

**DELL LAW FIRM**  
Matthew T. Boyer, Esquire  
Attorney I.D. No. 87567  
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Lancaster, PA 17601  
(717) 581-0620

Attorneys for Plaintiff

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

CHRISTOPHER B. YOUNG,	:	
Plaintiff,	:	
	:	
V.	:	No.: CI-18-04369
	:	
ROBIN A. HORNER,	:	
Defendant.	:	

**NOTICE TO DEFEND**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lancaster Bar Association  
Lawyer Referral Service  
28 East Orange Street  
Lancaster, PA 1760  
Telephone: 717-393-0737



5. Venue is appropriate in this Court pursuant to Pa. R.C.P. No. 1006, because the transactions and occurrences that gave rise to the cause of action asserted in this Complaint arose in this County.

### **BACKGROUND INFORMATION**

6. Defendant Horner is the estranged mother of Plaintiff Young's girlfriend and the grandmother of Plaintiffs' daughter, Reagan Horner.

7. On or around September 2017, Defendant Horner filed a complaint with the East Earl Township Police Department ("complaint"), as well as other police departments, against Plaintiff Young.

8. It is believed and therefore averred that Defendant Horner made allegations in the complaint that Plaintiff Young purposefully and illegally searched vehicle registrations and drivers' license information of Defendant Horner's and Defendant's daughter's friends and visitors to her home on a police database.

9. These allegations are false and without foundation.

10. It is believed and therefore averred that the East Earl Township Police Department referred this complaint to the Pennsylvania State Police for investigation into improper access to vehicle registration and driver license information.

11. It is believed and therefore averred that the Pennsylvania State Police investigation found that Plaintiff Young did not, in fact, access any vehicle registrations or driver license histories improperly.

12. It is believed and therefore averred that Defendant Horner also made knowingly false allegations with actual malice in the complaint that Plaintiff Young stalked and harassed her at her residence and her place of employment.

13. These allegations are also false and without foundation.

14. It is believed and therefore averred that Defendant Horner made these complaints for the purpose of defaming Plaintiff Young.

15. It is believed and therefore averred that damage to Plaintiff Young's reputation as a police officer was done based on Defendant's false allegations filed with his police department alleging this impropriety.

**COUNT 1**  
**DEFAMATION**

16. Paragraphs 1 through 15 are incorporated by reference as if fully set forth herein.

17. Defendant Horner has acted in a defamatory manner against Plaintiff Young by:

a) Filing a false complaint with the East Earl Township Police Department, alleging that he had improperly and illegally accessed vehicle registration and driver license information; and

b) Filing a false complaint with the East Earl Township Police Department, alleging that he stalked and harassed Defendant Horner at her residence and place of employment.

18. As a direct and proximate result of Defendant Horner's defamatory statements, Plaintiff Young has suffered significant reputational damage within his department and will continue to suffer reputational damage in the future based on Defendant Horner's complaint being part of his permanent employment record that will follow him through his career carrying negative connotations that could meaningfully impact his career path and promotion potential especially in the context of going to another agency.

**WHEREFORE**, Plaintiff Young demands judgment in his favor and against Defendant Horner in an amount in excess of \$50,000 and punitive damages, plus attorney's fees, and any

other relief that this Court deems appropriate under the circumstances.

**COUNT II**  
**ABUSE OF PROCESS**

19. Paragraphs 1 through 18 are incorporated by reference as if fully set forth herein.

20. Defendant Horner committed an abuse of process against Plaintiff Young by:

a) Filing a false complaint with the East Earl Township Police Department for wrongful purposes, alleging that he had improperly and illegally accessed vehicle registration and driver license information; and

b) Filing a false complaint with the East Earl Township Police Department for wrongful purposes, alleging that he stalked and harassed Defendant Horner at her residence and place of employment.

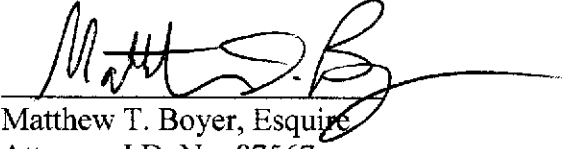
21. As a direct and proximate result of Defendant Horner's abuse of process, Plaintiff Young has suffered significant reputational damage within his department and will continue to suffer reputational damage in the future based on Defendant Horner's complaint being part of his permanent employment record that will follow him through his career carrying negative connotations that could meaningfully impact his career path and promotion potential especially in the context of going to another agency.

**WHEREFORE**, Plaintiff Young, demands judgment in his favor and against Defendant Horner in an amount in excess of \$50,000 and punitive damages, plus attorney's fees, and any other relief that this Court deems appropriate under the circumstances.

Date: 9/13/18

Respectfully Submitted,

DELL LAW FIRM

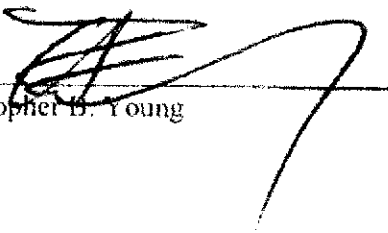
  
Matthew T. Boyer, Esquire  
Attorney I.D. No. 87567

Attorney for Plaintiff

**VERIFICATION**

I, Christopher B. Young, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

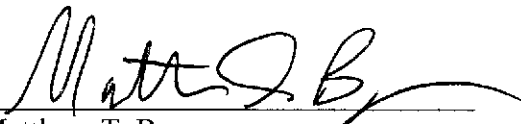
Date: 9-11-15

  
\_\_\_\_\_  
Christopher B. Young

**CERTIFICATE OF COMPLIANCE**

Docket No: CI-18-04369

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

  
Matthew T. Boyer  
Attorney No. 87567



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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the following person(s) and in the following manner, which service satisfies the requirements of the Pennsylvania Rules of Civil Procedure.

**VIA REGULAR MAIL TO:**

Curtis C. Johnston, Esquire  
Bennett, Bricklin, and Salzburg, LLC  
1850 William Penn Way, Suite 208  
Lancaster, PA 17601

DELL LAW FIRM

Date: 9-13-18

BY: Heather Herman  
Heather Herman  
Office Manager & Paralegal