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MARYLAND:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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JEFFREY W. REICHERT,

:

Plaintiff,

: Civil Action No.

vs.

: 1:24-cv-01865-JMC

SARAH HORNBECK,

:

Defendant.

:

-----X

Friday, February 27, 2026

Accokeek, Maryland 20607-3487

The Zoom Telephonic deposition of SARAH HORNBECK, Defendant, was called for examination by counsel for the Plaintiff, pursuant to notice, conducted remotely and virtually, using audio conference technology, before Sharon L. Banks, C. R., a notary public in and for the State of Maryland, commencing at 10:00 o'clock, a.m., when were present on behalf of the respective parties.

A P P E A R A N C E S

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FOR THE PLAINTIFF:

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&

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FOR THE DEFENDANT:

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I N D E X

WITNESS: MR. REYES: MR. MCCARTHY:

Sarah Hornbeck 4/141 134

E X H I B I T S

Plaintiff's Exhibit 1, pg. 47, 7-10-20, Petition for
Protective Order

Plaintiff's Exhibit 2, pg. 67, 7-14-2020, Statement of
Charges

Plaintiff's Exhibit 3, pg. 82, 7-25-2020, Application
for Statement of Charges

Plaintiff's Exhibit 4, pg. 82, 7-25-2020, Criminal
Summons on Charging Document

Plaintiff's Exhibit 5, pg. 85, 8-8-2020, Criminal
Summons on Charging Document

Plaintiff's Exhibit 6, pg. 95, 8-18-2020, Arrest Warrant

Plaintiff's Exhibit 7, pg. 101, 8-17-2020, 1 pg. E-mail

Plaintiff's Exhibit 8, pg. 102, 8-22-2020, Arrest
Warrant

Plaintiff's Exhibit 9, pg. 128, Sarah Hornbeck Affidavit

P R O C E E D I N G S

1
2 Whereupon,

3 SARAH HORNBECK,

4 Was called for examination by counsel for the Plaintiff
5 and after having been first duly sworn, by the Notary
6 Public, was examined and testified as follows:

7 DIRECT EXAMINATION:

8 BY MR. REYES:

9 Q Good Morning. This is Ibrahim Reyes. I am
10 the attorney for Jeff Reichert. I am accompanied by
11 Tonya Sweat, my Co-Counsel. Thank you for appearing for
12 your deposition, Ms. Hornbeck. And I will be asking you
13 some questions related to this case; alright.

14 A Al right.

15 Q What is your full name?

16 A Sarah Hornbeck, S-A-R-A-H, H-O-R-N-B-E-C-K.

17 Q What is your date of birth?

18 A 7-13-74.

19 Q What is your current address?

20 A 3735 Clarks Point Road, Middle River,
21 Maryland 21220.

1 Q Where are you giving this deposition from?

2 A My home.

3 Q Are you alone?

4 A I am in my home office, yes.

5 Q Are you alone?

6 A Am I alone in my home office? Yes.

7 Q Are you under the influence of any
8 substances, whether they are drugs or alcohol at this
9 time?

10 A No.

11 Q Anything that may impair your testimony
12 today?

13 A No.

14 Q Would you give us the benefit of your
15 educational background, Ms. Hornbeck? High School
16 forward?

17 A High School, college, law school.

18 Q Sure. Where did you go to high school?

19 A I went to high school at Mt. Ararat High
20 School in Topsham, Maine.

21 Q When did you graduate?

1 A 1992.

2 Q And then you attended college immediately?

3 A Yes.

4 Q Where did you go?

5 A Um, I first attended college in Connecticut
6 and eventually transferred to Washington College in
7 Chestertown, Maryland where I graduated in 1997.

8 Q And you graduated with a degree in what?

9 A Bachelor's degree in Economics with a Minor
10 in Business.

11 Q And following that, you attended law school?

12 A Correct. I worked for a bit and I attended
13 law school thereafter; yes.

14 Q Okay. What law school did you attend?

15 A I attended the University of Baltimore Law
16 School in Baltimore, Maryland.

17 Q Okay. When did you graduate from law school?

18 A I graduated from law school in 2003.

19 Q When did you take the Bar?

20 A I took the Bar in, I believe, the Summer of
21 2003 and again the following Winter in 2004.

1 Q So you took the Bar, two or three times;
2 sorry?

3 A Two times.

4 Q Two times; okay.

5 And you have been a lawyer since?

6 A I have had a law degree and been a member of
7 the Maryland Bar since 2004; yes.

8 Q Okay. Thank you.

9 Were you previously married to Jeffrey Reichert?

10 A Yes.

11 Q On what date were you married to Jeffrey
12 Reichert?

13 A I believe we got married on January 31st of
14 2009, 30th or 31st; my apologies.

15 Q Okay. When were you... and you eventually
16 divorced Jeff - - Jeff Reichert and you were eventually
17 divorced; correct?

18 A Correct.

19 Q On... do you know the date of that judgement
20 of absolute divorce?

21 A I believe that was December of 2011.

1 Q You had a child with Jeffrey Reichert?

2 A Yes.

3 Q What is the child's name?

4 A I am going to use his initials; please.

5 Q That's okay with me.

6 A Yes.

7 Q So his initials are?

8 A G.R.

9 Q What is his current age?

10 A Sixteen.

11 Q What is his date of birth?

12 A 11-7-09.

13 Q Thank you.

14 Would you please describe, for us, the custody
15 arrangement that was established by the October 9, 2011
16 judgement of absolute divorce that was entered in the
17 Circuit Court of Baltimore City?

18 MR. MCCARTHY: Counsel, I will note at this
19 time that the court entered ECF document 85 filed
20 12-10-2026, (Sic). Um, the scope of this deposition...
21 so I mean if this is to relitigate the family law case

1 or anything that has been relitigated, I would put an
2 objection on the record to that. Is there any way that
3 this is relevant to the instant case?

4 MR. REYES: It is.

5 MR. MCCARTHY: How?

6 MR. REYES: I need to understand the
7 background of Jeffrey Reichert and Sarah Hornbeck and
8 how it affects her filing of all these documents that we
9 are in litigation about. And that is exactly what the
10 court ordered - -

11 MR. MCCARTHY: Sort of.

12 MR. REYES: - - says the Plaintiff may ask
13 the Defendant questions related to the claims underlined
14 in this action to the extent that they are pled in the
15 complaint and are answered and bear on the stated
16 reasons referenced above. Well, there - -

17 MR. MCCARTHY: I place my objection - - I
18 will place my objection on the record, Counselor.
19 Objection to relevance and based on the court's document
20 85 filed 12-10-26 by the court regarding the scope of
21 the deposition. And Ms. Hornbeck, you may go ahead and

1 answer.

2 THE WITNESS: Mr. Reyes, would you please
3 repeat the question.

4 BY MR. REYES:

5 Q Please describe the custody arrangement
6 established by the October 9, 2011 judgement of absolute
7 divorce entered in the Circuit Court of Baltimore City?

8 A I don't believe that date is correct.

9 Q When do you think the absolute divorce
10 judgement was entered?

11 A As I previously stated, I believe it was
12 December of 2011.

13 Q Okay. Would you please describe the custody
14 arrangements established by that order whether it was
15 entered in October of in December?

16 A A shared custody.

17 Q And what did that entail? What did that
18 entail, Ms. Hornbeck?

19 A Shared custody? I... apologies.

20 Q Yes. Would you describe it?

21 A The schedule?

1 Q In general terms.

2 A If I recall correctly, the original custody
3 schedule was Mr. Reichert and I share custody of our
4 minor child on a 5/2/2/5 schedule whereby we had equal
5 shared physical time and we shared legal custody with the
6 Court appointing me as tie breaker of legal custody
7 decisions in the event we could not reach an agreement.
8 Those are the main terms of the custody arrangement from
9 I believe the 2011 court order.

10 Q Okay. Around May of 2015, did you enter into
11 a written agreement with Jeffrey Reichert regarding your
12 relocation to Anne Arundel County?

13 MR. MCCARTHY: Objection.

14 THE WITNESS: I don't recall.

15 MR. MCCARTHY: Objection, Counsel. But
16 yeah, go ahead an answer.

17 THE WITNESS: Around 2015 - -

18 BY MR. REYES:

19 Q Around May of 2015, it's my understanding,
20 Ms. Hornbeck that you entered into a written agreement
21 with Jeff Reichert regarding your relocation to Anne

1 Arundel County.

2 A No. That is not - -

3 MR. MCCARTHY: Objection to the extent - -

4 BY MR. REYES:

5 Q So what is your answer?

6 A No.

7 Q You did not enter into a written agreement

8 with Mr. Reichert regarding your relocation to Anne

9 Arundel County?

10 A That is correct.

11 Q In May of 2015 or in 2015 or at any time?

12 A That's correct. We did not enter into an
13 agreement. We discussed certain issues and never reached
14 an agreement; correct.

15 Q What issues did you discuss?

16 A We discussed our minor child, um, I don't
17 recall exactly what else.

18 Q Did you discuss child support payments?

19 A I don't recall.

20 Q So you don't recall the terms of the
21 agreement?

1 A There was no agreement.

2 Q Not oral and not in writing? There was no
3 agreement of any kind?

4 A Correct.

5 Q Did you file a motion to modify custody in
6 the Circuit Court for Baltimore City to relocate with
7 G.R. to Maine in November of 2015?

8 A No.

9 Q In May of 2016, did you relocate with G.R. to
10 Maine for the Summer?

11 A No.

12 Q Where were you in the Summer of 2016?

13 A I was, to the best of my recollection, either
14 in Maryland where I reside or perhaps visiting Maine.

15 Q For how long did you visit Maine?

16 A I don't recall.

17 Q Was it for a day? Was it for a week? Was it
18 for two weeks? Was it for a month? Was it for two
19 months? I just need an understanding.

20 A I don't recall. It was likely to the best of
21 my recollection, a few weeks and perhaps a couple weeks

1 on more than one occasion, but I don't recall exactly.

2 Q Did you have Jeffrey Reichert's consent or
3 the court's approval to do so?

4 A Excuse me? I am sorry. Can you repeat the
5 question? Did I have Mr. Reichert's consent to what?

6 Q Did you have Mr. Reichert's consent to take
7 Grant to Maine for a part of the Summer of 2016?

8 A I don't recall - -

9 MR. MCCARTHY: Objection to the extent that
10 this is completely... Ms. Hornbeck, hold on.

11 Objection to the extent Counsel that this line of
12 questioning is absurd.

13 MR. REYES: Thank you.

14 MR. MCCARTHY: It is completely irrelevant
15 to the current case. We are relitigating the family law
16 case, which is of course what Mr. Reichert wants to do.
17 But go ahead and answer, Ms. Hornbeck.

18 THE WITNESS: Um, I don't recall if I would
19 have been required to ask Mr. Reichert to visit Maine, I
20 don't recall exactly the details of that timeframe. I am
21 confident we did visit Maine during that time though.

1 BY MR. REYES:

2 Q But you are not confident that you had Mr.
3 Reichert's consent or court approval to do so; correct?

4 A I don't know.

5 Q In March of 2018, were you arrested and
6 charged with driving under the influence, assault on a
7 law enforcement officer and related offenses in Charles
8 County, Maryland?

9 MR. MCCARTHY: Objection. Go ahead and
10 answer.

11 THE WITNESS: Yes.

12 BY MR. REYES:

13 Q Did that arrest stem from a drug and alcohol
14 incident?

15 MR. MCCARTHY: Same objection. Go ahead and
16 answer.

17 THE WITNESS: Yes.

18 BY MR. REYES:

19 Q What was the outcome of those charges?

20 A PVJ and I believe one year of unsupervised
21 probation.

1 Q Please say what is PVJ?

2 A Probation before judgement.

3 Q Were you placed on a two year probation that
4 ended in August of 2020?

5 A I don't recall.

6 Q In our lawsuit, we pled on.. at paragraph 16
7 that in March of 2018 Defendant Hornbeck was arrested and
8 charged with among other things, driving while under the
9 influence, assaulting an officer and other charges
10 stemming from a drug and alcohol incident in Charles
11 County, Maryland. Is that accurate?

12 A I believe so.

13 Q I follow on that same paragraph 16, we
14 further pled that the result of the subsequent criminal
15 proceedings initiated against Defendant Hornbeck lead to
16 her being placed on probation for two years, ending in
17 August of 2020. Is that accurate?

18 A I would need to review the documents, but
19 yes, that sounds approximately correct.

20 Q Okay. Thank you.

21 In your answer to their complaint, to paragraph 16,

1 you deny those allegations. Do you know why you denied
2 those allegations?

3 A I don't recall.

4 Q Will you please describe any ongoing custody
5 disputes or enforcement efforts between you and Mr.
6 Reichert between 2018 through July of 2020?

7 MR. MCCARTHY: Objection. Go ahead and
8 answer.

9 THE WITNESS: Custody disputes ongoing and
10 apologies, Mr. Reyes the second part of your question,
11 please repeat.

12 BY MR. REYES:

13 Q Yeah. I asked you to please describe any
14 ongoing disputes or enforcement efforts between you and
15 Mr. Reichert between 2018 and 2020; obviously regarding
16 G.R.?

17 A Disputes, yes and enforcement, I am not sure
18 how to answer.

19 Q Why don't you describe those custody disputes
20 between 2018 and July, 2020?

21 A I don't recall exactly. I am confident Mr.

1 Reichert and I appeared in court to address custody
2 disputes.

3 Q Between 2018 and July, 2020?

4 A I believe so, but that's the best of my
5 recollection; I believe.

6 Q In your answers to interrogatories, in
7 interrogatory number 10, you answered that you contacted
8 law enforcement multiple times between July the 1st and
9 September 20th of 2020, due to concerns about G.R.'s
10 safety. Do you recall that?

11 A Yes.

12 Q Please identify each instance including
13 dates, the agencies that you contacted and the reasons
14 and the outcomes for these law enforcement encounters?

15 A I don't recall.

16 Q Do you have a memory issue, Ms. Hornbeck?

17 A No.

18 Q Do you know why you do not recall things that
19 are fairly recent?

20 MR. MCCARTHY: Objection to being, "fairly
21 recent." Counsel, we are talking over six years ago,

1 and probably three dozen cases from Mr. Reichert.

2 MR. REYES: Mr. McCarthy, if I ever want to
3 take your deposition, I will notice you, but I - -

4 MR. MCCARTHY: Counsel, Counsel, if I want
5 to be a potted plant, I will be one. I am here to
6 represent my client, who has been a victim of this
7 individual. You are deposing a woman who has been the
8 victim of domestic violence and is subjected to a
9 campaign of terror by this individual - -

10 MR. REYES: No speaking objections. If you
11 have an objection to form - -

12 MR. MCCARTHY: Yeah. I will put this
13 objection on the record, Counsel. You are asking
14 questions and she is giving you answers. You are
15 currently just harassing her because you don't like the
16 answers. The reality is saying this is fairly recent,
17 you are - -

18 MR. REYES: There is no pending question.
19 You are wasting my time.

20 MR. MCCARTHY: No, no, no, no, no. I don't
21 care.

1 MR. REYES: Ms. Hornbeck - -

2 MR. MCCARTHY: I don't care - -

3 MR. REYES: In your answers to
4 interrogatories - -

5 MR. MCCARTHY: I am going to finish - - sir,
6 I am going to finish my objection.

7 MR. REYES: You are done.

8 MR. MCCARTHY: No, I am not.

9 MR. REYES: Oh, okay.

10 MR. MCCARTHY: I am not done, Counsel.

11 MR. REYES: Go.

12 MR. MCCARTHY: Thank you. I am going to
13 put it this way, Counsel: If you don't like the answer,
14 that's tough.

15 MR. REYES: That is not an objection. That
16 is not an objection. State your objection.

17 MR. MCCARTHY: If she says she does not
18 recall, I am going to object to the extent that you are
19 harassing the witness; okay. And the fact that you - -
20 most of your questions, so far, have been completely
21 irrelevant to the five - -

1 MR. REYES: You have already objected to
2 that. You have already objected to that. It is on the
3 record.

4 MR. MCCARTHY: - - to the five distinct
5 charges that are subject to Mr. Reichert's complaint.
6 Instead, you are relitigating the family law cases that
7 you lost.

8 MR. REYES: You have already objected - -

9 MR. MCCARTHY: So that is now put on the
10 record... no, no, no, I'm not done.

11 MR. REYES: You are not done?

12 MR. MCCARTHY: No. Don't cut me off.
13 Usually - - I have let you go on this charade. The fact
14 of the matter is, is that you are asking irrelevant
15 questions and trying to relitigate this, which is all
16 Mr. Reichert is trying to do.

17 MR. REYES: You have already objected. That
18 objection is already on the record.

19 MR. MCCARTHY: This is a charade. This is a
20 charade.

21 MR. REYES: It is already on the record.

1 MR. MCCARTHY: I would suggest that you get
2 to something that is actually relevant.

3 BY MR. REYES:

4 Q Ms. Hornbeck, in your answers to
5 interrogatories, at interrogatory number 16, you claim
6 emotional harm from Mr. Reichert's action. Do you recall
7 that?

8 A Yes.

9 Q Please describe any therapy or treatment that
10 you have sought related to this?

11 MR. MCCARTHY: Objection to the extent it
12 seeks mental health records, but go ahead and answer,
13 Ms. Hornbeck.

14 MR. REYES: I am not requesting medical
15 records.

16 MR. MCCARTHY: You are asking - -

17 MR. REYES: It is a deposition.

18 MR. MCCARTHY: - - you are asking for
19 psychological treatment, which is clearly confidential
20 under Maryland law, sir. You may want to review it.
21 But go ahead and answer, Ms. Hornbeck.

1 THE WITNESS: Yes. I did see a therapist
2 because of Mr. Reichert's abuse, which began years ago
3 and continues to this day.

4 BY MR. REYES:

5 Q Okay. Who did you see? What is the name of
6 the therapist?

7 A Um, one therapist is Rosalie, R-O-S-A-L-I-E,
8 McCabe, M-C-C-A-B-E. And if I spoke to other... any
9 other, any other therapists, I don't exactly recall. Ms.
10 McCabe was my primary therapist, due to Mr. Reichert's
11 abuse, which began years ago and continues.

12 Mr. Reichert is an abuser of both me and my child
13 and others. He has been found by the courts to be
14 abusive on both me and my son - -

15 Q My question, Ms. Hornbeck was whether - -

16 MR. MCCARTHY: No. Let her finish. Go
17 ahead, Ms. Hornbeck.

18 MR. REYES: No. She did answer the question
19 that I posed.

20 MR. MCCARTHY: No, no, no, no. She did not
21 finish her answer, Counsel.

1 BY MR. REYES:

2 Q So you claim emotional harm - -

3 MR. MCCARTHY: You asked the question - -

4 BY MR. REYES:

5 Q - - for Mr. Reichert's actions and you have
6 described... why don't you describe that emotional harm,
7 Ms. Hornbeck?

8 A Mr. Reichert is abusive. He has abused me
9 and my son for many, many years. Mr. Reichert has been
10 found by the courts to be abusive of both me and my son.

11 Q Ms. Hornbeck, my question, my question is to
12 please describe the emotional harm?

13 MR. MCCARTHY: No, finish your answer, Ms.
14 Hornbeck. Thank you.

15 MR. REYES: She is not answering the
16 question. She's - -

17 MR. MCCARTHY: She is.

18 MR. REYES: It is a dissertation.

19 BY MR. REYES:

20 Q My question is what are - -

21 MR. MCCARTHY: You just cut her off.

1 BY MR. REYES:

2 Q -- what is the emotional harm? So please
3 describe your emotional harm, Ms. Hornbeck?

4 A My emotional harm stemming from Mr.
5 Reichert's abuse has been fairly extensive. It began
6 years ago and I sought therapy to address his harm.

7 Q What is the emotional harm?

8 MR. MCCARTHY: Counsel, are you going to let
9 her finish her answer?

10 MR. REYES: There was a long pause.

11 MR. MCCARTHY: No, there wasn't. You just
12 cut her off, because you don't like the answer, Counsel.

13 Ms. Hornbeck --

14 MR. REYES: You keep saying that I don't
15 like answers. I am here to seek the truth. I don't
16 care what the answer is.

17 MR. MCCARTHY: Please... thank you so much.

18 Ms. Hornbeck, just describe the emotional harm
19 inflicted on you by the abuser, Jeff Reichert.

20 MR. REYES: Objection.

21 THE WITNESS: Of course. Mr. Reichert's

1 emotional abuse, over the years, has caused emotional
2 harm to me at a number of levels, including causing
3 anxiety, including being fearful for my life, including
4 challenges in my day to day during the time that his
5 emotional abuse affected me on a day to day basis.

6 He continues to be abusive to me to this day, but
7 thankfully, I have been removed to the absolute extent
8 possible from any contact or communications with Mr.
9 Reichert, because he is an abusive individual. As I was
10 saying previously, he has a long history of the abuse of
11 me - -

12 BY MR. REYES:

13 Q You have said it before. I understand.

14 A - - of my son and in my opinion and belief
15 after having met Mr. Reichert over 25 years ago, he is an
16 abuser of the vulnerable including the elderly and the...
17 many others.

18 Q Okay. This emotional harm that you are
19 describing, did you disclose that to Ms. McCabe?

20 A Yes. And I will not answer further.

21 Q I am sorry?

1 A Yes. And I --

2 Q Yes?

3 A -- will not answer further.

4 Q Where is Ms. McCabe located?

5 A I don't know.

6 Q Okay. Is she in the State of Maryland?

7 A I don't know.

8 Q Why wouldn't you know?

9 A I have not seen Ms. McCabe for a number of
10 years.

11 Q When did you... when were you Ms. McCabe's
12 patient?

13 A I don't exactly recall; for a number of
14 years. Most recently perhaps, five to seven years ago.

15 Q So the last time that you saw someone for
16 your mental health was about five or seven years ago?

17 A No. That was the last time I saw Ms. McCabe.

18 Q So have you seen other people for your mental
19 health since?

20 A On occasion, yes, as recently as within the
21 past few months to address Mr. Reichert's ongoing abuse I

1 saw one provider one time.

2 Q Who did you see?

3 A A provider through a source called Grow.

4 Q Who did you see?

5 A I believe her name is Michelle Shay, but I am
6 not positive.

7 Q Did you meet her in person or by Zoom?

8 A Not in person. We met by video conference.

9 I don't know if it was Zoom or another on-line platform.

10 Q Okay, but it was by video conference. And
11 this was when?

12 A I believe a couple months ago.

13 Q And her full name is, please?

14 A I believe Michelle Shay.

15 Q Who recommended her?

16 A No one.

17 Q How did you learn about her existence?

18 A I mentioned the website. I believe it is
19 called Grow.com.

20 Q How did you come upon the website?

21 A My primary care physician told me about

1 Grow.com at one point.

2 Q Who is your primary physician?

3 A Jessica Sewell, S-E-W-E-L-L, I believe.

4 Q Where is she? Is she in Maryland?

5 A Yes.

6 Q In what city?

7 A I believe Belcamp, Maryland.

8 Q Okay. And earlier, I was asking you about
9 Ms. McCabe and I believe you said she was in Maryland,
10 but I did not ask you. What city?

11 A During the time I met with Mrs. McCabe, she
12 was in Baltimore, Maryland. She has since retired and I
13 do not know her current location.

14 Q Have you ever sought mental health counseling
15 for reasons other than Jeff Reichert?

16 A My therapy would cover Mr. Reichert's abuse
17 as well as other issues to discuss. I believe after my
18 DUI incident, I did see a different therapist for
19 approximately two or three months. And I do not recall
20 his name.

21 Q Where was he? In what city and what state?

1 A Towson, Maryland.

2 Q And you say he was a man?

3 A Yes.

4 Q Have you been diagnosed with any mental
5 health disorders?

6 MR. MCCARTHY: Go ahead and answer, Ms.
7 Hornbeck, please.

8 THE WITNESS: No.

9 BY MR. REYES:

10 Q You have alleged physical abuse by Mr.
11 Reichert, haven't you?

12 MR. MCCARTHY: Objection. Go ahead and
13 answer.

14 THE WITNESS: I have not been in Mr.
15 Reichert's presence for many, many years.

16 BY MR. REYES:

17 Q How long?

18 A Other than court appearances, probably ten to
19 fifteen years.

20 Q Okay. Prior to July of 2020, had you ever
21 alleged physical abuse by Mr. Reichert? And by that, I

1 mean him putting a gun to your head in any court filing
2 or police report?

3 A Yes.

4 Q When and to who did you make that statement
5 or that complaint?

6 A I don't exactly recall. However to the best
7 of my recollection, that was discussed during our divorce
8 proceedings to court... in court.

9 Q So during your divorce proceedings, in open
10 court, you explained that Mr. Reichert put a gun to your
11 head?

12 A That is correct.

13 Q On or about November of 2015, did you
14 withdraw G.R. from a school that he was attending in
15 Baltimore City and enroll him in a school in Maine?

16 A I did not.

17 Q Did someone do that; not you?

18 A No.

19 Q What school did G.R. attend in November, 2015
20 and December, 2015?

21 A The last time he was enrolled during that

1 time at Thomas Johnson Elementary Middle School, in
2 Baltimore, Maryland. Um, he - - sorry.

3 Q Sorry. I started to speak. My bad.

4 A No. Go right ahead.

5 Q No, you go right ahead. You are answering.
6 You are saying that your son was at this Middle School in
7 November and December of 2015. So please continue.

8 A Correct. He was in kindergarten at the time.

9 Q All right.

10 A He was five years old and Mr. Reichert was in
11 treatment at the time.

12 Q Okay. And you did not remove him from that
13 school? You did not stop his enrollment at that school.
14 Correct?

15 A That is correct.

16 Q And you did not enroll him in another school.
17 Right?

18 A Correct.

19 Q Did someone enroll him in another school?

20 A No.

21 Q Did G.R. finish kindergarten at that school

1 that you just described?

2 A Yes.

3 Q In June of 2019, did you pass out from
4 drinking in a hotel room on the Eastern Shore leaving
5 G.R., who was then 9 and his 3 year old brother
6 unsupervised?

7 MR. MCCARTHY: Objection. Go ahead and
8 answer.

9 THE WITNESS: No.

10 BY MR. REYES:

11 Q That did not happen?

12 A Correct.

13 Q So were you in a hotel room with G.R. and his
14 little brother sometime in June of 2019 on the Eastern
15 Shore?

16 A To the best of my recollection; yes.

17 Q Why? Why were you there?

18 A We were likely on vacation.

19 Q You did not drive while under the influence
20 of alcohol on that trip?

21 A That is correct.

1 Q And you did not pass out from drinking in
2 that hotel room on the Eastern Shore while in the
3 presence of your children? You did not?

4 A Correct.

5 Q Who was your lawyer at the time?

6 A Mr. Brennen McCarthy has represented me for
7 over a decade. And I am so grateful.

8 Q Did you have a lawyer named Steven Cullen
9 (ph) at the time?

10 A No.

11 Q Do you know the name, Steven Cullen?

12 A Yes.

13 Q Who is he?

14 A Mr. Cullen is an attorney.

15 Q Has he been your attorney?

16 A Yes.

17 Q When?

18 A Approximately 2015, prior to Mr. McCarthy's
19 full involvement.

20 Q In this question I just asked you about 2019,
21 Steven Cullen was not involved, but instead Brennan

1 McCarthy was involved as your lawyer?

2 A Correct.

3 Q Okay. Did Jeff Reichert file a petition for
4 a protective order against you in the District Court for
5 Anne Arundel County in July of 2019?

6 A I don't recall. Mr. Reichert has filed
7 numerous protective orders against me, starting in August
8 of 2010 and continuing as recently as, I believe this
9 year. Mr. Reichert has filed so many protective orders
10 against me. In fact, the court has ruled that Mr.
11 Reichert has filled numerous protective orders to avoid
12 custody schedule, and changed the court ordered custody
13 schedule. So I can not answer your question with respect
14 to specific dates or locations where Mr. Reichert has
15 filed his numerous protective orders, but I will say he
16 has filed protective orders against me in Baltimore City,
17 in Anne Arundel County, in Baltimore County and in the
18 State of Virginia that I am aware of. Perhaps more that
19 I am not aware of.

20 Q Okay. In the complaint filed by Mr.
21 Reichert, at paragraph 19, he has pled that on or about

1 August 8, 2019, the circuit court for Baltimore City
2 issued a final protective order in favor of Plaintiff,
3 Plaintiff being Jeffrey Reichert and the final protective
4 order awarded physical and legal custody of G.R. to
5 Plaintiff, Plaintiff being Jeffrey Reichert and it
6 granted you, Ms. Hornbeck, supervised and conditional
7 visitation rights every other weekend and that final
8 protective order was initially effective until February 8
9 of 2020. Do you agree with that statement?

10 A I would refer you to my last answer, please.

11 Q Your last answer doesn't answer my question
12 now. I am asking you if paragraph 19 is accurate? It is
13 specific about a date. It is... the date is August 8,
14 2019 and you answered it.

15 A I stand by my prior answer and my answers in
16 my documents previously provided to you. So - -

17 Q Okay.

18 A Without those documents in front of me, I can
19 not answer further.

20 Q You are free to have all the pleadings in
21 this case with you. You are not precluded from any of

1 that. So you know....

2 A Thank you.

3 Q In October - - sorry.

4 Did you consent to a final consent order modifying
5 custody in October of 2019?

6 MR. MCCARTHY: Objection. Go ahead and
7 answer.

8 THE WITNESS: Yes.

9 BY MR. REYES:

10 Q And under that consent, final consent order,
11 Mr. Reichert had primary, physical and tie breaking
12 authority?

13 A Correct.

14 Q And how did you reach that final consent
15 order? Did you reach it through a mediation process or a
16 different process?

17 A That was reached by our respective attorneys
18 with attorneys representing the parties.

19 Q Okay. And in October of 2019 your attorney
20 would have been Brennan McCarthy?

21 A That's correct. I am so grateful.

1 Q And did that final consent order end the
2 litigation up until then?

3 A Until then?

4 Q Until then.

5 A Apologies, sir. I am not sure I understand
6 your question.

7 Q I am asking you if when Mr. Reichert and
8 yourself entered into a final consent order modifying the
9 custody to joint, legal with him having primary, physical
10 and tie breaking authority, did that final consent order
11 end the prior litigation, the litigation that you were in
12 at that time?

13 A That consent order was issued and was the
14 controlling order at the time, but as we all know, this
15 has been ongoing litigation from the time my son was an
16 infant and continuing to this day and there have been
17 numerous court orders throughout.

18 Q Did the final consent order entered in
19 October, 2019 end the prior litigation?

20 MR. MCCARTHY: The Baltimore City litigation,
21 Ms. Hornbeck; just to your recollection.

1 THE WITNESS: Yes, yes.

2 BY MR. REYES:

3 Q Thank you.

4 In February of 2020, did Mr. Reichert file a motion
5 to extend your... a final protective order after your
6 probation sobriety failures and G.R.'s report of physical
7 abuse by you at a basketball game?

8 MR. MCCARTHY: Objection to that part, but
9 go ahead and answer, Ms. Hornbeck.

10 THE WITNESS: Yes. To the best of my
11 recollection, Mr. Reichert violated the October, 2019
12 final consent agreement in a number of ways, including
13 filing to extend a protective order; yes.

14 BY MR. REYES:

15 Q I did not ask that. What I asked was whether
16 in February of 2020, did Mr. Reichert file to extend the
17 final protective order after your probation sobriety
18 failures and G.R.'s report of physical abuse by you at a
19 basketball game?

20 MR. MCCARTHY: Objection to the extent that
21 is mischaracterizes the protective order, as well as the

1 final order where Ms. Reichert... or Ms. Hornbeck was
2 supposed to do basically goes through an Apple app; um,
3 that I object to the, I guess the scope of the question
4 or the form of the question. But Ms. Hornbeck, go ahead
5 and answer to the extent you know.

6 THE WITNESS: To the extent I know, yes, Mr.
7 Reichert filed to extend the duration of the protective
8 order against me in violation of the final consent
9 agreement. I believe he filed based on, I don't know,
10 but I am confident he filed based on inaccurate and
11 untruthful information and I will say vehemently that
12 his allegations that I physically abused our son ever,
13 including at a basketball game as he claims are
14 completely absurd and untrue.

15 BY MR. REYES:

16 Q Okay. Did you fail sobriety tests in
17 connection with your probation at that time?

18 A I don't recall.

19 Q Why would you not recall something so recent?
20 I am trying to really understand. Ms. Hornbeck?

21 A I said I don't recall.

1 Q On July 9 of 2020, did you file a motion for
2 custody modification in Anne Arundel County Circuit
3 Court?

4 A I don't recall the - -

5 MR. MCCARTHY: Objection. Go ahead and
6 answer.

7 THE WITNESS: Yeah. But yes. But I don't
8 know the dates exactly, but around, around that time;
9 yes.

10 BY MR. REYES:

11 Q Okay. Where did you live at that time?

12 A In Baltimore City.

13 Q You lived in Baltimore City; okay. And - -

14 A Yes.

15 Q Did in the Baltimore City Court require you
16 to go back to that court if you needed to amend anything
17 regarding the order entered in that court?

18 A No.

19 MR. MCCARTHY: Objection, Counsel. We are
20 not relitigating this case; not again. But I mean, go
21 ahead and answer. This is wasting time; go ahead. You

1 answered no.

2 THE WITNESS: No.

3 BY MR. REYES:

4 Q So you were not required to go back to
5 Baltimore City Court regarding the custody of G.R. in
6 July of 2020? Is that your answer?

7 A Correct.

8 Q Okay. In that motion that you filed in Anne
9 Arundel County Circuit Court, on or about July 9 of 2020,
10 did you allege that Mr. Reichert denied you access to
11 G.R.?

12 A Yes.

13 Q Please explain how did he deny you access to
14 G.R. at that time?

15 MR. MCCARTHY: Objection. Go ahead and
16 answer.

17 THE WITNESS: Mr. Reichert did not allow me
18 to see my son pursuant to the custody schedule in the
19 court order.

20 BY MR. REYES:

21 Q Okay. When was that and why?

1 A I don't recall exactly and I don't know.

2 Q Prior to July 10 of 2020, did you call law
3 enforcement at least five times to conduct wellness
4 checks at the house of Jeff Reichert?

5 A I don't recall exactly. I think I already
6 answered that question related to that time frame.

7 Q Do you know why you do not recall so many
8 things that happened in 2020?

9 MR. MCCARTHY: Ms. Hornbeck?

10 THE WITNESS: Oh, I am sorry. Can you
11 repeat the question?

12 BY MR. REYES:

13 Q Do you know why you do not recall so many
14 things that happened in 2020?

15 A I disagree with the characterization of your
16 question.

17 Q That's okay, but my question is: Do you know
18 why you do not recall so many things that happened in
19 2020?

20 A No.

21 Q Do you recall having called law enforcement

1 to conduct wellness checks at Mr. Reichert's in 2020?

2 A Yes.

3 Q What were the reasons for those calls?

4 A Mr. Reichert's history of abuse and neglect
5 of my son and his ongoing substance abuse issues,
6 including drugs and alcohol and my concern for my son
7 during that time.

8 Q Yes, but why did you actually make the call?

9 At the time that you made the call - -

10 MR. MCCARTHY: Objection.

11 BY MR. REYES:

12 Q - - or the calls, what was going on?

13 MR. MCCARTHY: Objection. Go ahead and
14 answer.

15 THE WITNESS: Right. I don't recall exactly
16 when I called a wellness check for my son during that
17 time frame. It would have stemmed from my concern over
18 my son's wellbeing as well as Mr. Reichert not bringing
19 our son pursuant to the court ordered custody schedule.
20 So to the best of my recollection, it is likely a
21 combination of events that may have caused me great

1 concern over the safety and wellbeing of my son while in
2 Mr. Reichert's care, perhaps during that time where I
3 would have called a wellness check to determine his
4 safety.

5 BY MR. REYES:

6 Q Okay. Do you recall the reason why you made
7 the call for a wellness check on Mr. Reichert? I
8 understand that... your answer, his history, but now I am
9 talking specifically on the date that you called law
10 enforcement on a wellness check of your son, what was the
11 reason that you made the call - -

12 A I - -

13 Q - - that day?

14 MR. MCCARTHY: Objection. Go ahead and
15 answer it again.

16 THE WITNESS: I can't answer, because I
17 checked on my son through wellness checks a number of
18 times.

19 BY MR. REYES:

20 Q So you don't know why you made the call?

21 A I would direct you to my prior answer.

1 Q Do you recall the dates when you made those
2 calls?

3 A I do not - -

4 MR. MCCARTHY: Objection; asked and
5 answered. Go ahead and answer.

6 BY MR. REYES:

7 Q Do you recall the outcome of those wellness
8 checks?

9 A Yes.

10 Q Which is?

11 A Um, for a number of wellness checks, officers
12 were able to make contact with my son and reported
13 that... reported to me that he was okay. Um, except for
14 on I believe it was Friday, July 10th, officers were not
15 able to make contact with my son and could not determine
16 he was okay.

17 Q Okay. So on July 10, 2020, you filed a
18 petition for protective order in the District Court of
19 Maryland for Anne Arundel County. Correct?

20 A Correct.

21 Q What specific acts or statements by Mr.

1 Reichert caused you to file that petition?

2 MR. MCCARTHY: Objection. This has been
3 litigated and has gone off to the Court of Special
4 Appeals and then the Court of Appeals, but go ahead and
5 answer again, Mr. Hornbeck.

6 THE WITNESS: There were a number of factors
7 causing my concern for my son that night, including Mr.
8 Reichert's history of abuse and substance abuse,
9 including his abuse of me and my son and after receiving
10 a voice mail message from Mr. Reichert that afternoon
11 where he stated, and I quote, "You will never see or
12 know your son again," caused me great concern for my
13 son's wellbeing and those are some of the reasons why I
14 was concerned for my son that night.

15 (Plaintiff Exhibit 1 was marked for
16 ID.)

17 BY MR. REYES:

18 Q All right. In the petition, and that is
19 Exhibit 1 to your motion for summary judgement, you
20 allege... we can put it up, Exhibit 1.

21 Are you able to see that?

1 A (Witness looks at Exhibit 1)

2 Yes.

3 Q Okay. That, as far as I understand, is the
4 July 10, 2020 petition for protective order that you
5 filed in the District Court of Maryland for Anne Arundel
6 County on case number D-07-FM20-004669. Did I say that
7 accurately?

8 A That is a portion of the filing; correct.

9 Q Sure. In that filing, you allege a long
10 history of abuse including that Mr. Reichert put a gun to
11 your head while you were pregnant. Do you see that?

12 A Correct.

13 Q What were the circumstances when that event
14 happened?

15 MR. MCCARTHY: Go ahead.

16 THE WITNESS: Okay. This is the, I believe
17 first page. So it is just a portion of my filing.

18 BY MR. REYES:

19 Q We can show you the second page.

20 A Mr. Reichert pointed a hand gun at my
21 forehead and the circumstances surrounding that issue

1 were that Mr. Reichert and I were married at the time.
2 We were visiting his friends, an individual he was in the
3 Army with, named Mike Zeido (ph) and his wife, Kelly
4 Zeido in Northern Virginia. And as we were driving
5 there together, Mr. Reichert was telling me that Mr.
6 Zeido had recently obtained a really cool handgun and he
7 was looking forward to seeing it.

8 When we arrived at the Zeido's home... they I
9 believe were in a fairly small apartment at the time in
10 Northern Virginia and it was one floor and a small area
11 and we were in their home and I was facing some of their
12 photos on the wall or book shelf and Mr. Reichert said to
13 me, "Look at this." And I turned to face him within just
14 a few feet of him and he was pointing a silver handgun
15 directly at my forehead. Um, sitting next to him on the
16 couch, um, was the silver box with sort of a blue velvet
17 lining in the shape of a handgun. And he said to me, "I
18 am a trained killer."

19 Q At the time, were you married?

20 A I believe so.

21 Q At the time, were you pregnant?

1 A I believe so.

2 Q So this gun was in a box you said, like a...
3 one of these boxes that you put a trophy on?

4 A No. Mr. Reichert was holding the handgun
5 with two hands pointing it at my forehead.

6 Q Before - -

7 A It had been removed from the box which was a
8 small, approximately handgun size suit case type box that
9 was silver on the exterior and blue velvet on the
10 interior.

11 Q Okay. Who was present when that happened?
12 Was Mr. Zeido there?

13 A I believe Mr. Zeido. I believe Mrs. Zeido
14 may have been in the other room.

15 Q How about his wife?

16 A I believe she was in the other room. I don't
17 recall.

18 Q Okay. When that incident happened, what did
19 you do? Did you tell Mr., or Mrs. Zeido what had
20 happened?

21 A I told Mr. Reichert. I don't recall telling

1 Mr., and Mrs. Zeido.

2 Q Well, but Mr. Reichert couldn't protect you
3 from Mr. Reichert. So my question is: Did you ask
4 someone else? Did you tell someone else; not Mr.
5 Reichert?

6 A No.

7 Q Why not?

8 A I don't recall.

9 Q Did you report that incident to the police?
10 MR. MCCARTHY: Objection. Go ahead and
11 answer.

12 THE WITNESS: I did not.

13 BY MR. REYES:

14 Q Why not?

15 A Well, we were recently married. I was
16 pregnant. I wanted things to work. And I did not want
17 to involve the police. So I kept it to myself and tried
18 to resolve it with Mr. Reichert.

19 Q How did you try to resolve it with Mr.
20 Reichert?

21 A I told him that I was terrified, that you

1 never point a handgun to anything that you don't intend
2 to harm or kill. And that that was completely
3 unacceptable and awful behavior and it could not continue
4 and he responded, it was just a joke, why don't I think
5 it is funny. I told him it is not funny at all, it is
6 terrifying. And that was how that incident played out.

7 Q So your testimony is that you were terrified.
8 Right?

9 A Correct.

10 Q But you didn't tell anybody. Right?

11 A I think my testimony was that I did not tell
12 Mr., and Mrs. Zeido simultaneous to the incident.

13 Q Okay. Who did you tell?

14 A I don't recall. I likely told friends and
15 family.

16 Q What family? What friends?

17 A I don't exactly recall.

18 Q At the time that you filed that petition,
19 July 10, 2020, were you aware of any ongoing custody
20 disputes between you and Mr. Reichert?

21 A I believe I answered previously this has been

1 protracted custody litigation. So the most recent
2 orders would prevail at the time, but there were likely
3 hearings during that time. I don't recall exactly.

4 Q This is -- you filed the petition for
5 protective order on July the 10th, 2020. Had you not
6 filed on July the 9th, 2020, the previous day, a motion
7 for modification of custody?

8 A Yes. In that timeframe, I did file parallel
9 cases between custody and an order of protection; yes.

10 Q Did you consult with any attorney prior to
11 filing the July 10, 2020 petition?

12 A I believe Mr. McCarthy; yes.

13 Q Okay. The allegations that Mr. Reichert put
14 a gun to your head in the past, did you raise that in
15 litigation that preceded 2020?

16 A To the best of my recollection, you already
17 asked that question and my response was that yes, I
18 believe that issue came up in our divorce proceedings --

19 Q Okay.

20 A -- a number of years prior.

21 Q Did it come up and were you deposed in that

1 case?

2 A Yes.

3 Q Would it have come up in your deposition or
4 in your....

5 Did you go to trial in that case?

6 A Please repeat your question.

7 Q Yeah. Would you have stated the handgun
8 incident in your deposition in that case?

9 A If I was asked about it; yes. I don't
10 recall.

11 Q Well, if not in your deposition, did you
12 go... did the case go to trial?

13 A Yes.

14 Q So if you didn't say it at your deposition,
15 you would have said it at trial. Correct?

16 A Correct.

17 Q It would be in either one of those two
18 transcripts. Correct?

19 A Correct.

20 Q When you filed the petition for protective
21 order on July 10, 2020, who did you file that petition

1 with? Was it a commissioner?

2 A I believe so.

3 Q Did you inform that commissioner about the
4 final consent order from Baltimore City?

5 A I don't recall.

6 Q Did you inform that commissioner about the
7 protective order against you at that time?

8 A I don't recall.

9 Q So you don't know whether you told him or you
10 did not tell him. Correct?

11 A Correct.

12 Q It is possible that you did not tell him?

13 MR. MCCARTHY: I think it is actually listed
14 on the initial protective order, Counsel.

15 MR. REYES: No speaking objections. Thank
16 you.

17 MR. MCCARTHY: Well, you are - -

18 MR. REYES: No speaking objections.

19 MR. MCCARTHY: You are trying to mislead my
20 client, Counsel. It is a valid objection - -

21 MR. REYES: No speaking objections.

1 MR. MCCARTHY: Let me take a look here,
2 because it usually says - -

3 MR. REYES: No speaking objections. She is
4 the only one testifying. Don't testify, Mr. McCarthy.

5 MR. MCCARTHY: Let me take a look... custody
6 filed yesterday, yep. Okay, go ahead.

7 BY MR. REYES:

8 Q Ms. McCarthy - -

9 A What is the question?

10 Q - - Ms. Hornbeck, at the time that you filed
11 that petition, what facts did you believe constitute
12 probable cause for a protective order?

13 MR. MCCARTHY: Objection. There is no
14 probable cause for a protective order, Counsel.

15 BY MR. REYES:

16 Q Ms. Hornbeck, you can answer if you know the
17 answer.

18 A I will not answer.

19 MR. MCCARTHY: You are mischaracterizing a
20 criminal proceeding - -

21 BY MR. REYES:

1 Q You are not answering, because your lawyer
2 asked you not to answer?

3 MR. MCCARTHY: Counsel, rephrase your
4 question in light of Maryland law, because probable
5 cause is not a requirement for a protective order under
6 Maryland law. We are all lawyers here.

7 BY MR. REYES:

8 Q Do you believe that Mr. Reichert's
9 communications rose to the level of abuse when you filed
10 that protective order?

11 A Yes.

12 Q Explain why?

13 MR. MCCARTHY: Objection. Counsel, this has
14 been litigated. This is a matter of res judicata.

15 MR. REYES: I am waiting for the answer,
16 unless you are telling her not to answer.

17 MR. MCCARTHY: I mean, Counsel, I mean you
18 can waste your time on this. We can go right through
19 this protective order proceeding that he lost at, at the
20 appellate level, but I mean Ms. Reichert... Ms.
21 Hornbeck, go ahead and answer. We will take up another

1 20 minutes on this.

2 THE WITNESS: Certainly.

3 MR. MCCARTHY: Go ahead.

4 THE WITNESS: Certainly, yes. Mr. Reichert
5 frequently says and does things that cause me 'great
6 concern for both my safety as well as my son's. On that
7 occasion I was concerned for both my safety as well as
8 my son's. Under Maryland law I 100% believed and the
9 court agreed that Mr. Reichert's actions and
10 communications constitute abuse. I sought relief before
11 a commissioner ex parte, which lasted for a short time
12 before a full hearing where Mr. Reichert was present.
13 The final protective order was thereby issued affirming
14 Mr. Reichert's abuse and Mr. Reichert then appealed the
15 issuance of that final protective order and the
16 appellate court of the State of Maryland affirmed that
17 abuse had occurred and affirmed the lower court's
18 decision.

19 BY MR. REYES:

20 Q Okay. So my question was that whether you
21 thought that it rose to the level of abuse and your

1 answer is yes. Correct?

2 A Correct.

3 Q Okay. Were you aware that prior custody
4 orders permitted communications between Mr. Reichert and
5 you related to G.R.?

6 A I don't recall.

7 Q Even today, you do not recall if the prior
8 custody orders permitted Jeff Reichert to contact you
9 regarding G.R.'s custody?

10 A I would assume so, yes, but I don't recall
11 specifics. There would likely be parameters to the
12 communications, but I don't recall the exact terms of the
13 communication Mr. Reichert was allowed to have with me at
14 that time.

15 Q Did you disclose that in deposition that you
16 filed on July 10, 2020?

17 A I don't recall.

18 Q Do you think it would have been important for
19 the commissioner to know that?

20 MR. MCCARTHY: Objection. Go ahead and
21 answer.

1 THE WITNESS: I don't know.

2 BY MR. REYES:

3 Q In that same petition, Exhibit 1, you claim
4 that Mr. Reichert was harassing you via calls to third
5 parties, including parents, including friends. Did you
6 provide evidence of those calls to the commissioner?

7 MR. MCCARTHY: Objection. Go ahead and
8 answer.

9 THE WITNESS: Yeah, I don't recall the exact
10 evidence I provided the commissioner at the time, beyond
11 my sworn statement.

12 BY MR. REYES:

13 Q So you don't recall whether you discussed
14 prior custody orders with the commissioner and you don't
15 recall whether you showed the commissioner evidence of
16 those calls with family and friends. Correct?

17 A I don't recall.

18 Q Okay. Do you know the name of the
19 commissioner that you made this report to on July 10,
20 2020?

21 A I do not; no.

1 Q Was it a male? Was it a female?

2 A I don't recall.

3 Q On July 11, 2020, the district court entered
4 an interim protective order and that is Exhibit 2. Were
5 you provided a copy of that order? And if so, when? And
6 I can put up the interim protective order. It is Exhibit
7 2, if you need to review it.

8 A No, thank you. I do not need the order.

9 Q Okay.

10 A Yes, an order was entered and I don't recall
11 when I received a copy of that order.

12 Q When you - - but you did receive a copy.
13 Correct?

14 A Yes.

15 Q When you received a copy of that interim
16 protective order, did you read it?

17 A Yes.

18 Q Are you aware that it contained no explicit
19 exception for communications necessary to facilitate
20 child custody or visitation exchanges?

21 A Yes.

1 Q On July 13, 2020, there was a telephonic
2 hearing. Do you recall that?

3 A Yes.

4 Q Did you attend?

5 A Yes.

6 Q Did the district court issue a temporary
7 protective order at that time?

8 A I believe so. I do not recall if we were in
9 district or circuit court at the time; but yes.

10 Q Were you provided a copy of that temporary
11 protective order?

12 A Yes.

13 Q Do you understand or did you understand at
14 the time that the temporary protective order permitted
15 communications necessary for child custody exchanges?

16 A Yes.

17 Q On July 28th, 2020, the circuit court for
18 Anne Arundel County entered a final protective order at a
19 hearing. Do you recall that?

20 A Yes.

21 Q Did you attend that hearing?

1 A Yes.

2 Q Did you receive a copy of the final
3 protective order?

4 A Yes.

5 Q Did you read it?

6 A Yes.

7 Q Does that final protective order state, in
8 portion, that Mr. Reichert can communicate to facilitate
9 child visitations?

10 A Yes.

11 Q Were those visitation exchanges ordered to
12 occur at the South Baltimore City Police Station?

13 A Yes.

14 Q In some applications that you have filed for
15 statement of charges against Mr. Reichert, you have
16 claimed that Mr. Reichert was served on July 12th, 2020
17 at 18:50, which is 6:50 in the afternoon. Do you recall
18 that?

19 A Yes.

20 Q What evidence did you have of service at that
21 time when you made those statements?

1 A I believed I had received the law enforcement
2 return of service of process and I believe it was served
3 at either 5 or 6 p.m. So I may have gotten the time off
4 of in an hour.

5 Q Did you confirm that Mr. Reichert had been
6 served before you filed the charges?

7 A I previously answered your question, sir.

8 Q Okay. So when you filed the charges you
9 already had in your hands, in your possession, the proof
10 of service, the return of service?

11 A I believe so; yes.

12 Q Well, did you or did you not?

13 A I believe I did. I don't recall, exactly,
14 when I received that document. But I did, at some point,
15 receive it. So if I stated the exact time, I likely got
16 that time from the law enforcement return of service.

17 Q When you filed that application for statement
18 of charges, did you believe that the communications that
19 Mr. Reichert had regarding custody were criminal
20 violations?

21 MR. MCCARTHY: Objection to the form of the

1 question. But go ahead and answer to the best of your
2 ability, Ms. Hornbeck.

3 THE WITNESS: I don't know.

4 BY MR. REYES:

5 Q In the July 13, 2020 hearing notice, which is
6 Exhibit 4 to your motion for summary judgement, the court
7 scheduled a telephonic or video conference. Is that
8 right?

9 A I believe so.

10 Q Did you participate in that call?

11 A Please remind me the date?

12 Q July 13th, 2020.

13 A Yes. I believe we already discussed that.
14 That is where I said yes, I appeared and Mr. Reichert
15 appeared telephonically. I don't recall if we were in
16 district or circuit court at that time.

17 Q Do you recall what was discussed at that
18 hearing regarding custody communication?

19 A I do not.

20 Q Okay. On July 14, 2020 you appeared before a
21 district court commissioner and applied for another

1 statement of charges against Mr. Reichert; didn't you?

2 A Yes.

3 Q That is Exhibit 7 to your motion for summary
4 judgement.

5 A Correct.

6 Q What specific communications did you tell
7 that commissioner constituted violations of the
8 protective order?

9 A I provided the documents to the commissioner
10 and if I answered any questions related to that, I may
11 have shown the commissioner my phone or additional
12 documents. I don't recall, but I stand by the truth of
13 my statements in my application for statement of charges
14 both July 14th and otherwise.

15 Q Okay. But you do not recall having shown the
16 commissioner your phone or documents?

17 A I may have. I don't recall exactly. I
18 believe I did; yes.

19 Q So you may have or you may not have. Is that
20 accurate?

21 MR. MCCARTHY: It is not accurate.

1 Objection.

2 THE WITNESS: I did. I said I did.

3 BY MR. REYES:

4 Q Well, you said both. So I need to know which
5 one it is.

6 A I believe I did show the commissioner.
7 Whether it was exactly on that date or other dates. Um,
8 so my application for statement of charges whether on
9 that date or other dates were truthfully made before a
10 commissioner and any supporting evidence would have been
11 shown at that time.

12 Q I know that you have filed many statements of
13 charges, but I am only talking about the one that you
14 filed on July 14, 2020; okay. So regarding that one and
15 if we can put it up as Exhibit 7.

16 (Plaintiff Exhibit 2 was marked for
17 ID.)

18 BY MR. REYES:

19 Q Ms. Hornbeck, this is the criminal summons on
20 charging document....

21 Do you see it?

1 A (Witness reviews Exhibit 2)

2 Yes. I see the first portion of it; yes.

3 Q We can show you more. We can even make it
4 larger. And my question regarding that statement of
5 charges is what specific communications did you tell the
6 commissioner constituted violations of the protective
7 order, including disputes over the 70 plus calls, over
8 the 23 plus emails? So I need to know that.

9 A Right. I stand by my statements in my
10 application for statement of charges and I don't recall
11 exactly which documents I provided to the commissioner at
12 that time.

13 Q Do you know the commissioner, this
14 commissioner? Do you know what... do you know his or her
15 name?

16 A I do not.

17 Q Was it male or female?

18 A I do not know.

19 Q Did you go alone?

20 A I believe so.

21 Q Did you go in person? It has to be done in

1 person?

2 A I don't recall.

3 Q Well, if you went alone....

4 Can it be done by phone?

5 A I don't recall.

6 Q You don't recall or you don't know?

7 A I don't recall.

8 Q So you used to know, but you don't remember?

9 A No, I don't recall.

10 Q Okay.

11 A During COVID, I don't know.

12 Q So you don't know whether you went in person
13 or whether you made the filing or made the allegations by
14 phone?

15 A Correct.

16 Q If you did it by phone, how would you have
17 shown your phone to the commissioner?

18 A By video call.

19 Q Okay. Would you have a record of that call?

20 A I do not.

21 Q Was it by Zoom?

1 A I don't know if it was Zoom or another
2 platform.

3 Q What platforms do you use for video
4 conferences besides Zoom. Do you use Face Time?

5 A I am not aware of the platform the court used
6 during COVID to conduct hearings. I don't know.

7 Q Okay. We can remove the exhibit now. We
8 will mark it.

9 In your answers to interrogatories, interrogatory
10 number 2, you answered that Mr. Reichert called you over
11 seventy times starting at 4 a.m., called your parents 200
12 times, called the Brandeens, had emailed you and your
13 attorney. Can you identify those calls, emails or texts
14 for us today?

15 A I believe we recently obtained phone records.
16 So if I have not yet supplemented my discovery responses,
17 I can do that shortly for you.

18 MR. MCCARTHY: I sent those to you, sir.

19 MR. REYES: Yeah, but that is not what I am
20 asking. I am asking her to identify those calls.

21 THE WITNESS: They are in the documents.

1 BY MR. REYES:

2 Q So you rely on the documents. You are not
3 able to identify the calls, emails or texts at your depo?

4 A Correct.

5 Q Okay.

6 MR. MCCARTHY: Seventy calls, Counsel, yeah,
7 I don't find that to be unusual. It is six years ago.

8 BY MR. REYES:

9 Q Did you answer?

10 MR. MCCARTHY: Yeah, she answered.

11 MR. REYES: No, no, no. You are not the
12 witness.

13 MR. MCCARTHY: Go ahead and answer again,
14 Ms. Hornbeck.

15 THE WITNESS: Yes.

16 BY MR. REYES:

17 Q And what... so what was your... when you
18 answered the phone when Jeff called you, what did you
19 tell him?

20 A I don't recall telling him anything. I
21 recall him just screaming at me.

1 Q Weren't you concerned about the where abouts
2 of your son at the time?

3 A Yes.

4 Q Right. So I am asking you when you and him
5 spoke, what was that exchange?

6 A To the best of my recollection, I asked Mr.
7 Reichert where our... where my son was and he refused to
8 tell me, and instead screamed at me in sort of typical
9 fashion, telling me that you know, I am this terrible,
10 evil, awful person and he is going to get me and I will
11 pay for this and I would never see our son again.

12 Q Okay. He did not tell you where your son
13 was?

14 A Correct.

15 Q You say that you produced email, texts, uh,
16 recently. Correct?

17 A Yes.

18 Q Okay. Of those emails and texts, that you
19 produced recently to us, when did you obtain those
20 records?

21 A Um - -

1 MR. MCCARTHY: Phone records?

2 BY MR. REYES:

3 Q Phone records.

4 A I very recently obtained phone records in
5 response to my attorney's subpoena.

6 Q Okay. You didn't have those records with you
7 in 2020, did you?

8 A No, I just - -

9 MR. MCCARTHY: The phone records?

10 THE WITNESS: - - had my phone with me.

11 BY MR. REYES:

12 Q Okay. So you would have shown, from your
13 phone, the 70 plus calls?

14 A Perhaps. I don't recall exactly. I
15 looked... I recall going before the commissioner, whether
16 telephonically or video conference or in person.

17 Q So you don't recall. No, time out.

18 MR. MCCARTHY: Let her answer, Counsel. Ms.
19 Hornbeck, finish your answer, please.

20 THE WITNESS: Thank you, Mr. McCarthy. To
21 answer the question, I visited either by video

1 conference or in person, the commissioner's office on
2 five separate occasions during the Summer of 2020,
3 including July 14th, July 25th, August 3rd, August 18th
4 and August 21st. On each of those occasions either
5 telephonically or video conference or in person, I filed
6 an application for statement of charges that I shared
7 with the commissioner at the time on those five
8 occasions the ongoing abuse of Mr. Reichert and in
9 support of my statements, I at the time looked at my
10 phone, spoke with other individuals and had the
11 reference materials with me at the time to base my
12 statements on. I had my phone, which would include a
13 call log giving me the numbers of the number of Mr.
14 Reichert's phone calls to my phone, the number of email
15 messages he would have sent and text messages; if any.
16 I stand by my statements in each of those applications
17 for statements of charges and in the event any of the
18 commissioners, that I may have gone before, asked for
19 additional information, I would have provided it at that
20 time.

21 BY MR. REYES:

1 Q Did you inform the commissioner that some or
2 all of the communications that you complained about had
3 to do with the coordination of custody exchanges or
4 visitations with G.R.?

5 A It did not.

6 Q Okay.

7 A These communications - -

8 Q Did you - -

9 MR. MCCARTHY: Let her answer, Counsel.

10 THE WITNESS: In fact, quite the opposite.
11 Mr. Reichert refused to allow me to see our son.

12 BY MR. REYES:

13 Q So your answer is that you discussed, with
14 the commissioners, that some of the calls or texts had to
15 do with custody exchange or visitation?

16 MR. MCCARTHY: Go ahead and answer again.

17 Ms. Hornbeck, did any of these have to do with custody
18 exchange visitations communication?

19 THE WITNESS: No. I would say no. In fact,
20 I believe the requirement is to facilitate custody
21 exchanges. There was no facilitation necessary. It was

1 court ordered Mr. Reichert would bring my son to the
2 Police Station at 6 p.m. And any communications he
3 provided related to custody only indicated that he would
4 not bring Grant and I would never see him again. So
5 though he did not facilitate in any way custody
6 exchanges during that time and in addition to any
7 messages that may have said, he is not bringing our son
8 to visitation, as court ordered, his messages are
9 threatening and abusive and harassment, including 70
10 plus phone calls just to me in one day.

11 BY MR. REYES:

12 Q Did you tell the commissioner that your son
13 was missing?

14 A I don't recall.

15 Q Did you interpret those emails and texts to
16 be criminal in nature?

17 A I don't know the standard for criminal. I do
18 know of harassment and yes, harassment and threatening.
19 Criminal is not a decision that I make. That is up to
20 the court.

21 Q Okay. When you showed those phone records

1 to the court, on the camera or in person, did they verify
2 the time stamps of those calls; the commissioner?

3 A I don't recall.

4 Q Well, do you recall going over it with the
5 commissioner? It is a lot of calls. It would have been
6 a process that would have taken some time.

7 A I don't recall.

8 Q Do you know why you would not recall having
9 gone over 70 plus calls with the commissioner just a few
10 years ago?

11 A No. To the best of my recollection, a call
12 log would instead of looking like date stamps, time
13 stamps would look like a general number of calls. So for
14 example, calls from Mr. Reichert's phone number to my
15 phone and then number of calls listed thereafter.

16 Q That is what a time stamp does; correct.
17 And my question is different. My question is: Did you
18 share that with the commissioner?

19 A I believe so. So for example if my phone
20 showed Mr. Reichert's number and then the number 70
21 missed calls, I may have shown that to the commissioner.

1 Q And when you say, "I may have," it means that
2 you may have or you may not have?

3 A Correct.

4 Q Okay.

5 A I may or may not have shown the commissioner
6 my phone showing 70 missed calls.

7 Q Okay. On July 25, 2020, you file another
8 application for statement of charges. That is Exhibit 10
9 to your motion for summary judgement. We can put it up
10 and we can mark it as an exhibit.

11 A I don't need it.

12 Q You don't need it. Okay.

13 What specific communications did you present to the
14 commissioner at that time, July 25, 2020?

15 A The same answer that I previously provided
16 earlier related to July 14th.

17 Q So on July 25, 2020, you had the same
18 complaint that you had on July 14, 2020?

19 (Pause) Ms. Hornbeck?

20 MR. MCCARTHY: Ms. Hornbeck, did you - -

21 THE WITNESS: My answer - -

1 MR. MCCARTHY: - - difference with the
2 commissioner on that?

3 THE WITNESS: My answer is the same. I
4 appeared before a commissioner either telephonically, by
5 video or in person, uh, completed my truthful
6 application for statement of charges. And in the event
7 the commissioner asked for any documentation, I may have
8 showed at that time.

9 BY MR. REYES:

10 Q Okay. But when you called the commissioner
11 on - - when you met or called the commissioner on July
12 14, 2020, the... that was about the many calls and many
13 emails that you had received the previous night or
14 nights. Right?

15 A Correct.

16 Q But that was not the case on July 25, 2020.
17 Correct?

18 A Correct.

19 Q So why would you show the same evidence that
20 you showed the previous time?

21 A Perhaps I can clarify that I made statements

1 to the commissioner and showed any evidence based on
2 those statements if requested by the commissioner.

3 Q And my question was: What specific
4 communications did you present to the commissioner?

5 A I don't recall specifically.

6 Q So you filed a statement of charges against
7 someone, but you don't recall what about?

8 A The - -

9 MR. MCCARTHY: Ms. Hornbeck, do you remember
10 the - -

11 THE WITNESS: - - documents - -

12 BY MR. REYES:

13 Q She is answering. She is answering. We are
14 okay.

15 A No. Um, Mr. Reyes, in my application for
16 statement of charges, the documents speak for themselves.
17 They are truthfully made at the time of the events. Mr.
18 Reichert's harassment started long before and continues
19 to this day.

20 Q Yeah, but when you made an application for a
21 statement of charges on July 25, 2020, I am fairly sure

1 that you did not speak about 2026. So what I am asking
2 again is when you made that application on July 25, 2020,
3 what did you communicate to the commissioner? Not about
4 2026 and not about July 14. On July 25, 2020, what did
5 you tell the commissioner? And again, Exhibit 10 is
6 that statement of charges. You have the right to - -

7 MR. MCCARTHY: Yeah, you can look at it, Ms.
8 Hornbeck.

9 BY MR. REYES:

10 Q You can look at it.

11 MR. MCCARTHY: Refresh your recollection.

12 THE WITNESS: I stand by what... my
13 statements in my application.

14 BY MR. REYES:

15 Q So you have no recollection?

16 A Correct.

17 Q Okay. When you made that call or visit on
18 July 25, 2020 application for statement of charges, did
19 you tell the commissioner about the custody related
20 context or exceptions in the protective order?

21 A I don't recall.

1 Q Okay. And this commissioner, the one for
2 July 25th, 2020, was it a man or a woman?

3 A I don't recall.

4 Q Let's put up Exhibit 10, please to the motion
5 for summary judgement.

6 MR. MCCARTHY: Counsel, can we take a
7 bathroom break here? We have been at it for about two
8 hours.

9 MR. REYES: Yes. That sounds good.

10 MR. MCCARTHY: All right. We will take a
11 break here real quick and we will come back.

12 MR. REYES: Let's take ten minutes. Ten
13 minutes off the record.

14 MR. MCCARTHY: Yes, that's fine, sir. Thank
15 you.

16 (Whereupon, at 11:54 o'clock a.m., a break
17 was taken, afterwhich the following occurred at 12:06
18 o'clock p.m.)

19 (Plaintiff Exhibits 3 & 4 were marked for
20 ID.)

21 BY MR. REYES:

1 Q You have, before you, your Exhibit 10 to your
2 motion for summary judgement filed in this case. Do you
3 recognize it?

4 A (Witness reviews Exhibit 3)

5 Yes.

6 Q That's the July 25, 2020 application for
7 statement of charges. Correct?

8 A Um, actually, Mr. Reyes, the document you are
9 showing me is the criminal summons.

10 Q It is a criminal summons. You are correct.

11 A There we go.

12 Q There we go. So again, the question that I
13 had asked you before we took a short break was: What
14 specific communications did you present to the
15 commissioner when you filed this?

16 A I don't recall the specific communications.
17 I made that statement and may have referred to my phone
18 and the underlying communications at the time I made the
19 statements and in the event the commissioner asked me for
20 any of those communications I would have shown them.

21 Q Okay. In that application for statement of

1 chares, it states that...

2 MR. REYES: Let's go up. Can we make it a
3 little larger? I can barely read it. There we go.
4 Okay, there.

5 BY MR. REYES:

6 Q When you filed this application, it says here
7 that Mr. Reichert texted you nine times. And you go
8 ahead and state that it was on July 22nd and you state
9 the times and you state that it is by text and that it
10 includes threats, "It's coming very soon and very hard."
11 Did you show that text to the commissioner?

12 A I don't know.

13 Q Did any of those texts, those 9 texts that
14 you have alluded to in this application, relate to
15 custody of G.R.?

16 A No. Mr. Reichert did not allow me to have
17 any custody or see my son at all during that time.

18 Q Did the communications relate to custody of
19 G.R.?

20 A No. None of this communication related to
21 facilitation of custody what so ever.

1 Q What were the texts related to?

2 A Don't know. Just Mr. Reichert being Mr.
3 Reichert to the best of my recollection.

4 Q You don't know what the texts were about?

5 A No.

6 Q Okay. But yet you were terrified by them?

7 A Yes.

8 Q Let's move on to... let's put up Exhibit 13,
9 please. And we are going to be discussing now, the
10 August 8th, 2020, 3rd application that you filed. We
11 will mark this, exhibit, I think it is 5.

12 (Plaintiff Exhibit 5 was marked for
13 ID.)

14 BY MR. REYES:

15 Q Do you recall having filed that application,
16 Ms. Hornbeck?

17 A Yes.

18 Q On August 8, 2020.

19 A I am not sure if it is the 8th or the 3rd.
20 Um, yes, 8th; there it is. Thank you.

21 Q In that application, you describe the

1 violations that you think that Mr. Reichert committed,
2 which includes three calls on August 3rd, 2020. Correct?

3 A Correct.

4 Q And five emails on August 3 through 6, 2020.
5 Correct?

6 A Correct.

7 Q What were the violations?

8 A I don't recall exactly. I recall making the
9 statement using all the information I had at the time to
10 accurately and in a detailed manner, compete this
11 statement to the commissioners and then provide them any
12 information requested.

13 Q Yeah, but this application only says that he
14 wrote to you and that he called you.

15 A Right.

16 Q He could not write to you and he could not
17 call you for anything?

18 A He could to facilitate visitation, which none
19 of these were about facilitating visitation.

20 Q Okay. What were these about then?

21 A I don't recall. Just harassment. As usual,

1 threatening, difficult, yelling at me telling me how
2 awful I am; um, yes.

3 Q I need you to describe how he harassed you
4 for you to make this application. What did he utter?
5 What did he tell you? What did he write to you?

6 A I don't recall exactly. Mr. Reichert, as I
7 stated previously, I think quite a few times at this
8 point, is an abuser, both of me and my son. His
9 communications are abusive and they are threatening and I
10 have requested repeatedly that he cease communicating
11 with me. The specific content of these messages, I don't
12 recall, but they were unwarranted, unwelcome, harassment,
13 threatening, abusive messages.

14 Q Okay. What was unwarranted, unwelcome and
15 abusive about these calls and these texts?

16 A As I just stated.

17 Q You just stated that you don't recall.

18 A I stated his communications are abusive,
19 harassing - -

20 Q Right. And I am asking you - -

21 A - - threatening - -

1 Q And I am asking you in those communications,
2 the ones that you filed charges against him on August 8,
3 2020, what was abusive about them? What was unwarranted
4 about them? What was unwelcome about them?

5 A Well - -

6 Q And I think you answered that you don't
7 recall. And I am trying to confirm that.

8 A Yes, yes. Any - - I think apologies, because
9 I thought I had made it clear. Any communications from
10 Mr. Reichert to me are unwelcome. They are abusive, they
11 are harassing and prohibited by the protective order
12 other than to facilitate visitation, which he did not.
13 In fact, he did not facilitate or allow any visitation
14 during that time frame. So I did not see my son. These
15 communications were all harassment.

16 Q But you don't recall the substance or the
17 content of these communications. Right?

18 A Right. I thought I had already described Mr.
19 Reichert's communications to me in general are hostile.
20 They are argumentative. They are belittling. He calls
21 me evil. He tells me I will pay for this, my time is

1 coming, I am going to get you. That's the type of thing
2 that he repeatedly says.

3 Q You have repeatedly said that in your
4 deposition, but I am asking you about August 8, 2020. I
5 am trying to understand the three calls and the five
6 emails that you reported him on, what did they convey to
7 you?

8 A I don't have any further answer for you in
9 addition to what I have already answered.

10 Q You don't recall the content or substance of
11 those calls or emails. Is that accurate?

12 A Right. I think I already answered his
13 communications in general.

14 Q When you filed that complaint on August 8th,
15 2020, did you discuss to the commissioner, did you
16 disclose to the commissioner the custody exceptions that
17 if your communications were about the custody of G.R.,
18 they were permitted?

19 A I don't know.

20 Q Okay.

21 A But they weren't about custody or

1 facilitating visitation; that I do know.

2 Q So what were they about then?

3 A I have already answered that.

4 Q Okay. Were you terrified by these
5 communications, the ones that you reported on August 8th,
6 2020?

7 A Yes.

8 Q What terrified you about those communications
9 in particular?

10 A I have already answered that.

11 Q You have not. This is the first time I asked
12 this question.

13 A His abusive, threatening messages are
14 terrifying to me.

15 Q Okay. Describe, to me, the abusive,
16 threatening messages that you reported him on August 8th,
17 2020?

18 A Those contained in the documents; that is
19 everything.

20 Q I am looking at the document. You can show
21 it to us. It is on the screen.

1 A I am sorry. What did you want? Did you want
2 the underlying documents from those - -

3 Q No. You said that it is in the document.
4 Well, the document is Exhibit 5 on the screen. So I am
5 asking you to point to the document, since you are saying
6 he called you or he wrote to you with abusive....
7 I want to know what he told you. I want to know what he
8 wrote to you.

9 A Exactly what I told you previously.

10 Q But you told me that you are answering in
11 general terms. And I am not asking you questions that
12 are general. I am asking you about August 8, 2020. I
13 want to know what you reported Jeff Reichert on - -

14 A All of his - -

15 Q - - August 8th, 2020.

16 A - - abusive, threatening, terrifying
17 communications during that entire timeframe.

18 Q Yeah, but we are not talking about the entire
19 timeframe. We are talking about August 8, 2020 and we
20 are talking about specifically, it's three, three calls
21 and five emails. So of those three calls on August 3,

1 2020, and five emails, between August 3 and August 6, on
2 August 6, 2020, what terrified you?

3 A It is him, your client, Mr. Reichert
4 perpetuating a pattern of abuse, including these
5 communications. His abuse continues, as I mentioned, to
6 this day. He is extremely disturbed and unstable and his
7 communications were unwarranted and during this time
8 frame, including these dates, he would say things that
9 you know, he is coming to get me and I will pay for this
10 and tell me how, you know, just awful and terrible I am.
11 He is an abuser and he abused me, including these
12 communications during this time.

13 Q Okay. So in the August 8, 2020 complaint and
14 charges, you were complaining about Jeff Reichert having
15 told you on August 3rd, he sent you emails between August
16 3rd and 6th, that he is coming to get you?

17 A During that time frame, yes. I don't recall
18 as I already mentioned.

19 Q Well, the timeframe, the timeframe is August
20 8, 2020. It is one day.

21 MR. MCCARTHY: But I think the emails she is

1 talking about, Counsel, are from 8-3 to 8-6.

2 MR. REYES: They are.

3 MR. MCCARTHY: Thank you.

4 BY MR. REYES:

5 Q And that is what you are referring to. So in
6 those emails and in those calls, he wrote I am coming to
7 get you?

8 A In the timeframe of July through August. I
9 don't recall the exact substance of these exact - -

10 Q Ms. Hornbeck, we are talking about what you
11 filed on August 8, 2020. We are not talking about all
12 the other things that you filed against Mr. Reichert. We
13 are talking about that particular filing that is about
14 three calls and five emails. So regarding those three
15 calls and those five emails, what did Reichert tell you
16 that terrified you?

17 A I don't recall exactly during that specific
18 timeframe.

19 Q Okay. Did you show the three calls to the
20 commissioner?

21 A I believe so; yes.

1 Q Did you show the emails to the commissioner?

2 A I believe so.

3 Q Was that in person or by video conference or
4 by phone?

5 A I don't recall.

6 Q Was the commissioner a male or a female?

7 A I don't recall.

8 Q Did you show him or her the calls on your
9 phone?

10 A I believe so; yes.

11 Q Did you do that on a screen or did you do
12 that in person?

13 A I don't recall.

14 Q Did you hand that person the phone or not?

15 A No.

16 Q You did not? You kept the phone in your
17 hand?

18 A Yes.

19 Q What phone is that?

20 A Um, an I-Phone.

21 Q It is an I-Phone. You still have that

1 I-Phone?

2 A I don't believe so.

3 Q Do you still have the same service provider?

4 A I believe so.

5 Q And your service provider is what, AT&T or

6 Verizon or which one of these - -

7 A AT&T; correct.

8 Q AT&T; okay. And what is the number?

9 A Area code 410-733-4566.

10 Q Thank you.

11 We are going to move on to the complaint and
12 charges that you filed on August 18, 2020, which is the
13 fourth application in this lawsuit. And it is Exhibit
14 14 to your motion for summary judgement. And we can put
15 it up, please.

16 (Plaintiff Exhibit 6 was marked for

17 ID.)

18 BY MR. REYES:

19 Q Ms. Hornbeck, is this the August 18, 2020
20 application that... for statement of charges that you
21 filed?

1 A Yes.

2 Q Who helped you file that application?

3 A I don't recall anyone helping me file this
4 application.

5 Q It is your testimony that you did it
6 yourself?

7 A Yes.

8 Q Okay. In this application you allege... I am
9 trying to read. Is this your handwriting on the
10 application?

11 A (Witness reviews Exhibit 6)

12 Yes.

13 Q You are talking about August 17th, 2020. It
14 says what, he is stalking you? Is that stalking?

15 A Yes.

16 Q Okay. Please describe that, that incident
17 that he was stalking you between August 8th and August
18 18th?

19 A I don't recall.

20 Q You don't recall Jeff Reichert stalking you?

21 A Correct.

1 Q Do you recall him harassing you?

2 Who is speaking? Who is speaking besides you, Ms.
3 Hornbeck?

4 A I think it is background noise from another
5 call.

6 Q Are you alone in the room?

7 MR. MCCARTHY: That is background noise from
8 me, Counsel. I apologize.

9 MR. REYES: Okay. No problem.

10 BY MR. REYES:

11 Q And then this application form statement of
12 charges mentions or talks... yeah, references three
13 messages and a message says, "Watching." Correct?

14 A Correct.

15 Q What is harassing about that in your mind?

16 A A lot.

17 Q Okay. "A lot," I need it described for us,
18 please.

19 A Sure. Mr. Reichert is an abusive individual.
20 He has abused me for years. And communications from him,
21 including this specific timeframe constitute ongoing

1 harassment, stalking, cyber stalking. And for him to
2 tell me that he is quote, watching, is extremely
3 terrifying when he should not have been in the same
4 vicinity.

5 Q Should not have been where?

6 A In the same vicinity.

7 Q Did you see him?

8 A No.

9 Q Could, "watching," have meant something
10 else - -

11 A I have no idea.

12 Q - - that - -

13 A He is terrifying. He is probably watching
14 me.

15 Q So you don't know; okay.

16 A Correct.

17 Q When you filed this application for statement
18 of charges, did you meet the commissioner in person or
19 not?

20 A I don't recall.

21 Q Did you discuss, with the commissioner, that

1 there were custody exceptions?

2 A I don't recall.

3 Q Where did you live on August 18, 2020?

4 A I maintained my residence in Baltimore City.
5 I lived in Baltimore City, but I spent time else where
6 like I mentioned previously.

7 Q But you lived in Baltimore City; correct?

8 A Correct.

9 Q Okay. When you thought that Jeffrey Reichert
10 having told you that he is watching, that that was
11 threatening, did you share that with anybody?

12 A I probably told my family, friends; yes.

13 Q Who did you tell?

14 A I don't recall.

15 Q Who is your family and friends? Is your
16 family mom and dad?

17 A Yes. I have parents and aunts, uncles,
18 cousins.

19 Q Would you have discussed this frightening
20 moment with all of your family or with mom and dad or
21 with someone else beyond mom and dad?

1 A I don't recall. It was, you know, about six
2 years ago.

3 Q And would you have discussed it with friends?
4 What friends would those be?

5 A Friends over the years. Some friends I went
6 to college with, I remained close with, some friends from
7 more recently, um, I may have discussed this - -

8 Q Who?

9 A - - with some of my friends.

10 Q Who?

11 A I don't recall exactly.

12 Q You don't know the names of your friends or
13 you don't know who - - I am trying to understand who
14 would you have discussed this with since you mentioned
15 that you may have discussed it with friends and family,
16 who that friend would have been; one friend?

17 A Oh, I don't have a specific name. I have a
18 number of friends I may have talked about this.

19 Q But you don't recall who you would have told
20 that you were terrified?

21 A Correct.

1 Q Let's put up Exhibit 15, please.

2 (Plaintiff Exhibit 7 was marked for
3 ID.)

4 BY MR. REYES:

5 Q Ma'am, this is Exhibit 15 for your motion of
6 summary judgement. Do you recognize it?

7 A (Witness reviews Exhibit 7)

8 Yes.

9 Q It is an email of August 17, 2020 at 12:39
10 p.m. Correct?

11 A Correct.

12 Q Does it discuss G.R.'s custody?

13 A No, it does not facilitate custody. It, in
14 fact, says one, "You are not seeing Grant on Friday... or
15 at any time in the near future."

16 Q And in your opinion, that is not a discussion
17 of Grant's custody?

18 A It is not, in my opinion, facilitation of - -

19 Q Okay. Thank you.

20 A - - his visitation.

21 Q We will mark this exhibit also, Madam Court

1 Reporter.

2 I am going to ask you questions about a 5th
3 application that you filed against Jeff Reichert on
4 August 21, 2020. And that will be Exhibit 16 for your
5 motion for summary judgement. And we can put it up and
6 we can mark it, please.

7 (Plaintiff Exhibit 8 was marked for
8 ID.)

9 BY MR. REYES:

10 Q Very well. Do you see that on your screen,
11 Ms. Hornbeck?

12 A (Witness reviews Exhibit 8)

13 I do.

14 Q Okay. Is this the application for statement
15 of charges that you filed August 21, 2020?

16 A Yes.

17 Q Did you file it in person or by video
18 conference or telephonically?

19 A I don't recall.

20 Q Was the commissioner a man or a woman?

21 A I don't recall.

1 Q In this application for statement of charges,
2 you wrote - - that's your handwriting?

3 A Yes.

4 Q That Mr. Reichert has a long history of
5 abusive behavior and including acts that led to issuance
6 of a FBO in AA County, Circuit in the past, as well as
7 another recent FBO in AA County, Circuit Court, in place
8 for one year until July 28, 2021. Since the FPO - -
9 let's go to the next page - - was issued, Mr. Reichert
10 has violated the terms of the FPO repeatedly. Let me
11 skip what ever I need to skip until I get to what I need
12 to read to you.

13 A Apologies for my handwriting.

14 Q You have pretty good handwriting; not bad.

15 A Not too bad, but it could be better.

16 Q So in this statement of charges, what is it
17 that happened? Mr. Reichert is calling you from jail?

18 A Correct.

19 Q And he wants to know the where abouts of his
20 son?

21 A No.

1 Q What did he call you for?

2 A I have no idea, but further literal abuse and
3 harassment. Apparently, he had been arrested and he
4 called me from the jail. He identified himself. I hung
5 up and he called back. I was actually on the phone with
6 Officer Cook of Anne Arundel County at the same time.
7 And also, I recall I was in the presence of my father at
8 the same time and I was asking Officer Cook where my son
9 was. And he couldn't find him. So I saw an unknown
10 number. I answered. Mr. Reichert identified himself and
11 literally started screaming at me that, you know, I am
12 going to get you for this. And I tried to ask him where
13 is my son and he would not answer and provided me
14 absolutely no information related to my son's
15 whereabouts.

16 Q Do you know why Jeff Reichert was in jail?

17 A No.

18 Q When he called you?

19 A No.

20 Q Do you know why he had been arrested?

21 A No.

1 Q You don't know that it had to do with you?

2 A No.

3 Q Okay. Did you discuss, with Officer Cook,
4 that there were custody exceptions that Mr. Reichert
5 could discuss?

6 A I don't recall my discussions with the
7 officer outside of what I already shared with you that I
8 was looking for my son and was not able to find him.

9 Q So you didn't know where your son was?

10 A Correct.

11 Q Do you believe that a call from the detention
12 center violated the order?

13 A Absolutely.

14 Q How so?

15 A If Mr. Reichert, as he did, called from the
16 detention center, and continued to threaten, harass and
17 annoy me in violation of the protective order, that is an
18 absolute violation; yes.

19 Q Okay. What threat did he make when he called
20 you?

21 A I... nothing further than what I previously

1 shared.

2 Q You have not shared what he told you on this
3 date; on this call.

4 A I thought I had mentioned he was yelling and
5 screaming at me. You know - -

6 Q You haven't - -

7 A - - this is all your fault. I am coming to
8 get you; I will get you. You know, sort of his usual
9 yelling and anger directed at me.

10 Q So what he has told you was I am coming to
11 get you?

12 A That was part of it; yes.

13 Q What is the rest of it?

14 A Everything I just told you.

15 Q Nothing else?

16 A Not that I recall.

17 Q Okay. For each of the five occasions that
18 you sought charges against Jeff Reichert on July 14, July
19 25, August 8, August 18 and August 21, did you inform the
20 different commissioners that Mr. Reichert was permitted
21 to communicate with you regarding child visitation?

1 A I think I have already answered that
2 individually for each occasion.

3 Q Okay. And in general terms the answer is I
4 don't recall?

5 A In general terms, I may have with some
6 commissioners and I don't recall if it was with all
7 commissioners.

8 Q Do you think that the statement of charges
9 that you filed interfered with Mr. Reichert's parental
10 rights?

11 MR. MCCARTHY: Objection, and Counsel, that
12 has absolutely been adjudicated.

13 BY MR. REYES:

14 Q You may answer.

15 A I will not answer that.

16 Q You won't answer?

17 A Correct.

18 MR. REYES: Let's mark it please.

19 BY MR. REYES:

20 Q Do you believe that the criminal charges
21 that you initiated against Jeffrey Reichert interfered

1 with his professional reputation as an attorney?

2 A I had no idea.

3 Q Did you discuss filing these applications for
4 statement of charges with your lawyer?

5 A I don't believe so.

6 Q Did you discuss filing these applications for
7 statement of charges with Dave Brandeen?

8 A I may have. I don't recall.

9 Q Did you discuss filing these applications for
10 statements of charges with John Michael, Jr.?

11 A No.

12 Q In your answers to interrogatories, at
13 interrogatory number 11, you describe the July 10, 2020
14 missing persons report. Do you recall that?

15 A Yes.

16 Q What efforts did you make to locate your son,
17 G.R., before filing?

18 MR. MCCARTHY: Objection. Go ahead and
19 answer.

20 THE WITNESS: On July 10, I spoke with my
21 son at about lunch time. I told him I was looking

1 forward to seeing him. Grant - - my son told me at
2 that time he was at his dad's house, but his dad was not
3 home. And I went to pick him up that evening at 6 p.m.,
4 pursuant to the court ordered custody schedule and he
5 was not there. And I tried calling my son's phone. I
6 tried looking at his locator. I tried contacting Mr.
7 Reichert and no one responded other than Mr. Reichert
8 communicated that I would, "Never see or know my son
9 again." And that caused me great concern and at some
10 point, thereafter, I believe I spoke with my attorney.
11 I called law enforcement in Anne Arundel County and
12 explained the situation and asked for their assistance.
13 Anne Arundel County policers officers indicated that
14 they would go to Mr. Reichert's home. At that point, he
15 lived in Arnold County at 122 River Breeze Place and law
16 enforcement directed me to wait at a nearby location. I
17 traveled to that location. My dad was with me and after
18 quite some time, law enforcement reported back to me
19 that they were unable to locate my son in that home.
20 And they asked me to travel to the nearby precinct,
21 which I did and wait in the parking lot as it was during

1 COVID and I don't think people were allowed in the
2 building, other than employees perhaps... and waited and
3 I believe I spoke with my attorney again and waited some
4 more and law enforcement came out to my vehicle and said
5 they could not locate my son; they could not communicate
6 with Mr. Reichert. They had tried to reach him. They
7 said, I believe to the best of my recollection something
8 like he keeps hanging up on us and saying he is in
9 Connecticut, but he is driving back, but we don't have a
10 good connection. He won't tell us where your son is and
11 after some time, of that exchange, the police officers
12 involved said that they recommended I file a missing
13 persons report and they brought the paperwork out to me;
14 asked me a couple of questions and completed the
15 paperwork and told me that this would give them
16 additional resources to try to locate my son and ensure
17 his safety.

18 So at no time, did Mr. Reichert or anyone tell me
19 where my son was, whether or not he was okay. At no time
20 did Mr. Reichert tell law enforcement throughout the
21 entire night. I believe I stayed in the parking lot of

1 the precinct and my dad was with me and I spoke with my
2 attorney a number of times throughout the night. It was
3 not until the next day that apparently Mr. Reichert
4 returned and told law enforcement where my son was; where
5 he had been apparently at a different location and his
6 story, after the fact, is that he had a pre-planned sleep
7 over, which is untruthful.

8 Q So I had asked you... so the people who know
9 about... the people that you spoke with regarding July
10 10, 2020, that include your attorney? And I assume you
11 are referring to Brennan McCarthy?

12 A Correct.

13 Q And also your father, because you said that
14 you went with him to the station. Right?

15 A Correct.

16 Q Someone else?

17 A My younger son, who was only four at the
18 time.

19 Q Your younger son; okay. Then you say that
20 you spoke to the cops and that makes me think that you
21 spoke to more than one police officer?

1 A To the best of my recollection, over the
2 course of the evening, there were... yes, there was more
3 than one police officer involved at the precinct - -

4 Q Okay.

5 A - - and I believe more than one at Mr.
6 Reichert's home that evening.

7 Q Okay. Do you know these police officers?

8 A I do not.

9 Q Did you receive any communications from your
10 son, G.R., on July 10, 2020 telling you that he had a
11 sleep over?

12 A No.

13 Q So you first learned that G.R., your son was
14 at a friend's house when the police told you so?

15 A The following day; correct.

16 Q After you filed the report, not before?

17 A Correct.

18 Q In your answer to interrogatories,
19 interrogatory number 1, you identified a few persons as
20 people who have knowledge regarding this... the events
21 that lead to this lawsuit; okay. And you listed Richard

1 L. Hornbeck and I assume that that is your dad. Correct?

2 A That is my dad, correct.

3 Q You listed Linda M. Hornbeck. I assume that
4 is your mom.

5 A Correct.

6 Q You listed David Brandeen, deceased. Who is
7 that?

8 A A friend.

9 Q You listed Doug Brandeen. Who is that?

10 A A friend.

11 Q Okay. Could you please describe your
12 father's knowledge of the events since you listed them as
13 witnesses?

14 A My father's involvement was in person or by
15 phone. He would either be present or perhaps hear from
16 me what was going on.

17 Q Has your dad been arrested?

18 A Mr. Reichert had both me and my dad arrested;
19 yes.

20 Q So your dad has been arrested. That is a
21 yes?

1 MR. MCCARTHY: Objection to this line of
2 questioning, Counsel, but I mean go ahead and answer if
3 you know, Ms. Hornbeck.

4 THE WITNESS: Yes, yes. That is all we will
5 say about that.

6 BY MR. REYES:

7 Q Was he arrested for assaulting Jeff Reichert?

8 A I don't recall.

9 Q Do you think Mr. Hornbeck would recall why he
10 was arrested?

11 A Um, I don't know the charges... I don't know
12 Mr. Reichert's statements to the police; I wasn't there.
13 I was there when this alleged incident happened and that
14 was nothing of the sort that Mr. Reichert, um, alleges.

15 Q Do you think that Richard Hornbeck would
16 recall why he was arrested?

17 A If he saw the documents; sure. I think he
18 would recall exactly that Mr. Reichert had him falsely
19 arrested, sure, by making up untruthful statements and
20 subsequently being released shortly thereafter.

21 Q Were you also arrested?

1 A Yes.

2 MR. MCCARTHY: Objection. But go on - -
3 yeah, you answered.

4 THE WITNESS: Sure. Yes.

5 BY MR. REYES:

6 Q Why were you arrested?

7 MR. MCCARTHY: Objection; go ahead and
8 answer. And what timeframe are we talking about,
9 Counsel?

10 MR. REYES: The time frame of this. She
11 says in interrogatory number 1 - -

12 MR. MCCARTHY: Right.

13 MR. REYES: - - well, that would have been on
14 December, 2011.

15 MR. MCCARTHY: Yes. That is an awful long
16 time ago. Yeah, I mean with consideration - -

17 MR. REYES: Mr. McCarthy, thank you, but I
18 am not deposing you. I am deposing her.

19 MR. MCCARTHY: Yeah, but I am going to put
20 my objection on the record.

21 MR. MCCARTHY: And that is okay. You can

1 object.

2 MR. MCCARTHY: I am going to right now.
3 Then I am going to put the basis of my objection. You
4 have heard of this, right? The basis of my objection is
5 that in order for this to be relevant, it has to be
6 within ten years and has to be a crime that is infamous,
7 but to the extent Ms. Hornbeck, that you know the
8 answer, please answer even though it is irrelevant.

9 THE WITNESS: In 2011, Mr. Reichert came to
10 my condo in Baltimore City to pick up my son for his
11 scheduled visitation. He claimed that my father and I
12 assaulted him at that time. He made statements to the
13 police. Subsequent, based on his statements to the
14 police, my father and I were arrested. And the charges
15 were dropped and he has been untruthful on that occasion
16 as well as many others.

17 BY MR. REYES:

18 Q Was there a recording of the assaults by you
19 and by your father on Jeff Reichert?

20 A There were actually two recordings. My condo
21 building has surveillance cameras at the door where this

1 alleged incident occurred. And also, Mr. Reichert had a
2 video camera which he literally shook and said stop
3 assaulting me. So thankfully, for the subsequent video
4 footage pulled from my condo building we could prove his
5 lies.

6 Q Isn't it true that the charges were dropped,
7 because the cop did not show up to testify?

8 A I - -

9 MR. MCCARTHY: Objection. Go ahead.

10 THE WITNESS: I mean the State's Attorney
11 did not pursue any charges.

12 BY MR. REYES:

13 Q Did the cop show up to testify?

14 MR. MCCARTHY: Same objection. Go ahead and
15 answer.

16 THE WITNESS: There are - - I think it is
17 challenging to answer when I just said there were no
18 charges. So there would be no court date. So there
19 would be no reason for the police officer to appear when
20 there's no charges and no court date.

21 BY MR. REYES:

1 Q Okay. You also listed Linda Hornbeck as
2 having knowledge of the events involved in this lawsuit.
3 What is it that she knows?

4 A She knows, firsthand, and anything likely
5 that my dad and I may have shared with her.

6 Q What does she know first hand?

7 A Uh - -

8 Q What does she know first hand?

9 A Uh, she knows Mr. Reichert personally. She
10 has experienced and seen his abuse firsthand and she was
11 contacted, by him, during this timeframe. And she spent
12 a pretty significant amount of time in Maryland and may
13 have been present around some of these incidents.

14 Q The cop that you said did not have to
15 testify, does your son, G.R. know that cop; that police
16 officer?

17 A I have no idea.

18 Q Okay.

19 A I can not imagine why my son would know that
20 police officer. So not to my knowledge, unless Mr.
21 Reichert introduced him.

1 Q Well, there is no other reason why he, being
2 your son, G.R., would know this police officer? Right?

3 A Not to my knowledge.

4 Q Okay. I am not going to ask about David
5 Brandeen, because he is deceased, but I am going to ask
6 you about Doug Brandeen, what knowledge would he have
7 about the allegations made in this complaint?

8 A Mr. Brandeen would likely just know that Mr.
9 Reichert has communicated directly with him numerous
10 times, including text messages and phone calls that were
11 unwelcome and that I believe Mr. Brandeen requested Mr.
12 Reichert cease communicating with him. He's - - Mr.
13 Reichert threatened Mr. Brandeen's business and I believe
14 communicated with some of his co-workers.

15 Q How do you know Doug Brandeen?

16 A He is a friend.

17 Q So he is a friend. And David Brandeen, who
18 is deceased, he was also a friend?

19 A Correct.

20 Q Did you have a relationship with David
21 Brandeen or with Doug Brandeen - -

1 MR. MCCARTHY: Objection. Go ahead and
2 answer.

3 BY MR. REYES:

4 Q - - besides friendship?

5 MR. MCCARTHY: Objection, again. Just go
6 ahead and answer, Ms. Hornbeck.

7 THE WITNESS: I am not going to answer.

8 MR. REYES: Please mark it.

9 THE WITNESS: I did not have a relationship
10 with Doug Brandeen. David Brandeen is deceased. We
11 dated for a short time.

12 MR. MCCARTHY: Thank you.

13 THE WITNESS: Thank you.

14 BY MR. REYES:

15 Q Did you discuss the filing of the protective
16 order or the applications for statement of charges with
17 your parents?

18 A I don't recall.

19 Q Did you discuss it with the Brandeen's?

20 A Um, I may have. I don't recall exactly.

21 Q Did you discuss the filing of the protective

1 orders or state - - applications for statement of
2 charges with John Michael, Jr.?

3 A No.

4 Q At any time?

5 A No, I did not.

6 Q You have never discussed this case with John
7 Michael, Jr.?

8 A Yes, after the filing; yes. Apologies if I
9 did not understand your timeframe. This case,
10 absolutely, subsequent to these filings; yes.

11 Q Okay, but not - - you did not discuss it with
12 him in 2020. Right?

13 A Correct. That's correct.

14 Q Did John Michael, Jr., assist you in any of
15 these filings?

16 A He did not.

17 Q Were you in touch, in contact with John
18 Michael, Jr., in 2020 or you met him after?

19 A I actually met Mr. Michael back in law school
20 in 2000.

21 Q Okay. But - - and in 2020, you were not in

1 touch with him?

2 A Not really; maybe toward the end of 2020.

3 Q Is the end, is towards the end of 2020 August
4 of 2020 or no?

5 A No.

6 Q Have you communicated with Concordia
7 Preparatory School (ph) the school that G.R. went to - -
8 MR. MCCARTHY: No, no. Objection, Counsel,
9 this absolutely violates the courts order. Don't answer
10 that, please.

11 MR. REYES: It does not and I am not done
12 asking the question.

13 MR. MCCARTHY: Absolutely violates the
14 court's order. You and I both know it.

15 MR. REYES: Ma'am, this is my question.

16 MR. MCCARTHY: In essence, she is being
17 instructed not to answer any communications to
18 Concordia. That is a separate case, Counsel. Thank
19 you.

20 BY MR. REYES:

21 Q Ma'am, I am going to put the question on the

1 record and then - -

2 MR. MCCARTY: Okay.

3 BY MR. REYES:

4 Q - - you are going to either answer or not
5 answer. The question is this: Have you communicated
6 with Concordia Preparatory School during the relevant
7 time period concerning G.R., Jeff Reichert and the
8 malicious prosecution efforts that are detailed in his
9 complaint against you?

10 MR. MCCARTHY: During the 2020 timeframe,
11 Ms. Hornbeck, you can certainly answer to that.

12 THE WITNESS: No.

13 BY MR. REYES:

14 Q That is not my question.

15 MR. MCCARTHY: Okay.

16 BY MR. REYES:

17 Q You need to answer my question, not your
18 lawyer's question.

19 MR. MCCARTHY: And I gave her the parameters
20 on the answer, Counsel. If you are asking whether she
21 has ever discussed this case with Concordia, that is

1 completely irrelevant.

2 MR. REYES: I disagree. Madam Court
3 Reporter, please mark this question for the court.

4 MR. MCCARTHY: Thank you very much. Please
5 do Court Reporter.

6 BY MR. REYES:

7 Q Next question - -

8 MR. MCCARTHY: There is currently a case
9 pending against Concordia in the court. The court was
10 specific about saying you are not going to get into
11 anything having to do with other cases; okay.

12 MR. REYES: This case - -

13 MR. MCCARTHY: This is what you are doing.

14 MR. REYES: This case - -

15 MR. MCCARTHY: This is exactly what you are
16 doing.

17 MR. REYES: This case? This case that we
18 are here - -

19 MR. MCCARTHY: No, no, no, no. The separate
20 case - -

21 MR. REYES: ... malicious prosecution - -

1 MR. MCCARTHY: - - that Concordia - -

2 MR. REYES: - - but I am moving on.

3 BY MR. REYES:

4 Q Ms. Hornbeck, did Concordia Preparatory
5 School assist you in any malicious prosecution efforts in
6 this case?

7 MR. MCCARTHY: You can answer that, Ms.
8 Hornbeck.

9 THE WITNESS: Okay. So Mr. Reyes, there is
10 no malicious prosecution, I hope you know - -

11 BY MR. REYES:

12 Q No, I don't - -

13 A Mr. Reichert is abusive and when I filed
14 application for statements of charges, in July and August
15 of 2020, it was for the sole reason to bring him to
16 justice. There is no malicious prosecution. So I
17 disagree with your mischaracterization. This is
18 malicious prosecution and to the extent that I have
19 discussed anything related to any court proceedings with
20 Concordia, my focus with my son's school is his
21 wellbeing. So in the event they needed to be aware of a

1 court filing, I may have brought that to their attention.
2 I don't recall any occasion where this case would be in
3 any way relevant to anything including my son's school.

4 Q Okay. Who did you discuss it with at
5 Concordia Prep School?

6 MR. MCCARTHY: Objection; asked and
7 answered. Go ahead - -

8 THE WITNESS: No one.

9 MR. MCCARTHY: - - and answer.

10 BY MR. REYES:

11 Q I am sorry. I can not hear you with your
12 lawyer interrupting.

13 MR. MCCARTHY: Yes. Your lawyer is putting
14 an objection on the record. I was interrupted by
15 Counsel. So I will say it again.

16 MR. REYES: Objection noted. Go ahead - -

17 MR. MCCARTHY: Objection. Thank you very
18 much.

19 BY MR. REYES:

20 Q - - Ms. Hornbeck.

21 A I believe I already answered your question,

1 sir, which was - -

2 Q No. I don't know who you spoke with at
3 Concordia. You have not answered.

4 MR. MCCARTHY: Answer it again, Ms.
5 Hornbeck. Detail - -

6 MR. REYES: No, don't answer it again.
7 Answer it for the first time. Who have you spoken to?

8 MR. MCCARTHY: Go ahead and answer again and
9 say who you didn't talk to at Concordia about this
10 particular case.

11 THE WITNESS: I have not spoken, to the best
12 of my recollection, with anyone at my son's school about
13 this frivolous, harassing, malicious prosecution case
14 that has no merit.

15 BY MR. REYES:

16 Q So you have not discussed this case with
17 anyone at Concordia Preparatory School. Correct?

18 A I already answered, sir.

19 Q And the answer is that you have not?

20 A Correct.

21 Q Thank you.

1 In your affidavit, that is part of your motion for
2 summary judgement, you stated repeatedly, that you were
3 terrified of Mr. Reichert. Do you recall that?

4 A Yes.

5 Q And we will put up your affidavit.

6 (Plaintiff Exhibit 9 was marked for
7 ID.)

8 BY MR. REYES:

9 Q So this affidavit, Ms. Hornbeck, that is part
10 of your motion for summary judgement filed against Jeff
11 Reichert mentioned, often times, that you were terrified
12 of him. And this case, in particular is about five
13 instances which are the dates that we have discussed in
14 July and August of 2020. Is that correct?

15 A Correct.

16 Q Now, I want you to identify what
17 communications or what conduct of Jeff Reichert after
18 July 11, 2020, up until August 21, 2020, in that span
19 only, terrified you?

20 A Mr. Reichert is a terrifying individual with
21 a long history of abuse against me and my son and any

1 communications or any dealings with Mr. Reichert are
2 terrifying to me.

3 Q So even if he says, 'Hello, Sarah,' you are
4 terrified?

5 A Yeah, pretty much.

6 Q Okay; thank you.

7 In your answers to interrogatories, at
8 interrogatory number 16, you claimed extensive emotional
9 harm. And I think that I asked you early on what was
10 that emotional harm. And I believe that you answered,
11 "anxiety." Is that accurate?

12 A My apologies, Mr. Reyes. I missed a word you
13 said. You believe I answered what?

14 Q Yes. In your answers to interrogatories, at
15 interrogatory number 16, you claim extensive emotional
16 harm. Do you recall that?

17 A Yes.

18 Q Okay. And I believe that I asked you early
19 on today what... to please describe that extensive,
20 emotional harm. And I also believe that you answered
21 anxiety. And now, I am asking you - -

1 A That's the word I don't understand.

2 Q You don't understand anxiety?

3 A Oh, anxiety. Yes, yes.

4 Q Okay. So I am asking you what was the
5 extensive, emotional harm; what is it? What does it
6 include?

7 A I already answered that question previously
8 in this deposition.

9 Q Which is anxiety. Correct?

10 A Partially. But I have - -

11 Q What else?

12 A I am not going to answer further.

13 Q Okay.

14 Do you hold resentment or ill will toward Mr.
15 Reichert since your divorce?

16 A I do not.

17 Q Do you hold any resentment or ill will toward
18 Mr. Reichert?

19 A I do not.

20 Q Were the charges, I am talking about the
21 applications for statement of charges that we are

1 discussing in this lawsuit, I mean this deposition, the
2 five instances, how were they resolved?

3 A I don't know.

4 Q Were they dismissed?

5 A I don't know.

6 Q Were they resolved in Mr. Reichert's favor?

7 A I don't know.

8 Q You don't know or you don't remember?

9 A I don't know.

10 Q And you don't know because you never knew or
11 because you forgot?

12 A I don't know. I never knew.

13 Q You never knew what was the outcome of those
14 charges you filed?

15 A No.

16 Q Okay.

17 A I - - truthfully and honestly, I made my five
18 statements that we have discussed at length today and
19 based on my statements it is my understanding the State's
20 Attorney would make a decision to proceed or not proceed
21 with charges against Mr. Reichert. Whether they

1 proceeded on each of those occasions, I don't know and
2 how those... any cases they may have brought were
3 resolved; I don't know.

4 Q So you don't know the final disposition of
5 each of those five cases initiated by you against Mr.
6 Reichert?

7 A Correct. I believe in your pleadings, you
8 have indicated they were either dropped or dismissed, but
9 that comes from you. So I don't know.

10 Q Okay. Have you initiated any additional
11 protective order or criminal complaints against Mr.
12 Reichert since August of 2020?

13 A I have; yes.

14 Q How many?

15 A Two.

16 MR. MCCARTHY: What are the nature of those,
17 Ms. Hornbeck? Be more specific.

18 THE WITNESS: Certainly. Uh, on two
19 occasions - -

20 BY MR. REYES:

21 Q No, no, no. There is no question pending.

1 There is no question pending. Thank you.

2 A Since 2020, in the past six years, two, I
3 believe.

4 Q You said that you or your lawyer recently
5 filed your... a log of calls from your phone; correct?

6 A I know... I believe what I said was that in
7 response to a subpoena, my phone carrier recently
8 provided a document. So either I would update my
9 discovery responses to you, if I have not already.

10 Q Okay.

11 MR. REYES: Can we take a break. I need
12 about ten minutes.

13 MR. MCCARTHY: Okay.

14 MR. REYES: Thank you.

15 (Whereupon, at 1:17 o'clock p.m., a break
16 was taken, afterwhich the following occurred at 1:27
17 o'clock p.m.

18 MR. REYES: We were not able to examine Ms.
19 Hornbeck under the terms that we expected with her on
20 camera so we could verify that she was alone in her
21 room, which we have not been able to do. With that

1 said, I am done for today.

2 CROSS EXAMINATION:

3 BY MR. MCCARTHY:

4 Q Ms. Hornbeck, you mentioned that in the past
5 few years, you have brought two actions against Mr.
6 Reichert. Is that correct?

7 A Correct.

8 Q What are the nature of those actions?

9 A Uh, again ceasing the court - -

10 Q Are they criminal or civil?

11 A Oh, protective orders; civil.

12 Q Okay. And have they been able to serve Mr.
13 Reichert?

14 A No. Over the course of the past,
15 approximately two years, he has evaded service.

16 Q On 12-2-2025, did Mr. Reichert name you as a
17 defendant in a declaratory judgement action in the
18 Circuit Court for Baltimore County, Maryland?

19 A Yes.

20 MR. REYES: Objection; form. Per the
21 court's order, that question is not related to this

1 litigation. It is outside the scope.

2 BY MR. MCCARTHY:

3 Q You can answer, ma'am.

4 A Yes.

5 Q And on, uh, let's see here, 5-22-2025 did Mr.
6 Reichert name you as an appellee in an appellate court of
7 Maryland case for an appealed civil case?

8 MR. REYES: Objection; form. And it is
9 immaterial. It is irrelevant to this case and it is
10 contrary to the court's order that the questions have to
11 be related to the issues in the complaint and answer in
12 this litigation.

13 MR. MCCARTHY: This goes to good faith and
14 credibility, Counsel.

15 BY MR. MCCARTHY:

16 Q Go ahead and answer, ma'am.

17 A Yes.

18 Q And in... on 12-18-2024, did Mr. Reichert
19 name you as a defendant in an emancipation case where he
20 voluntarily waived his parental rights?

21 MR. REYES: Objection; form. Outside the

1 scope of the discovery allowed in this litigation.

2 MR. MCCARTHY: Goes to credibility, Counsel
3 and it also goes to the fact that you were asking
4 questions about child custody in your examination.

5 BY MR. MCCARTHY:

6 Q Ms. Hornbeck?

7 A Yes.

8 Q And that was later transferred to Anne
9 Arundel County?

10 A Yes.

11 Q And on 11-25-2024, was there a petition
12 brought for modification of custody by Mr. Reichert
13 transferred from Baltimore County in the Circuit Court
14 for Anne Arundel County?

15 MR. REYES: Objection - -

16 THE WITNESS: Yes.

17 MR. REYES: - - form and lack of relevance.
18 This line of questioning is outside the scope that the
19 judge allowed us to question upon.

20 MR. MCCARTHY: Goes to credibility, Counsel.

21 BY MR. MCCARTHY:

1 Q Go ahead, Ms. Hornbeck.

2 A Yes.

3 Q And on 9-19-2024, did Mr. Hornbeck (Sic) name
4 you in a domestic violence case transferred from
5 Baltimore County to Anne Arundel County?

6 MR. REYES: Objection; form.

7 THE WITNESS: Yes.

8 MR. REYES: The line of questioning is
9 unrelated to this litigation; totally outside the scope
10 of what the court allowed us to question this witness
11 on.

12 MR. MCCARTHY: I note your continuing
13 objection, Counsel. This goes to credibility.

14 BY MR. MCCARTHY:

15 Q Go ahead, ma'am.

16 MR. REYES: Whose credibility?

17 MR. MCCARTHY: Mr. Reichert's.

18 BY MR. MCCARTHY:

19 Q Go ahead.

20 A Yes, Mr. McCarthy, although I, um, the
21 parties, Mr. Reichert is the one who brought the case.

1 You may have mixed... names may have been mixed - -

2 Q Yeah. He named you as a defendant in that
3 particular matter?

4 A Yes.

5 MR. REYES: Objection, same... I am
6 objecting to this entire line of questioning.

7 MR. MCCARTHY: Thank you, Counsel.

8 MR. REYES: All of this is outside the
9 scope.

10 BY MR. MCCARTHY:

11 Q Ma'am, did that resolve in your favor?

12 A Yes.

13 Q Did Mr. Reichert bring criminal charges
14 against you in the District Court of Maryland, for
15 Baltimore County for allegedly violating the temporary
16 protective order?

17 A Yes.

18 MR. REYES: Same objection. Standing
19 objection.

20 BY MR. MCCARTHY:

21 Q Did that resolve in - -

1 MR. MCCARTHY: Thank you, sir.

2 BY MR. MCCARTHY:

3 Q Did that resolve in your favor, ma'am?

4 A Yes.

5 Q Did Mr. Reichert bring criminal charges
6 against you in August of 2020 in the District Court for
7 Baltimore City?

8 A Yes.

9 Q Did that resolve in your favor?

10 A Yes.

11 Q Did Mr. Reichert, has he brought... I
12 believe I count six separate appeals of decisions by
13 courts against you.

14 A Yes; I believe so. I believe they - -

15 Q Have they resolved, have they, at least since
16 2020 have they resolved in your favor?

17 A Yes.

18 Q How many cases are you defending against by
19 Mr. Reichert, without naming them, obviously, in the U.
20 S. District Court for the District of Maryland currently?

21 MR. REYES: Same objection.

1 THE WITNESS: I believe currently, three.

2 BY MR. MCCARTHY:

3 Q Is Mr. Reichert a vexatious litigant in your
4 mind?

5 A Yes.

6 MR. REYES: Objection; form.

7 BY MR. MCCARTHY:

8 Q Let me see. On 10-30-2020, did Mr. Reichert
9 bring a domestic violence claim against you in the
10 Baltimore City Circuit Court?

11 A Yes. He did.

12 Q Was that transferred to Anne Arundel County
13 on 11-16-2020?

14 A Yes.

15 Q Did he dismiss that case when it came up for
16 a hearing?

17 A Yes.

18 MR. REYES: Object; same objection.

19 Standing objection, Court Reporter.

20 BY MR. MCCARTHY:

21 Q Now, did he do that when he was - - on

1 10-30, was he supposed to produce the child for
2 visitation?

3 A Correct.

4 Q Did he produce the child for visitation?

5 A No, he did not.

6 Q From 7-9-2020 through February 2nd, 2022, did
7 Mr. Reichert produce the child for every other weekend
8 visitation as ordered by any court voluntarily?

9 A He didn't. He did not.

10 Q And his communications with you, were any of
11 them, during that period to facilitate, to your
12 knowledge, visitation between you and Grant?

13 A Not at all.

14 Q Okay.

15 MR. MCCARTHY: I have no further questions,
16 Counsel.

17 MR. REYES: Okay. I need a minute.

18 (Pause)

19 REDIRECT EXAMINATION:

20 BY MR. REYES:

21 Q Ms. Hornbeck, has Mr. Reichert seen his son

1 since February 2, 2022?

2 A No. I don't believe so.

3 Q Okay.

4 A Oh, wait. Let me... I am sorry. I am trying
5 to... February of 2022. Yes, he has; apologies.

6 Q How many times?

7 A Um, to the best of my recollection, one time
8 he... in September of 2022 had supervised visitation with
9 our son where he was ordered by the court to not discuss
10 the case. We are actually in the middle of a two week
11 custody trial. Um, and in fact, he had Mr. Wayne
12 Doltrafino (ph) interview on camera our son about the
13 case, which he later published. So to my knowledge, he
14 has not seen my son since that time, except for that
15 occasion and this past Fall appearing at a football game
16 in violation of the court's custody order which currently
17 allows supervised phone contact, but not in-person
18 contact.

19 Q Okay.

20 MR. REYES: That is all I have. Thank you.

21 MR. MCCARTHY: Thank you very much. You

1 know the deal, Ms. Hornbeck. You can waive reading or
2 you can read and correct any minor mistakes. You can't
3 change really substantively, any of your deposition.

4 THE WITNESS: I think I would like to go
5 ahead and read it.

6 MR. MCCARTHY: Okay. Read and sign then.

7 (Whereupon, the deposition was concluded at 1:40
8 o'clock p.m.)

9 (By stipulation of counsel, in the
10 Presence of the witness, Reading and
11 Signature was NOT waived.)

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CERTIFICATE OF NOTARY PUBLIC/REPORTER

I, Sharon L. Banks, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me, that the testimony of said witness was taken by me in stenotype, at the time and place mentioned in the caption hereof and thereafter reduced to typewriting under my supervision, that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition is taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

My Commission Expires
September 1, 2027

Sharon L. Banks, C.R.
Notary Public in and for

THE STATE OF MARYLAND

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SIGNATURE PAGE

I have read the 144 pages, which contain a correct transcript of the answers made by me to the questions therein recorded.

Signature

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