



☐ CIRCUIT COURT ☒ DISTRICT COURT OF MARYLAND FOR Baltimore County (CC) ☐

Located at 401 Bosley Avenue Towson, MD 21204

Court Address

Telephone 410-887-2601

Case No. _____

NOTE: Respondent will be served a copy of this completed document. Petitioner does not need to give an address if doing so risks further harm, further abuse, or reveals the confidential address of a shelter. If this the case check here ☐.
If you need additional paper, ask the clerk.

Fill in the following, checking the appropriate boxes.

Jeffrey Reichert

Petitioner

3812 Bruce Road

Address

Chesapeake, Virginia 23321

City, State, Zip

vs.

Sarah Hornbeck

Respondent

3735 Clarks Point Road

Address

Middle River, Maryland 21221

City, State, Zip

Home Telephone No. _____

Work Telephone No. _____

Home Telephone No. _____

Work Telephone No. _____

☐ Petition filed electronically under FL § 4-505.1

PETITION FOR PROTECTION FROM

☐ DOMESTIC VIOLENCE ☒ CHILD ABUSE ☐ VULNERABLE ADULT ABUSE
 (Family Law § 4-504)

1. I am ☒ the current or former spouse of the respondent; ☐ a cohabitant of the respondent; ☐ a person related to the respondent by blood, marriage, or adoption; ☒ a parent, stepparent, child, or stepchild of the respondent or the person eligible for relief who resides or resided with the respondent or person eligible for relief for at least 90 days within one (1) year before the filing of the petition; ☐ a vulnerable adult; ☒ an individual who has a child in common with the respondent; ☐ an individual who has had a sexual relationship with the respondent within one (1) year before the filing of the petition; or ☐ an individual who alleges that within six (6) months before the filing of the petition the respondent committed rape or a sexual offense or attempted rape or sexual offense against the individual.

2. I want relief for ☐ myself ☒ minor child ☐ vulnerable adult, from abuse by Sarah Hornbeck

The respondent, whose present whereabouts (if known) are 3735 Clarks Point Rd, Middle River, MD 21220

committed the following acts of abuse against Minor Child, Grant Reichert, date of birth 11/07/2009

on or about, May 2023 to present (check all that apply) ☐ kicking ☐ punching ☐ choking/strangling

☐ slapping ☐ shooting ☐ rape or other sexual offense (or attempt) ☐ hitting with object ☐ stabbing ☐ shoving

☒ threats of violence ☒ mental injury of a child ☒ detaining against will ☐ stalking ☐ biting ☐ revenge porn

☒ other -SEE BELOW AND CONTINUATION SHEET-

The details of what happened are: The Respondent has engaged in mental abuse of the Minor Child. She has threatened violence against him, and forced him out of the state of Maryland against his will. The Respondent has taken the Minor Child's cellphone without informing the Petitioner, and is the only means of communication. The Petitioner has no way of contacting the Minor Child to ensure his safety. - SEE CONTINUATION SHEET -

3. (If the victim is a child or vulnerable adult, fill in the following): I am asking for protection for a ☒ child ☐ vulnerable adult whose name is Grant Reichert

At this time the victim can be found at 3735 Clarks Point Rd, Middle River, MD 21220

I am ☐ State's Attorney ☐ DSS ☒ a relative ☐ an adult living in the home.

4. The person(s) I want protected are (include yourself if you are a victim):

Name(s)	Birthdate	Relationship to Respondent
Grant Reichert	11/07/2009	Son

Case No. _____

Jeffrey Reichert

Petitioner

vs. Sarah Hornbeck

Respondent

5. The person(s) I want protected now lives, or has lived, with the respondent for the following period of time during the past year: Full time, Sunday-Sunday. The Respondent has primary physical custody.

There ☒ are ☐ are not additional persons living in the home.

6. I know of the following court cases involving me, or the person I want protected, and the respondent. (examples include: paternity, child support, divorce, custody, domestic violence, juvenile cases, criminal cases).

Court	Kind of Case	Year Filed	Result or Status (if you know)
<u>Baltimore County CC</u>	<u>Custody Modification</u>	<u>2023</u>	<u>Pending Answer from opposing party.</u>
<u>Anne Arundel CC</u>	<u>Custody Modification</u>	<u>2020</u>	<u>Closed.</u>
<u>Baltimore City CC</u>	<u>Divorce and Custody</u>	<u>2019</u>	<u>Closed.</u>

7. I have received a Final Protective Order against the same respondent that expired within one (1) year of the abuse alleged in this petition, and which was issued for a period of at least six (6) months.

☐ Date issued

☐ Date expired

☐ Location where issued

City/County/State

8. Describe all past injuries the respondent has caused the victim, and give date, if known Primarily mental abuse.
In InThe Respondent has neglected the Minor Child in the past by leaving him in a hotel room while passed out from drinking. There was a FPO granted against her, as well as another FPO before that in August 2010.
The Respondent has physically assaulted and allowed others to physically assault the Minor Child.

9. The respondent owns or has access to the following firearms: The Respondent's significant other, John Michel, owns firearms and leaves them accessible to himself, the Respondent, and Minor Child in the Respondent's home where the Minor Child primarily resides.

10. I want the court to order the respondent: (**NOTE: Petitioner need not give an address if doing so risks further abuse**)

☒ NOT to abuse or threaten to abuse Grant Reichert

Name(s)

☒ NOT to contact, attempt to contact, or harass Grant Reichert

Name(s)

☒ NOT to go to the residence(s) at 3812 Bruce Road, Chesapeake, VA 23321

Address

☒ NOT to go to the school(s) at Arundel Christian School, 7459 Candlewood Road Hanover, MD 21076

Name of school and address

☐ NOT to go to the child care provider(s)

Name of child care provider and address

☐ NOT to go to the work place(s) at

Name(s)

Case No. _____

Jeffrey Reichert vs. Sarah Hornbeck
Petitioner Respondent

☐ to leave the home at _____
Address
and give possession of the home to _____

The name(s) on the deed or lease are: _____

☐ to turn over firearm(s) to a law enforcement agency.

☒ to go to counseling for ☒ domestic violence ☒ drug/alcohol ☐ other

☐ to pay money as Emergency Family Maintenance (*may be taken from respondent's paycheck*).

11. I also want the court to order:

☒ custody of Grant Reichert
Name(s) of child(ren)

be granted to Jeffrey Reichert
Name

☐ use and possession of the following jointly-owned vehicle be awarded to _____
Name

Description of vehicle

☐ temporary possession of the pet(s) _____
Name and description

be awarded to _____
Name

☐ in the final order, the following additional relief necessary to protect _____
Person eligible for relief

from abuse: _____

12. (*Fill in only if you are seeking Emergency Family Maintenance.*) The **respondent** has the following financial resources:

Income from employment in the amount of \$ _____ every ☐ week ☐ 2 weeks ☐ month

☐ other _____

Source of employment income _____
Name and address of source and amount(s) received

Income from other source _____
Name and address of source and amount(s) received

The **respondent** also owns the following property of value: Automobile(s) \$ _____

Home \$ _____ Estimated value

Bank Account(s) \$ _____ Estimated value

Other: _____

I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

Date Petitioner

☐ I have filled in the Addendum (Description of Respondent), **CC-DC-DV-001A**

NOTE

If you believe that you have been a victim of abuse and that there is a danger of serious and immediate injury to you, you may request the assistance of a police officer or local law enforcement agency.

The law enforcement officer must protect you from harm when responding to your request for assistance and may, if you ask, accompany you to the family home so that you may remove clothing and medicine, medical devices, and other personal effects required for you and your children, regardless of who paid for them.

You are entitled to request that the address and telephone number of a victim, a complainant, or a witness be considered for shielding at the filing of this application.

NOTICE TO CUSTODIAN: A person who places in a judicial record identifying information relating to a witness shall give the custodian written or electronic notice that such information is included in the record, where in the record that information is contained, and whether that information is not subject to remote access under this Rule, Rule 1-322.1, Rule 20-201, or other applicable law. Except as federal law may otherwise provide, in the absence of such notice a custodian is not liable for allowing remote access to the information.

☐ Mark this box if this form contains Restricted Information.



DISTRICT COURT OF MARYLAND FOR Baltimore County - Essex



Located at 8914 Kelso Drive, Essex, MD 21221-3121
Court Address

City/County
Telephone 410-887-2601

Case No. _____

NOTE: Respondent will be served a copy of this completed document. Petitioner does not need to give an address if doing so risks further harm.

Sarah Hornbeck

Respondent's Name

**PETITION FOR PROTECTION/PEACE ORDER
CONTINUATION SHEET**

Page 01 of 02

MDEC counties only: If this submission contains Restricted Information (confidential by statute, rule or court order) you must file a Notice Regarding Restricted Information Pursuant to Rule 20-201.1 (form MDJ-008) with this submission and check the Restricted Information box on this form.

The Respondent has a history of absconding the state of Maryland with the Minor Child without informing the Petitioner.

The Respondent has given the Minor Child an ultimatum of going to Sheppard Pratt or Maine for the summer of 2023.

The Respondent allows her significant other, John Michel, to violently discipline the Minor Child. The Respondent also allows other family members to physically discipline the Minor Child. The Minor Child's maternal grandfather has physically assaulted the Minor Child. The Minor Child has a history of experiencing suicidal thoughts, and has been court-ordered to attend therapy by Responent. The Respondent has failed to enroll the Minor Child in any therapy, which likely further exacerbates the Minor Child's mental stature and risks the reoccurrence of suicidal thoughts.

The Minor Child has recently expressed to the Petitioner his fear of the Respondent given her recent return to her poor drinking habits. The Minor Child, in the past, has shared similar concerns with authorities such as CPS and counselors at his school, but to no avail. The only individual the Minor Child has to confide in is the Petitioner, and without access or ability to communicate with the Petitioner because of the Respondent's taking his cellphone is concerning. The Petitioner has no idea how the Minor Child is doing and what concerns he currently has regarding the Respondent's mistreatment.

The Minor Child has stated that he fears the Respondent and her unpredictable behaviors. The Minor Child has not been a participating member of society as the Respondent has shielded him from the same and prevented him from engaging in healthy socialife. The Respondent is responsible for enrolling Minor Child into sporting activities, but has failed to do so, resulting in the Minor Child's significant and unhealthy increase in weight over the past few months. The Respondent has ignored any and all messages from the Petitioner (See Exhibit 1 - OFW Messages). There is an immediate risk that the Respondent is creating imminent harm upon the Minor Child.

Date

Petitioner's Signature

☐ Mark this box if this form contains Restricted Information.



DISTRICT COURT OF MARYLAND FOR Baltimore County - Essex

Located at 8914 Kelso Drive, Essex, MD 21221-3121
Court Address

City/County

Telephone (410) 512-2300

Case No. _____

NOTE: Respondent will be served a copy of this completed document. Petitioner does not need to give an address if doing so risks further harm.

Sarah Hornbeck

Respondent's Name

**PETITION FOR PROTECTION/PEACE ORDER
CONTINUATION SHEET**

Page 02 of 02

MDEC counties only: If this submission contains Restricted Information (confidential by statute, rule or court order) you must file a Notice Regarding Restricted Information Pursuant to Rule 20-201.1 (form MDJ-008) with this submission and check the Restricted Information box on this form.

To note, the cellphone calls and access are mandatory, as they are court ordered. As for the Respondent's drinking habits

- the Respondent is a recovering alcoholic and should not be drinking at all, let alone in the presence of the Minor Child.

And this is especially so given the Minor Child's past trauma involving the Respondent's drinking. The Petitioner is not

able to contact the school, considering the Respondent has misinformed the school about his relationship with the Minor

Child. Both the Respondent and her significant other leave the home on weekends for the entire day, leaving the Minor

Child behind and alone to fend for himself. The Respondent is telling the Minor Child that "he is not allowed to see his

father", and this is incorrect. The Respondent has refused to respond to any correspondence from the Petitioner re:

his access to the Minor Child. The Respondent has continually alienated the Petitioner, which will inevitably create har

upon the Minor Child. The Petitioner has been cut off from all access, including medical access, so there are no updates

pertaining to the health of the Minor Child and his progress, if any at all, with therapy.

Mr. Michel, the Respondent's significant other, regularly abuses alcohol, as well. in front of the Minor Child and yells at

him.

Date

Petitioner's Signature

EXHIBIT 1

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/02/2023 at 07:02 AM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: 10/24/2023 at 09:56 AM*)
Kelsey Diamond
Subject: Visitation

Sarah- you have not opened a single email (8) from me since August 14- or better said, since Grant has been back in Maryland and your attempts to put me in prison failed.

I have not seen Grant in OVER A YEAR. It's ironic that you made this whole lie up and ruined lives- including your own son's- because you were "alienated" from Grant. Hmm. Did you ever go over a year without seeing him? By my calculations, you never went more than 5 at the most. You also could have seen him any time you wanted to. You could call him any time you wanted to. You were given full access to his schools, his therapy and his medical providers.

What do you call what you are doing to him now? It's beyond your definition of "alienation". It's abduction. There are too many examples of Contempt and abuse to list, and I have already done that in previous unopened emails. I have filed for Modification of Custody.

It's impossible for me to schedule visitation because you won't open an email. I can't coordinate my mom flying up here or even one of your strangers to supervise. Therefore, I am telling you that I am coming up to see Grant this weekend. You are supposed to open and respond to my emails in 48 hours. The clock is ticking.

-Good luck

-Jeff

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/04/2023 at 06:04 AM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: 10/24/2023 at 09:56 AM*)
Kelsey Diamond
Subject: Lies

Sarah- you continue to blatantly lie to Grant. You have told him that the Order states that I am not allowed to see him at all- even for supervised visitation. This is a total lie.

I have emailed you 9 times now going back to August 14- when Grant was still in Maine. Since he has been back in Maryland, you have not opened a single email from me. Per the Order, you are required to respond within 48 hours. I am trying to see my son for the first time in over a year. You are intentionally preventing that.

Grant is not in therapy.

Grant is not playing sports.

I have filed a Modification of Custody and we are going to start this whole process over again because you continue to lie and try to support this insane narrative you have created.

You (and others) will also be getting served with a Federal lawsuit shortly.

What is your agenda/end game here Sarah? We all know it was to try to ruin me and put me in prison and had nothing to do with Grant. That failed this summer. What are you doing to Grant? Why are you doing this to him?

Good luck-

-Jeff

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/05/2023 at 10:54 AM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: 10/24/2023 at 09:56 AM*)
Kelsey Diamond
Subject: Visitation- This Weekend

Sarah- you did not open up my last message within 48 hours as required by the Order. I am coming up for visitation this weekend and need to coordinate it with you. This is now 48 hours before visitation on Saturday. If I don't hear from you (Contempt) I will be forced to make arrangements with Grant.

Good Luck-

-Jeff

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/13/2023 at 11:15 AM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: 10/24/2023 at 09:56 AM*)
Kelsey Diamond
Subject: This Weekend

Sarah- I would like to see Grant this weekend. He tells me that you are telling him that the Order states I am not allowed to see him. That is not true. You are just avoiding the Order entirely. You have not opened a single email from me since August 14. You have not given me a single update about Grant- even keeping his health status from me. Grant is not in court-ordered weekly therapy- nor has he ever been. He is not playing sports. He is not happy or healthy.

Are you proud of yourself? Do you consider yourself a good parent? Person?

Good luck-

Jeff

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/18/2023 at 12:56 PM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: 10/24/2023 at 09:56 AM*)
Kelsey Diamond
Subject: Visitation- This Weekend

Sarah- I am again attempting to set up visitation this weekend. You have not opened the last 10 emails I have sent since August 14. I did not even talk to Grant for over 2 months before that. You have actually alienated Grant from me, as opposed to what you claim I did to you. I have not seen him in 13 months.

He is miserable and wants to come home. What are you doing to him? Why are you doing this to him?

Good luck-

Jeff

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/30/2023 at 05:09 PM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: Never*)
Kelsey Diamond
Subject: Phone Calls

Sarah- I have received the email you sent today to Grant's Nana. You won't respond to the 12 emails from me that you avoided opening since August 14. But you enail Nana a bunch of lies. Your accusations are more projections and prove how sick you are. We have followed the Order exactly. If you don't like how Grant speaks to you- CHANGE YOUR BEHAVIOR AND BE A PARENT. You have had him illegally for 3 years with me having little to no access to him. He has known you his whole life. He is 14. Saying that I am telling him to say things just proves how clueless you are as a parent. Accusing Nana of bold face lies proves how sick you are. She hasn't seen her grandson in over 3 years because of you. Now you accuse her of lies and attack her?

She has heard every word spoken between Grant and I. She follows the Order even though she thinks it's complete b.s.- as we all know it is. But she doesn't violate it. You do endlessly. You are not allowed to take Grant's phone. Period. That includes using threats to not talk to me as discipline. You are making it worse for yourself.

We expect to speak to Grant tonight at 6pm. If we don't- good luck.

-Jeff

Message Report



Generated: 11/01/2023 at 07:01 AM by Kelsey Diamond

Number of messages: 1

Timezone: America/New_York

Parents: N/A

Child(ren): N/A

Third Party: N/A

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 10/31/2023 at 12:22 PM
From: Jeff Reichert
To: Sarah Hornbeck (*First Viewed: Never*)
Kelsey Diamond
Subject: October 31, 2023

Sarah- it seems that you think it's OK to email my mom about Grant. She is not his parent. She is not party to the Order. You have 12+ emails here to respond to.

You can not make unilateral custody decisions that change our current order. You are a lawyer...you should know that. You can't decide that you don't like my mom as a supervisor and appoint someone who is a defendant in an upcoming lawsuit I am filing. A co-defendant to you and your entire corrupt posse...I might add. You must get the Order modified by the court. You are not the court.

Furthermore, you have been served with a Modification of Custody in Baltimore County. I am told that Mr. McCarthy is not representing you. Maybe ask your new lawyer if you're allowed to do what you just did? Or, better yet, ask the judge in Baltimore County.

You have no proof of any violations of the Order...because we have not violated it. You have.

I expect to speak to Grant this evening. If I do not, add it to the many violations and instances of abuse you have already compiled. It's your choice.

-Good luck

-Jeff