internet condition, and Dr. Bliss's conclusion that Meyers poses a low risk of recidivism. **See id.** at 8-9. Meyers acknowledges Detective Walker's testimony that it would be impossible to ensure that Meyers would not have internet access if living at home. **See id.** However, Meyers points out that he suggested a comprehensive set of conditions—electronic home monitoring, no access to internet-capable devices, mandatory mental health treatment, consent to unannounced searches of the residence, and "Net Nanny"—to ensure he does not repeat the conduct that led to the instant charges. **See id.** at 9-10. Meyers argues that the trial court applied an improperly heightened standard by demanding a guarantee of community safety rather than the assurance required by Article I, Section 14 of the Pennsylvania Constitution. **See id.** at 10-11. Meyers contends that accepting the court's reasoning would effectively mandate pretrial detention for anyone charged with an internet-related offense, since no condition can mathematically

eliminate every possibility of a violation. **See id.** at 10. Accordingly, Meyers requests that this Court modify his bail and permit him to be released with conditions. **See id.** at 12.

In response, the Commonwealth argues that the trial court did not abuse its discretion in denying bail, and that the record—viewed in the light most favorable to the Commonwealth as the prevailing party—contains competent evidence supporting the court’s decision. The Commonwealth notes that defense counsel conceded at the bail hearing that it would be “impossible to prevent anybody from accessing internet,” undermining Meyers’ argument that internet restrictions could assure community safety. **See** Commonwealth’s Answer, at 23 (*quoting* N.T., 6/12/26, at 64). The Commonwealth further attacks the reliability of Dr. Bliss’s evaluation, noting that she was retained and paid by the defense, that her opinions were based largely on Meyers’ own self-reporting without corroboration from family members, school personnel, or victims, and that portions of her testing were incomplete because the charges were still pending. **See id.** at 24-25. The Commonwealth also challenges the weight of the pretrial assessment report, pointing to Officer Crow’s testimony that the assessment tool does not account for the nature or severity of the charges. **See id.** at 24. Finally, the Commonwealth points out that, although defense counsel was invited to provide further information regarding Net Nanny’s capabilities after

suggesting it at the March 30, 2026 bail hearing, defense counsel offered no additional information at the June 12, 2026 bail hearing.⁴ **See id.**

The Commonwealth highlights the evidence and testimony supporting the trial court's decision, particularly Detective Walker's testimony regarding the twenty-one juvenile victims living in close proximity to Meyers' home, the fact that all the alleged crimes were committed from within that home without Meyers ever needing to leave, the presence of weapons and cash in the residence, the neighborhood's proximity to children, and Meyers' demonstrated pattern of reopening TikTok accounts after they were shut down. **See id.** at 25–28. The Commonwealth also points to the trial court's statement, which emphasized, *inter alia*, the sophistication and planning of the alleged offenses, the fact that the conduct was undeterred even after the accounts were shut down, Meyers' access to financial resources, the presence of children in the community, and the failure of defense counsel to identify any practical mechanism for enforcing internet restrictions or provide any case law supporting the proposed conditions. **See id.** at 28–30 (*quoting* Trial Court Statement, 8/14/26, at 10-12 (footnotes omitted)). On this basis, the

⁴ At the March 30, 2026 bail hearing, defense counsel asserted that there were "numerous cases in this Commonwealth" where part of a convicted sex offender's sentence was to stay off the internet. Trial Court's Statement, 8/14/26, at 5 (*citing* N.T. Bail Hearing, 3/30/26, at 7). The trial court requested that counsel provide citations to such cases for its review. **See id.** (*citing* N.T. Bail Hearing, 3/30/26, at 8-9). However, counsel did not provide any such citations.

Commonwealth contends that Meyers has not established that the trial court's factual findings lack record support or that its legal conclusions are incorrect. **See id.** at 30. Accordingly, the Commonwealth requests that this Court deny the instant petition.

In its statement to this Court, the trial court explained that it denied Meyers' request for bail modification based on a totality of factors drawn from the record of both bail hearings. **See** Trial Court Statement, 8/14/26, at 12. The court found that Meyers was essentially requesting to return to the exact environment where the alleged offenses were committed, and emphasized the sheer number of alleged victims and offenses, the sophistication and planning required to execute the scheme, and Meyers' undeterred behavior in the face of natural deterrents—specifically, his reopening of the accounts after they were shut down and his forwarding of nude photographs to a victim's sister after that victim stopped complying with his demands. **See id.** at 10-11. The court further noted that Meyers' proximity to victims and children in the community, combined with his access to significant financial resources—including a truck for his personal use, a prepaid credit card, \$3,000 in his bank account, and a family with substantial wealth—continued to raise both flight and community safety concerns. **See id.** at 11. The trial court acknowledged Meyers' strengths—specifically, his academic performance, lack of prior criminal record, social activity, stable upbringing, and strong family support—but found that these actually aggravated its concerns about compliance,

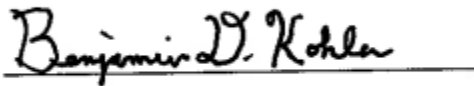
supervision, and flight risk. **See id.** The court reasoned that these very qualities had enabled the sophisticated deception and manipulation employed by Meyers. **See id.** The court faulted defense counsel for failing to provide case citations supporting the viability of internet prohibitions and failing to provide further information regarding Net Nanny's effectiveness. **See id.** at 12. The trial court concluded that the defense had proposed a return home with counseling and internet prohibitions, but had offered no workable means of execution. In the trial court's view, no set of conditions could reasonably assure the safety of any person and the community. **See id.** Accordingly, the trial court requests that this Court affirm its decision to deny the motion for bail modification, or in the alternative, set forth specific conditions sufficiently addressing the concerns regarding flight and community safety. **See id.**

Based upon our review of the record in the light most favorable to the Commonwealth, as the prevailing party, we discern no abuse of discretion by the trial court in denying Meyers' motion to modify bail. The record confirms that the trial court considered multiple factors consistent with **Talley** and, as a result, determined that Meyers presents a danger not only to the twenty-one victims, but also to numerous other members of the community, which cannot be abated using any available bail conditions. **See** Trial Court Statement, 8/14/26, at 11. In particular, the trial court explained that, if permitted to return home on bail, Meyers would be in proximity to victims and

children in the community, and he would have access to significant financial resources—including a truck, a prepaid credit card, \$3,000 in cash, and a family with substantial wealth. ***See id.*** As the record amply supports the trial court’s determination that Meyers’ release on bail would present significant community safety concerns as well as a flight risk, we decline to disturb it. Accordingly, in light of our deferential standard of review, and ***N.E.M.***’s mandate that we consider petitions for specialized review on their merits, we affirm the trial court’s order denying Meyer’s motion to modify bail.

Order affirmed.

Judgment Entered.

A handwritten signature in black ink, reading "Benjamin D. Kohler", is written over a horizontal line.

Benjamin D. Kohler, Esq.
Prothonotary

DATE: 09/29/2026