

# NOTICE OF INTENT TO FILE MOTION FOR PRESERVATION ORDER

\*\*IN THE UNITED STATES DISTRICT COURT\*\*

\*\*FOR THE DISTRICT OF MARYLAND\*\*

\*\*MARVIN TUTT\*\*

\*Plaintiff,\*

v.

\*\*STATE OF MARYLAND, et al.\*\*

\*Defendants.\*

\*\*Case No.: 8:25-cv-02006-TDC\*\*

---

## NOTICE OF INTENT TO FILE MOTION FOR COMPREHENSIVE PRESERVATION  
ORDER

Pursuant to the Case Management Order, Plaintiff provides notice of intent to file a Motion for Preservation Order to prevent destruction of critical evidence.

## ## EVIDENCE AT RISK

With employee buyouts creating mass exodus by August 4, 2025, the following evidence faces imminent destruction:

### ### Electronic Records

- Databases showing phantom \$82,000 income
- Garnishment calculation algorithms
- Source data for fraudulent computations
- Audit logs of database access/changes

### ### Communications

- Emails about co-plaintiff arrangement
- Internal discussions of Plaintiff's case
- Federal incentive payment negotiations
- Cross-agency coordination records

### ### Financial Records

- Title IV-D incentive payment applications
- Federal funding tied to Plaintiff's case
- Garnishment distribution records
- "Performance" bonuses from collections

## ## SPOILIATION CONCERNS

The day-after buyout announcement creates inference that State seeks to:

- Remove personnel with knowledge
- Destroy incriminating records
- Modify databases before discovery
- Eliminate evidence trails

## ## SPECIFIC PRESERVATION REQUIRED

1. **\*\*Complete litigation hold\*\*** on all records mentioning Plaintiff
2. **\*\*Mirror copies\*\*** of relevant databases as of June 23, 2025
3. **\*\*Email preservation\*\*** for all involved personnel
4. **\*\*Metadata preservation\*\*** for all electronic records
5. **\*\*Physical document\*\*** preservation

## ## GITFORENSICS MONITORING NOTE

Plaintiff employs GitForensics methodology (see [gitforensics.org](https://gitforensics.org)) for cryptographic verification of evidence. All behavioral patterns, including repository monitoring and evidence access, are being documented with mathematical proof of tampering detection.

## ## RELIEF TO BE SOUGHT

The Motion will request:

1. Immediate preservation order
2. Third-party custody of critical databases
3. Forensic imaging of relevant systems
4. Contempt sanctions for violations
5. Cost-shifting for preservation expenses

**\*\*Respectfully submitted,\*\***

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Email: owner@caiatech.com

**\*\*Date: July 15, 2025\*\***

---

**## CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2025, I served a true and correct copy of the foregoing NOTICE OF INTENT TO FILE MOTION FOR PRESERVATION ORDER upon the following parties via certified mail and first-class mail:

Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Charles County Department of Social Services

200 Kent Avenue

La Plata, MD 20646

State of Maryland

c/o Office of the Attorney General

200 Saint Paul Place

Baltimore, MD 21202

Charles County, Maryland

200 Charles Street

La Plata, MD 20646

Shara Gabrielle Hendler, Esq.

c/o Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Andrea Khoury

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

Mistey L. Metzgar

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Date: July 15, 2025