

**IN THE CIRCUIT COURT OF GARLAND COUNTY, ARKANSAS
DOMESTIC RELATIONS DIVISION**

JAIME T. PHILLIPS,	)	
<i>Petitioner,</i>	)	
v.	)	CASE NO. 26DR-26-51
JONATHAN L. RICHES,	)	
<i>Respondent.</i>	)	

**RESPONDENT’S MOTION TO ENFORCE AND TERMINATE AGREED ORDER,
FOR ORDER TO SHOW CAUSE, AND FOR CIVIL CONTEMPT**

COMES NOW the Respondent, Jonathan L. Riches, appearing *pro se*, and moves the Court to enforce and terminate the Agreed Order entered March 30, 2026, and to issue an order directing Petitioner Jaime T. Phillips to appear and show cause why she should not be held in civil contempt. This Motion is based upon the Court’s Agreed Order and the exhibits attached hereto, and in support thereof Respondent states as follows:

I. THE AGREED ORDER

1. On March 30, 2026, the Court entered an Agreed Order in this case. The Order provides that the mutual no-contact provisions remain in effect for three years from entry and authorizes an aggrieved party to petition the Court for appropriate relief if either party violates the Order:

A No Contact Order shall be in full force and effect for a period of three (3) years . . . If there are issues, or either party violates this Order, the aggrieved party may petition the Court for appropriate relief.

2. Paragraph 4 prohibits each party from attempting to contact, monitor, harass, annoy, intimidate, threaten, or interfere with the other party, directly or indirectly. Paragraph 5 separately prohibits either party from using, requesting, directing, encouraging, or permitting a third person to contact the other party or relay messages:

Each party is further ORDERED not to attempt to contact, monitor, harass, annoy, intimidate, threaten, or interfere with the other Party, either directly or indirectly. . . .

Neither party shall use, request, direct, encourage, or permit any third person to contact the other party, to relay messages to or from the other party

3. Paragraph 10 reserves the Court's continuing jurisdiction to enforce the Agreed Order and advises that refusal to abide by it may result in contempt proceedings:

This Court maintains continuing jurisdiction over this matter and the parties hereto for the purposes of enforcing its orders. Refusal by either party to abide by the orders contained herein can and will result in the institution of contempt proceedings

II. EVIDENCE REQUIRING AN EVIDENTIARY HEARING

4. Respondent submits Google account device information identifying a Motorola moto g stylus 5G-2025 as a device with account access. The screen identifies [REDACTED] lists a first sign-in of December 27, 2025; lists activity on August 8; and identifies Android device and Chrome WebView under "Browsers, apps, and services." See Exhibit B:

moto g stylus 5G - 2025 / [REDACTED] Activity: August 8, 6:24 PM /
Signed out / First sign-in: Dec 27, 2025

5. Respondent also submits a Google Find Hub screen for that device. The screen states "Last seen just now," identifies the wireless network as "[REDACTED]" and displays a map centered on a single residential parcel in [REDACTED] Exhibits C and D:

moto g stylus 5G - 2025 / Last seen just now / [REDACTED] / 38% / Map / [street name redacted] / [street name redacted] / [parcel numbers redacted]

6. A June 14, 2026 SunPass notice addressed to "JAIME PHILLIPS" states that the address on that account was updated to an address in [REDACTED] Exhibit E:

Dear JAIME PHILLIPS, / The address on your account was automatically updated . . .
[address redacted]

7. Respondent alleges that he did not authorize Petitioner to access his Google account; that Petitioner maintained access to that account through the Motorola reflected in the Google records; and that, by maintaining that access after entry of the Agreed Order, Petitioner kept Respondent under surveillance in violation of Paragraph 4's prohibition against directly or

indirectly monitoring him. Respondent removed the device from his account after discovering it.

8. Respondent alleges that Petitioner's access to his Google account made Respondent's device-location information available through Google's location services. When Respondent used Google Find Hub after discovering the Motorola, the service displayed the Motorola as "Last seen just now" and showed a location at the residential parcel depicted in Exhibits C and D. The SunPass notice identifies Jaime Phillips at that same address. *See* Exhibits C, D, and E.

9. Respondent alleges that Petitioner added telephone number [REDACTED] to Respondent's Google account. Google Subscriber Information identifies that number among the user phone numbers associated with the account. *See* Exhibit F. Petitioner's telephone number is not publicly displayed in this case, and Respondent therefore requests that the Court compare that number against Petitioner's confidential contact information maintained in the court file:

[REDACTED]

10. Petitioner's possession or use of the device, the authorization issue, the alleged addition of the telephone number, and the meaning of the location information are disputed factual issues for an evidentiary hearing. Respondent does not ask the Court to resolve those issues on the face of this Motion.

III. APPLICABLE LAW

11. Arkansas Code Annotated section 16-10-108(a)(3) authorizes a court of record to punish the willful disobedience of any process or order lawfully issued or made by it as contempt. For contempt occurring outside the court's immediate view and presence, the party charged must be notified of the accusation and given a reasonable time to make a defense. Ark. Code Ann. § 16-10-108(a)(3), (c).

12. Civil contempt protects the rights of private parties by compelling compliance with orders of the court made for the benefit of private parties, and is coercive rather than punitive. *Omni Holding & Dev. Corp. v. 3D.S.A., Inc.*, 356 Ark. 440, 448, 156 S.W.3d 228, 234 (2004). Willful disobedience of a valid order is contemptuous behavior, but before a party may be held in contempt the order must be definite in its terms and clear as to what duties it imposes. *Id.* at 449, 156 S.W.3d at 235; *see also Knesek v. Knesek*, 2023 Ark. App. 151, 662 S.W.3d 231.

13. A show-cause procedure gives the party charged notice of the specific accusation and an opportunity to be heard before any contempt determination is made. Ark. Code Ann. § 16-10-108(c); *see Valley v. Pulaski Cnty. Cir. Ct., Third Div.*, 2014 Ark. 112.

IV. REQUEST FOR ENFORCEMENT AND A SHOW-CAUSE HEARING

14. The Agreed Order expressly prohibits direct or indirect monitoring and interference. Respondent alleges that Petitioner kept him under surveillance by maintaining access to his Google account after March 30, 2026. Respondent further alleges that this access allowed Petitioner to obtain his location information, while also allowing Respondent, upon discovering the Motorola linked to his account, to use Google Find Hub to view information concerning the Motorola's reported location. The evidence and credibility issues must be resolved at a hearing.

15. Respondent's evidence and allegations warrant an evidentiary hearing to determine whether Petitioner had unauthorized access to Respondent's Google account after March 30, 2026, whether that access constituted monitoring or interference prohibited by Paragraph 4, and whether any violation was willful.

16. Respondent seeks civil, rather than criminal, contempt relief. He requests only coercive relief that Petitioner may satisfy through compliance with a clear order entered after notice and hearing. Respondent does not request that the Court impose an unconditional punitive fine or a determinate term of incarceration.

PRAYER FOR RELIEF

WHEREFORE, Respondent Jonathan L. Riches respectfully requests that the Court:

- A. Enforce the Agreed Order entered March 30, 2026;
- B. Terminate the Agreed Order entered March 30, 2026, without prejudice to Respondent's right to seek an order of protection or any other relief permitted by law;
- C. Issue an order directing Petitioner Jaime T. Phillips to appear and show cause why she should not be held in civil contempt for a willful violation of Paragraph 4 of the Agreed Order;
- D. Set an evidentiary hearing after Petitioner receives notice and a reasonable opportunity to respond;
- E. If the Court finds a willful violation after hearing, enter a coercive compliance order with a clear means for Petitioner to purge any civil contempt; and
- F. Grant such other and further relief as is just and proper.

Respectfully submitted,

/s/ Jonathan L. Riches

Jonathan Riches

Signer ID: SODVRFUL18...

JONATHAN L. RICHES

Respondent, *Pro Se*

EXHIBIT LIST

Exhibit A — Agreed Order entered March 30, 2026.

Exhibit B — Google account device-information screen for Motorola moto g stylus 5G-2025.

Exhibit C — Google Find Hub screen for Motorola moto g stylus 5G-2025.

Exhibit D — Enlarged map screen depicting the reported device location.

Exhibit E — SunPass notice dated June 14, 2026, addressed to Jaime Phillips.

Exhibit F — Google Subscriber Information records for account

[REDACTED] with IP activity entries geolocated to [REDACTED]
[REDACTED] highlighted.

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Respondent's Motion to Enforce and Terminate Agreed Order

EXHIBIT A

Agreed Order entered March 30, 2026

**In the CIRCUIT COURT of GARLAND COUNTY, ARKANSAS
Domestic Relations Division**

Jaime T. Phillips

PETITIONER

v.

Case No. 26DR-26-51

Jonathan L. Riches

RESPONDENT

AGREED ORDER

Now on this day came on to be heard Petitioner's Petition for Order of Protection and after an examination of the Pleadings, the mutual agreement of both parties, statements of counsel, and other matters and things appearing before the Court, from all of which, the COURT DOTH FIND:

1. A No Contact Order shall be in full force and effect for a period of three (3) years, and, so long as there are no issues and no contact between the parties during said three (3) year period, the Order shall expire three (3) years from the date this Order was entered. If there are issues, or either party violates this Order, the aggrieved party may petition the Court for appropriate relief.

2. During the three (3) year period referenced above, Respondent, Jonathan L. Riches, is prohibited from initiating any contact with Petitioner, Jamie T. Phillips, including but not limited to physical presence, telephonic, electronic, oral, written, visual, or video. Respondent shall not use a third party to contact Petitioner except by legal counsel or as authorized by law or court order.

3. During the three (3) year period referenced above, Petitioner, Jamie T. Phillips, is prohibited from initiating any contact with Petitioner, Jonathan L. Riches, including but not limited to physical presence, telephonic, electronic, oral, written, visual, or video. Petitioner shall not use a third party to contact Petitioner except by legal counsel or as authorized by law or court order.

4. Each party is further ORDERED not to attempt to contact, monitor, harass, annoy, intimidate, threaten, or interfere with the other Party, either directly or indirectly.

5. Neither party shall contact, harass, annoy, threaten, intimidate, disparage, or interfere with the other party, either directly or indirectly. Neither party shall use, request, direct, encourage, or permit any third person to contact the other party, to relay messages to or from the other party, or to make disparaging, derogatory, threatening, harassing, or defamatory statements regarding the other party. Any such conduct by either party or undertaken through a third party shall be deemed a violation of this Order by the party causing, requesting, directing, encouraging, or permitting the conduct.

6. Neither party shall make any public statements that reference, undermine, or disparage the other party, but would include, but is not limited to social media posts, interviews, or third-party communications.

7. The parties are prohibited from directing, encouraging, or knowingly benefiting from any third-party conduct that targets, harasses, or defames the other party.

8. The Court further finds that the parties possess both real property and personal property which will require identification, preservation, and disposition in the course of this action. All communications, negotiations, proposals, demands, inspections, exchanges of information, and arrangements concerning any real property or personal

property of the parties shall be conducted solely through counsel for the parties. Neither party shall communicate directly with the other party concerning the sale, transfer, possession, division, use, access to, removal, concealment, encumbrance, damage to, or other disposition of any real or personal property.

9. Absent further Order of the Court or written agreement of counsel, neither party shall sell, transfer, assign, encumber, conceal, damage, destroy, remove, or otherwise dispose of any real property or personal property in which either party claims an interest, except in the ordinary course of business or for ordinary and necessary living expenses.

10. This Court maintains continuing jurisdiction over this matter and the parties hereto for the purposes of enforcing its orders. Refusal by either party to abide by the orders contained herein can and will result in the institution of contempt proceedings up to and including body attachment.

IT IS SO ORDERED this ____ day of _____, 20 ____.

Circuit Judge

Date: _____

Drafted by:
Jamie C. Beal
Attorney for Respondent
Victory Law Firm, LLC
221 W. 2nd St., Ste. 427
Little Rock, AR 72201

Approved by:
Angela Echols
Attorney for Petitioner





Case Title: JAIME T PHILLIPS V JONATHAN L RICHES

Case Number: 26DR-26-51

Type: ORDER NO CONTACT

So Ordered

Kara Petro

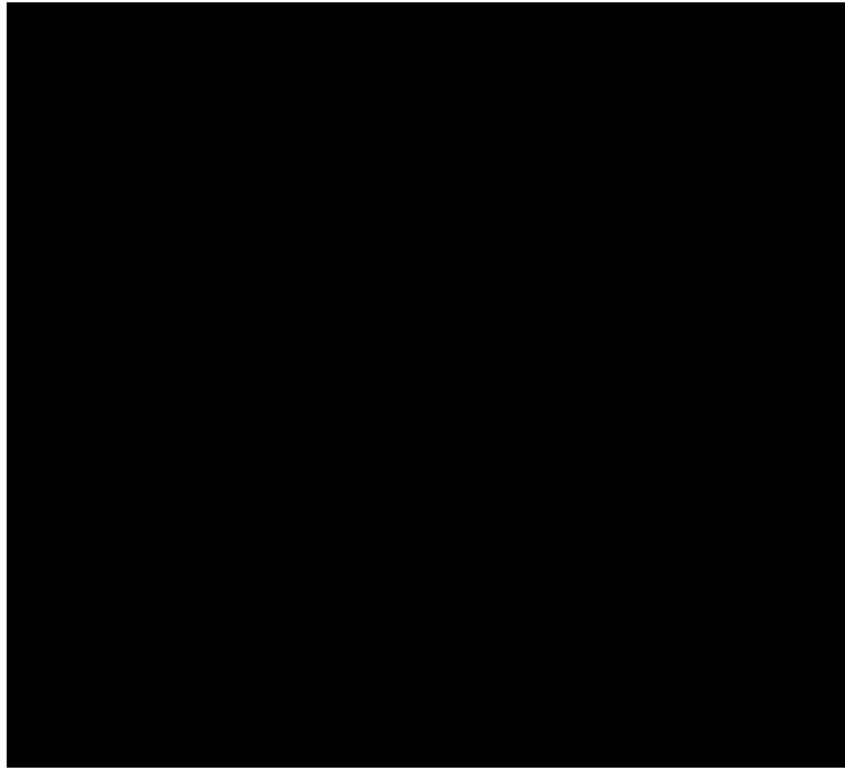
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EXHIBIT B

Google Account Device Information

Motorola moto g stylus 5G - 2025

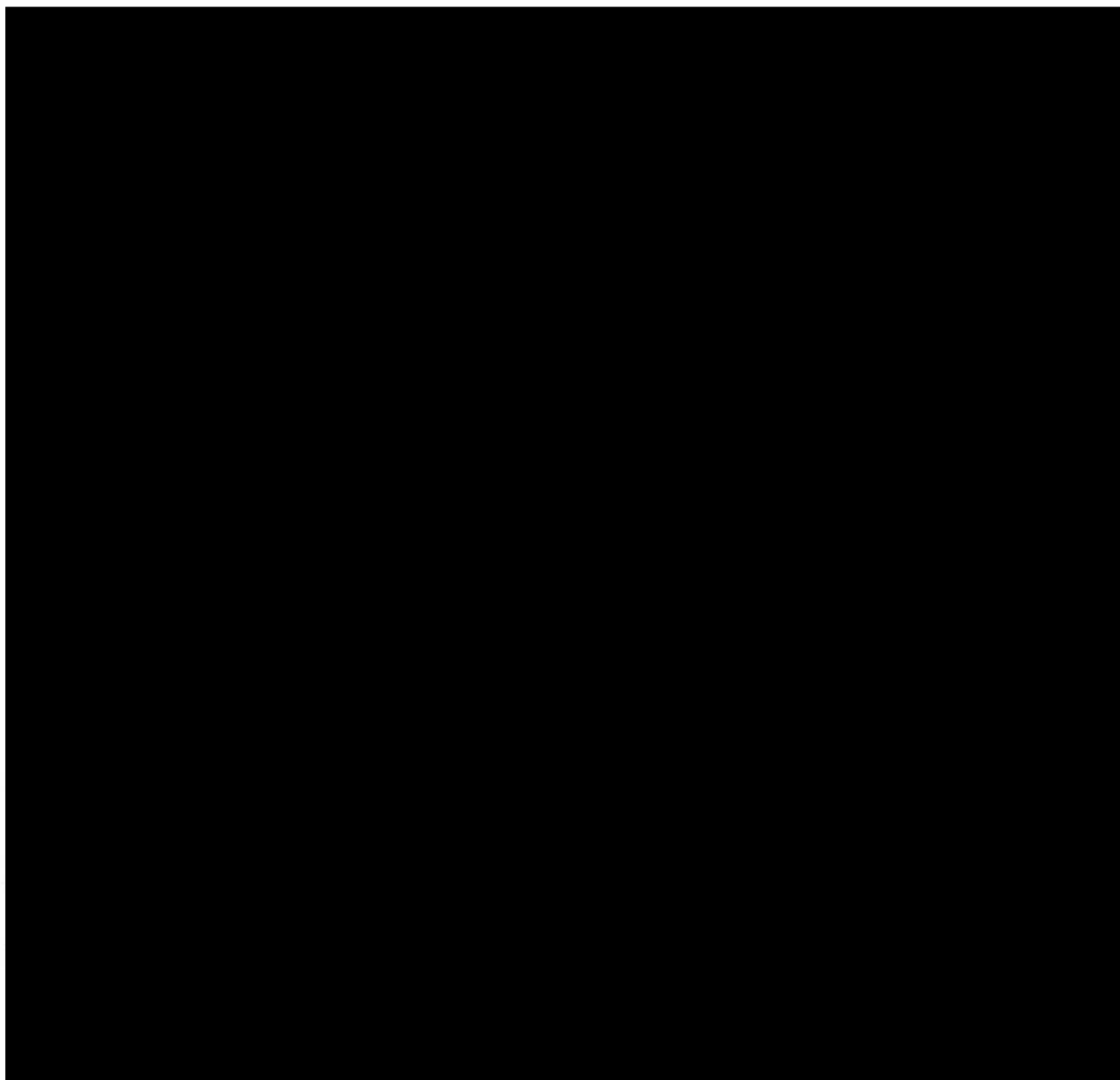
-activity%3Fgar%3DWzEyMF0%26continue%3Dhttps%3A%2F%2Fmyaccount.google.com%2Fu%2F2%2Fsecurity%3Fgar%253DWzEyMF0%2526hl%



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EXHIBIT C

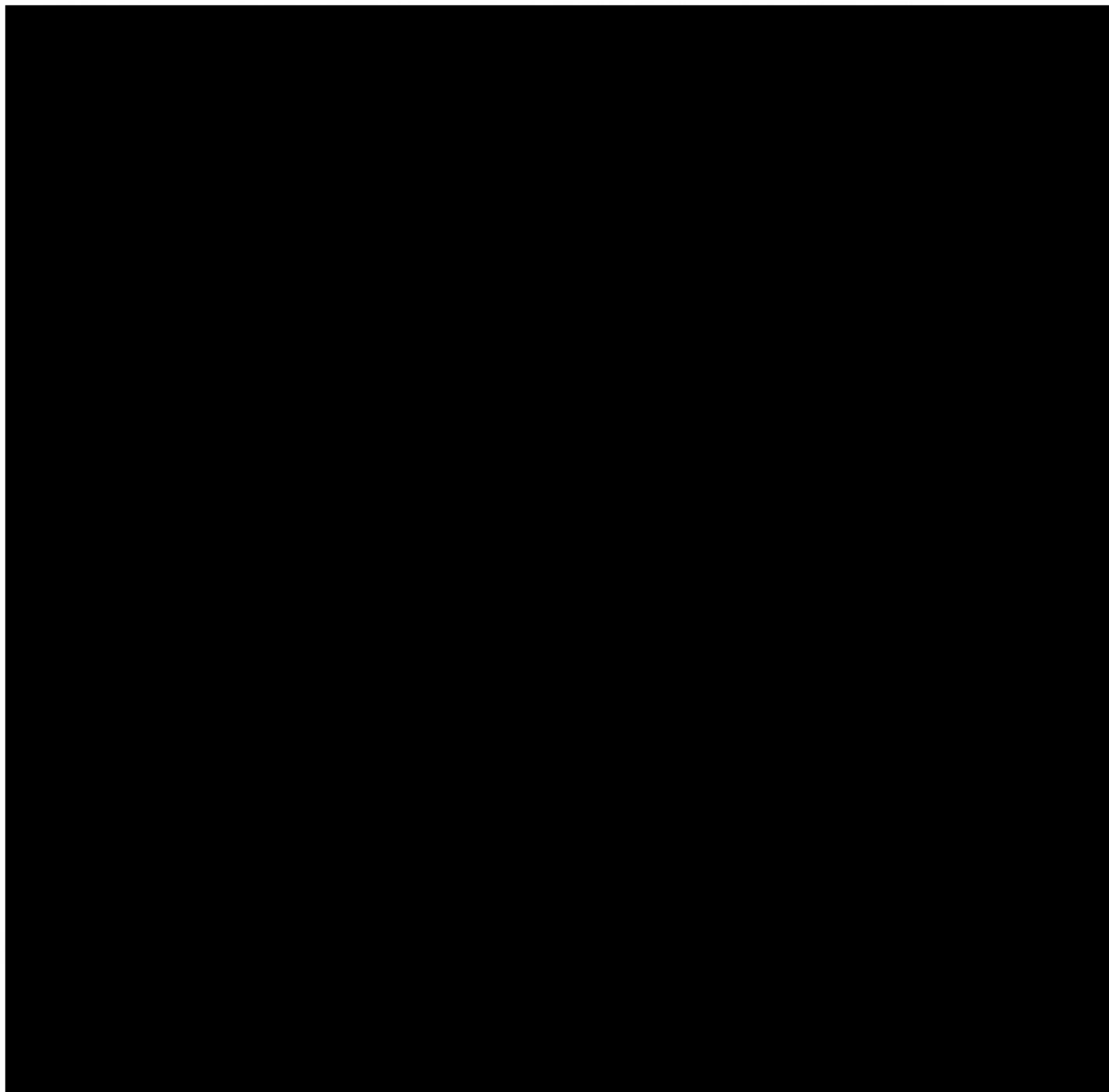
Google Find Hub Screen
Motorola moto g stylus 5G - 2025



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EXHIBIT D

Enlarged Map Screen



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EXHIBIT E

SunPass Notice dated June 14, 2026

Addressed to Jaime Phillips

Your Address Information Has Changed



June 14, 2026 5:32 PM

SunPass Customer Service

[Details](#)



Your Address Information Has Changed

Dear JAIME PHILLIPS,

The address on your account was automatically updated after receiving information from the USPS and/or an address service. The updated address is provided below.

REDACTED

If you have any questions or would like to update your address information, please login to your account at www.sunpass.com or call Customer Service at [1-888-865-5352](tel:1-888-865-5352).

Sincerely,

SunPass Customer Service Center

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EXHIBIT F

Google Subscriber Information

[REDACTED] ighlighted

REDACTED
LOCATION AND IP DATA

REDACTED
LOCATION AND IP DATA

REDACTED
LOCATION AND IP DATA

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LOCATION AND IP DATA

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<i>Respondent.</i>	)	

REQUEST TO THE CLERK FOR SERVICE ON PETITIONER

To the Clerk of the Court:

Petitioner's address is confidential in this matter. Respondent therefore does not state it in his filings and cannot mail service copies directly.

Respondent requests that the Clerk forward a copy of Respondent's Motion to Enforce and Terminate Agreed Order, for Order to Show Cause, and for Civil Contempt, together with the exhibits attached thereto, to Petitioner Jaime T. Phillips at the address listed with the Court.

Respectfully submitted,

/s/ Jonathan L. Riches

-

JONATHAN L. RICHES

Respondent, *Pro Se*