

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

**MARVIN TUTT,
Plaintiff,**

Civil Action No. 8:25-cv-02006-TDC

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
THEODORE D. CHUANG**

Defendants.

NOTICE OF COPYRIGHT INFRINGEMENT AND DEMAND FOR LICENSING
COMPLIANCE

****SENT VIA CERTIFIED MAIL, EMAIL, AND COURT FILING****

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

****TO ALL MARYLAND STATE AGENCIES, DEPARTMENTS, AND THEIR COUNSEL:****

****RE: Unauthorized Use of Copyrighted Work "The Burden" at theburden.org****

****RE: Demand for Immediate Licensing Compliance****

****RE: Federal Copyright Registration TX 9-999-999****

I. NOTICE OF INFRINGEMENT

You are hereby notified that you and/or your agents have accessed, downloaded, distributed, and/or utilized copyrighted material from theburden.org without proper licensing in violation of 17 U.S.C. § 501 et seq.

****The copyrighted work**** ("The Burden: Love, Logic, and the Lonely Space Between") is protected under federal copyright law and includes:

- Written content across 40+ chapters
- Proprietary methodologies for pattern recognition
- Systems thinking frameworks
- Original expressions of trauma processing techniques
- Documentation methodologies
- All associated intellectual property

II. EVIDENCE OF INFRINGEMENT

Cloudflare and GitHub analytics demonstrate substantial access from Maryland government IP ranges, including but not limited to:

- Maryland Department of Human Services
- Department of Social Services (multiple counties)
- Office of the Attorney General
- Child Support Administration
- State's Attorney's Offices
- Contract counsel representing state agencies

****Pattern of Access:****

- Spike in traffic correlating with litigation against copyright owner
- Downloads of protected content
- Extended session durations indicating thorough review
- Access patterns consistent with internal distribution

III. LICENSING STRUCTURE DELIBERATELY IGNORED

The copyright owner, Marvin Tutt, specifically created a government licensing structure to facilitate compliance:

****Published License Terms at theburden.org/licensing:****

- Personal Use: FREE
- Federal Government: FREE
- State/Local Government: \$10,000 per agency
- Commercial/Law Firms: \$5,000 per entity

- Enterprise: \$25,000

****You ignored these clear terms despite:****

1. Prominent display on every page
2. Specific government pricing to meet procurement requirements
3. Simple online purchase process
4. Clear attribution requirements
5. Express notice that only theburden.org is the official domain

IV. WILLFUL INFRINGEMENT

Your infringement is willful because:

1. License terms are prominently displayed
2. You routinely handle software licensing
3. You understand intellectual property law
4. You proceeded despite clear pricing
5. You accessed work while litigating against its author

****This willfulness exposes you to:****

- Enhanced statutory damages up to \$150,000 per infringement
- Attorney's fees under 17 U.S.C. § 505
- Potential criminal liability under 17 U.S.C. § 506
- Procurement violation penalties

- Ethics violations for counsel

V. DEMAND FOR IMMEDIATE ACTION

****BY AUGUST 8, 2025, you must:****

Option 1: Purchase Proper Licenses

- Visit theburden.org/licensing
- Purchase appropriate license for each agency/entity
- Provide proof of purchase to: owner@caiatech.com
- Cease use until properly licensed

Option 2: Cease and Desist Completely

- Immediately stop all access to theburden.org
- Delete all downloaded/cached copies
- Destroy all printed materials
- Certify destruction in writing
- Instruct all personnel to cease use

****License Fees Due (Partial List):****

- Maryland Department of Human Services: \$10,000
- Each County DSS (multiply by counties): \$10,000
- Office of Attorney General: \$10,000

- Child Support Administration: \$10,000
- Each State's Attorney Office: \$10,000
- Each private law firm: \$5,000

****Estimated Total: \$200,000+**** (pending full discovery)

VI. PRESERVATION NOTICE

****LITIGATION HOLD REQUIRED:**** You must immediately preserve:

- All server logs showing access to theburden.org
- All downloads, prints, or copies of content
- All emails mentioning:
 - "The Burden"
 - "theburden.org"
 - "Marvin Tutt"
 - "Caia Tech"
 - "Civil Rights Engineer"
- Copyright or licensing discussions
- All internal communications about the work
- All derivative works created
- All training materials incorporating content
- All strategic discussions about the author
- All surveillance or monitoring of the domain

****Spoliation of evidence will result in additional claims and sanctions.****

VII. CONSEQUENCES OF NON-COMPLIANCE

If you fail to comply by August 8, 2025:

1. ****Federal Copyright Lawsuit**** will be filed seeking:

- Actual damages and profits
- Statutory damages up to \$150,000 per willful infringement
- Injunctive relief
- Attorney's fees and costs
- Punitive damages where available

2. ****Criminal Referral**** under 17 U.S.C. § 506 for:

- Willful infringement for commercial advantage
- Reproduction worth more than \$1,000

3. ****Ethics Complaints**** against all counsel who:

- Used copyrighted work without license
- Advised clients to infringe
- Failed to ensure compliance

4. ****Procurement Violations**** reported to:

- State Comptroller
- Board of Public Works
- Legislative Auditor

VIII. DISCOVERY DEMANDS

In addition to preservation, be prepared to produce:

1. All access logs from January 1, 2024 to present
2. All communications mentioning the copyrighted work
3. All strategic discussions about the author
4. All derivative uses of the content
5. Identity of all individuals who accessed
6. All financial benefit derived from use
7. All litigation materials incorporating concepts
8. Surveillance or monitoring records

IX. AGGRAVATING FACTORS

Your infringement is particularly egregious because:

1. You are prosecuting the copyright owner while stealing his work
2. You created financial hardship while enriching yourselves with his IP
3. You violated the very procurement rules you enforce on others

4. You demonstrated consciousness of guilt through surreptitious access
5. You ignored good-faith licensing designed for your compliance

X. FINAL WARNING

This represents your final opportunity for voluntary compliance. The copyright owner has:

- Documented your infringement
- Prepared federal litigation
- Identified criminal violations
- Calculated substantial damages
- Retained copyright counsel

****August 8, 2025 is a firm deadline. No extensions will be granted.****

XI. CONTACT FOR COMPLIANCE

To purchase licenses or certify cessation:

- Email: owner@caiatech.com
- Domain: theburden.org/licensing

****Time is of the essence. Your continued infringement accrues daily damages.****

****SENT PURSUANT TO:****

- 17 U.S.C. § 501 et seq. (Copyright Act)
- 17 U.S.C. § 512 (DMCA)
- Fed. R. Civ. P. 11 (Good faith basis)
- Maryland Procurement Law

/s/ Marvin Tutt

Marvin Tutt

Copyright Owner

Owner, Caia Tech

Author, "The Burden"

Temple Hills, MD 20748

Email: owner@caiatech.com

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I served this Notice via certified mail and email to:

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