

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Southern Division

MARVIN TUTT,
Plaintiff,

Civil Action No. _____

v.

REGINA ROBINSON
CHARLES COUNTY CHILD SUPPORT ADMINISTRATION
CHARLES COUNTY DEPARTMENT OF SOCIAL SERVICES
CHARLES COUNTY, MARYLAND
STATE OF MARYLAND
SHARA GABRIELLE HENDLER, ESQ.
ANDREA KHOURY
MISTEY L. METZGAR
1-30 Jane/John Does And/Or Entities

Defendants.

Category 1: CONSPIRACY FORMATION (June 2022 - July 2022)

Critical Evidence (Rating 5):

- **June 17, 2022 Co-Plaintiff Filing** ★ - CSEA and Robinson filed as co-plaintiffs, unprecedented in Maryland history. No other case found with government agency as co-plaintiff with private citizen.
- **Shared Attorney Arrangement** ★ - Shara Gabrielle Hendler represented BOTH CSEA (government) and Robinson (private party) in same action. Ethically impossible without prior agreement.
- **Khoury's Immediate Assignment** ★ - Andrea Khoury left DSS (Jan 2013-2022), became magistrate, then presided over CSEA case July 28, 2022 - mere WEEKS after leaving DSS. Zero cooling-off period.
- **Hendler's Strategic Concealment** ★ - Attorney never appeared when Plaintiff present in court. Deliberate hiding of dual representation.

Supporting Evidence (Rating 4):

- Court docket showing co-plaintiff structure
- No statutory authority for co-plaintiff arrangement exists
- Hendler's withdrawal timing (after NGA garnishment failed)

- Pattern of predetermined outcomes from first hearing

Total Items: 8

Critical (5): 4 | High (4): 4

Key Connections: The unprecedented structure + immediate assignment of former DSS employee + shared attorney = pre-planned conspiracy

Smoking Guns: Co-plaintiff filing, Zero cooling-off period for Khoury

Category 2: FRAUDULENT REPRESENTATIONS

Critical Evidence (Rating 5):

- **Robinson's Serial Perjury on Custody** ★ - Claimed 7 nights/week custody under oath; actual custody 3-4 nights with paternal grandmother
- **Hidden Employment** ★ - Robinson concealed employment while claiming financial need
- **Phantom \$82,000 Income** ★ - CSEA used salary from job they COULDN'T garnish to calculate current garnishments
- **Benefits Fraud Coordination** - Robinson's lies protected by all magistrates despite proof

Supporting Evidence (Rating 4):

- Transcript contradictions within same hearing
- Grandmother would testify to actual custody arrangement
- No sanctions imposed for proven perjury
- Robinson's complete silence when fraud exposed in 2025
- Pattern of employment lies continuing after notice
- CSEA's failure to verify any claims despite resources

Total Items: 10

Critical (5): 4 | High (4): 6

Key Connections: Robinson's perjury enabled by court protection + phantom income across all systems

Smoking Guns: Provable perjury with transcripts, Protected despite exposure

Category 3: MATHEMATICAL IMPOSSIBILITIES

Critical Evidence (Rating 5):

- **\$138/week from \$430 Unemployment** ★ - Garnishment rate of 32%, only possible if calculated from \$82,000 salary
- **Federal Contractor Garnishment Failure** ★ - CSEA couldn't garnish NGA wages, yet uses that exact salary for current calculations
- **Year-Long Phantom Wage Pursuit** ★ - Attempted to garnish NGA wages from March 2024 to June 13, 2025, over a year after employment ended
- **Impossible Calculation Continues** ★ - Still garnishing at phantom rate AFTER federal court notification
- **"Legal Advice" Dismissal** ★ - June 17, 2025: Court refused to explain impossible math, calling question "seeking legal advice"

Supporting Evidence (Rating 4):

- Maryland law caps garnishment at 25% of disposable income
- NGA employment verification at \$82,000
- Weekly garnishment records showing consistent \$138
- No imputation hearing ever held
- Mathematical proof: $\$138 \div \$430 = 32\%$ (illegal rate)
- Court refused to modify phantom wage garnishment without CSEA approval
- CSEA demanded impossible "proof" of non-employment
- Circular bureaucracy: Court → CSEA → Impossible proof → No modification

Total Items: 11

Critical (5): 5 | High (4): 6

Key Connections: Failed garnishment at NGA → Phantom income in system → Current illegal calculations

Smoking Guns: Mathematical proof of using non-existent income, Continuing after exposure

Category 4: SYSTEMIC COORDINATION

Critical Evidence (Rating 5):

- **Multi-Agency Benefits Denials** ★ - UI, Medicaid, SNAP all denied based on same phantom \$82,000 income
- **Khoury's DSS-to-Court Pipeline** ★ - 9 years at DSS, immediate CSEA cases, no recusal
- **CSEA as Secret Prosecutor** ★ - Plaintiff sought help from CSEA, not knowing they were prosecuting him
- **Impossible Proof Loop** - Required unemployment proof → UI denied due to phantom income → No proof possible

Supporting Evidence (Rating 4):

- Timeline of synchronized denials across agencies
- Database access showing same phantom income
- Pattern of denials during case prosecution
- "6-month delay" tactic while arrears accumulated
- Cross-agency communication patterns
- Federal funding incentives driving coordination
- DSS training materials on maximizing collections

Total Items: 11

Critical (5): 4 | High (4): 7

Key Connections: DSS insider becomes magistrate → Coordinates with benefits denial → Creates impossible situations

Smoking Guns: Khoury's zero cooling-off period, Multi-agency phantom income

Category 5: CONSCIOUSNESS OF GUILT

Critical Evidence (Rating 5):

- **June 17, 2025 Email** ★ - Plaintiff asks how garnishment possible, dismissed as "seeking legal advice"
- **Continuing Post-Federal Notice** ★ - Still garnishing weekly AFTER federal lawsuit filed
- **Metzgar's Prejudgment** ★ - "You'll never get this terminated" stated BEFORE hearing evidence
- **Zero Investigation** ★ - No defendant investigated detailed fraud allegations

Supporting Evidence (Rating 4):

- Pattern of dismissing all motions without review
- False procedural claims (10-day limit that doesn't exist)
- Protecting Robinson's perjury after exposure
- Refusal to require Robinson to respond to fraud
- Continued garnishment after mathematical impossibility proven
- No correction of false court findings
- Deliberate mischaracterization of legitimate questions
- Institutional stonewalling of fraud exposure

Total Items: 12

Critical (5): 4 | High (4): 8

Key Connections: Prejudgment + Protection of fraud + Continuation after exposure = Knowledge of guilt

Smoking Guns: "You'll never get this terminated," Continuing theft after federal notice

Category 6: DAMAGES DOCUMENTATION

Critical Evidence (Rating 5):

- **Destroyed Pre-Med Education** ★ - Forced to abandon pre-med at College of Southern Maryland; 57 total credits earned now mostly toward software engineering at WGU
- **Weekly Ongoing Theft** ★ - \$138/week continuing through present (\$7,176/year)
- **Homelessness During Conspiracy** - Chose streets to avoid technical violations
- **Criminal Mandate Jeopardy** - 10-year backup time constantly threatened

Supporting Evidence (Rating 4):

- Education transcripts showing forced career change
- Garnishment records from 2022-present
- Mental health impacts (complex PTSD anticipated)
- Lost earning potential (doctor vs. forced career change)
- Corruption of educational/professional identity
- \$85,000 educational investment lost
- Credit destruction documentation
- License suspension impacts
- WebHead Technologies business losses
- Intergenerational trauma to child

Total Items: 14

Critical (5): 4 | High (4): 10

Key Connections: Education mandate made impossible → Forced into different career → Still being garnished illegally

Smoking Guns: Ongoing weekly theft, Pre-med dreams destroyed

EVIDENCE HIERARCHY - TOP 15 SMOKING GUNS

1. ★ **Co-plaintiff structure** - Government + private citizen, unprecedented in Maryland
2. ★ **Shared attorney** - Ethically impossible without conspiracy
3. ★ **Zero cooling-off** - Khoury: DSS → Magistrate → CSEA case in weeks
4. ★ **\$138 from \$430** - Mathematical impossibility proves phantom income
5. ★ **June 17, 2025** - "Legal advice" dismissal of fraud question
6. ★ **Continuing post-notice** - Still stealing after federal filing

7. ★ **"Never get terminated"** - Prejudgment before evidence
 8. ★ **Multi-agency phantom income** - Same false data across systems
 9. ★ **Robinson's protected perjury** - Proven lies, no sanctions
 10. ★ **NGA garnishment failure** - Yet using that salary now
 11. ★ **Secret prosecutor trap** - CSEA prosecuting while "helping"
 12. ★ **No investigation** - Detailed fraud allegations ignored
 13. ★ **Hendler's concealment** - Hidden from Plaintiff's view
 14. ★ **Benefits denial coordination** - Impossible proof requirements
 15. ★ **10-day procedure lie** - False deadline, no notice
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SUMMARY STATISTICS

Total Evidence Items: 66

- Critical (5): 25 items (37.9%)
- High (4): 41 items (62.1%)
- Medium or lower: 0 items

Strongest Categories:

1. Mathematical Impossibilities (100% critical/high)
2. Consciousness of Guilt (100% critical/high)
3. Conspiracy Formation (100% critical/high)

Key Pattern: Every category shows systematic coordination, not isolated incidents

Most Damning Connection: Former DSS employee (Khoury) + Unprecedented co-plaintiff structure + Mathematical fraud + Continuation after exposure = Organized conspiracy for federal funding

I declare under penalty of perjury that this evidence summary accurately reflects documents and facts within my personal knowledge.

Marvin Tutt

Date: _____

EXHIBIT B TO COMPLAINT IN TUTT v. ROBINSON ET AL., CASE NO. _____

