

**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.

VERIFIED COMPLAINT FOR DAMAGES ARISING FROM

GOVERNMENTAL CONSPIRACY TO VIOLATE CIVIL RIGHTS AND COMMIT FRAUD

THE TRUTH: THIS CASE IS SIMPLE

1. Despite the documentation that follows, this entire case may be summarized in one paragraph:

2. On June 17, 2022, a government agency did something that appears unprecedented in Maryland history: it filed as CO-PLAINTIFF with a private citizen, sharing the same attorney, to prosecute a father who was completing court-ordered education. This created a mathematical impossibility—he couldn't work full-time to pay support AND attend school full-time to complete his mandate. When he exposed their fraud, they didn't stop—they continued illegally punishing him and garnishing him weekly using phantom income from a job they mysteriously couldn't garnish when he actually worked there.

The Five Questions That Resolve Everything

3. Can a government agency file as co-plaintiff with a private citizen?

Answer: No. It violates due process, abandons governmental neutrality, and creates inherent conflicts.

4. Why did they do it?

Answer: To guarantee imprisonment and collect federal incentive payments, and satisfy personal goals.

5. How do we know it was intentional?

Answer: They continue collecting even after being caught. They relied on judicial immunity and deniability tactics to hide a criminal conspiracy. The detailed motions filed by the plaintiff prove that they knew it was fraud. Court transcripts prove that they have all been made aware of the fraud and human rights violations, and they refused to take the required legal steps to address said fraud. That is because they conspired everything from the very beginning, while feigning ignorance to the truth till this day.

6. What's the damage?

Answer: A destroyed medical career, forced career change under duress, ongoing weekly theft, a destroyed family, severe mental health implications, attempted 10-year false imprisonment, theft of federal funds, damage to reputation of citizens and government due to organized crime perpetuated across multiple government agencies and judicial systems, and more damage which is thoroughly detailed in these filings.

7. What makes this a conspiracy rather than error?

Answer: Multiple agencies coordinating, a magistrate fresh from the conspiring agency, and continuation after exposure.

What All the Documentation Proves

8. The Timeline: Shows coordination between agencies

The Emails: Prove knowledge and continuation of fraud

The Transcripts: Document lies told in court

The Damages: Calculate the destruction precisely

The Witnesses and Discovery: Will confirm each element

9. But none of that changes the simple truth: They filed as co-plaintiffs to destroy a father's court-ordered college education.

For the Court's Consideration

10. Don't let the volume of evidence obscure the simplicity of the wrong. When the government joins with a private citizen as co-plaintiff to prosecute someone, that alone shocks the conscience. Everything else is just proof of why they did it and how much damage it caused.

11. This isn't a complex case. It's a simple case with thorough documentation.

12. The relief sought is equally simple:

a. Stop the ongoing theft immediately

b. Compensate for the massive damage caused to Plaintiff

- c. Ensure this never happens to Plaintiff again
- d. Let the criminal authorities sort out the conspiracy

PLAINTIFF'S LIMITED PERSONAL OBJECTIVES

13. Plaintiff brings this action seeking personal relief from an extraordinary situation that destroyed his education and future. While evidence suggests systemic issues, Plaintiff is not positioning himself as a reformer, advocate, or representative for others.

14. Plaintiff simply wants:

- a. To stop the ongoing illegal garnishments
- b. Compensation for the specific harms suffered
- c. To complete his education without impossible mandates
- d. To move forward with his life

15. Any systemic benefits from this case are incidental to Plaintiff's personal need for justice and closure. Plaintiff has no desire to become a public figure, lead reform movements, or encourage widespread litigation. This is about one father trying to survive an impossible situation, not about saving the world.

DISTINCTION OF EXTRAORDINARY CIRCUMSTANCES

16. Plaintiff acknowledges his case presents unique circumstances distinct from typical child support matters. Unlike disputes involving hidden income or custody disagreements, Plaintiff was:

- a. Under criminal court mandate to complete education or face 10 years imprisonment

- b. Attempting to comply with Judge Carrington-Martin's rehabilitation order
- c. Caught between two government mandates creating mathematical impossibility
- d. Simply trying to earn a degree and avoid prison while supporting his child

17. Plaintiff does not challenge legitimate child support enforcement. Rather, this case addresses the weaponization of enforcement against someone desperately trying to comply with court-ordered rehabilitation. The reforms sought to protect Plaintiff from continued harm, not to undermine proper support collection.

18. Most parents can work full-time to pay support. Plaintiff uniquely could not without violating a criminal court order. This extraordinary circumstance, exploited through the unprecedented co-plaintiff arrangement, distinguishes this case from normal enforcement matters.

PLAINTIFF'S LITIGATION PREVENTION COMMITMENT

19. Despite uncovering evidence suggesting widespread systemic violations, Plaintiff does not seek to catalyze mass litigation. Instead, Plaintiff offers Defendants the opportunity to:

- a. Resolve this individual case while implementing quiet reforms
- b. Receive confidential notification of discovered vulnerabilities relevant to Plaintiff's case
- c. Prevent future litigation through proactive remediation
- d. Avoid becoming the target of class action attorneys
- e. Transform from litigation targets to reform leaders

20. Plaintiff believes resolving his case fairly while allowing Defendants to address vulnerabilities serves justice better than encouraging widespread litigation. This commitment is contingent upon good faith resolution of the instant case.

PRELIMINARY STATEMENT

21. This case presents an unprecedented question: Can a government agency and private citizen file as CO-PLAINTIFFS to prosecute a criminal defendant whose court-ordered rehabilitation they seek to destroy for profit?

22. On June 17, 2022, Charles County Child Support Administration ("CSEA") did something that has never occurred in Maryland history: it filed as CO-PLAINTIFF with Regina Robinson, sharing the same attorney, to prosecute a father under a criminal rehabilitation mandate to obtain a bachelor's degree (See Exhibit B, Category 1). This wasn't child support enforcement—this was the weaponization of government power to create an impossible trap.

23. The trap was mathematical and inescapable. In December 2019, Judge Carrington-Martin ordered Plaintiff to complete a bachelor's degree within 5 years or serve 10 years in prison. The co-plaintiff prosecution demanded full-time work to pay support inflated by fraud. Both cannot be done simultaneously. The impossibility guaranteed imprisonment regardless of Plaintiff's choices (See Exhibit B, Category 3).

24. The evidence will show this was not an error but design (See Exhibit B, containing 64 documented items of evidence, 100% rated as critical or high importance). Magistrate Andrea Khoury, who presided over the case, had just transitioned from 9 years at the Department of Social Services—CSEA's parent agency—with zero cooling period (See Exhibit B-1, Smoking Gun #3). The co-plaintiff structure was adopted specifically because Plaintiff's situation was unique: a criminal defendant required to complete education or face a decade in prison.

25. When Plaintiff exposed the fraud in court filings in 2025, Defendants didn't investigate or correct—they continued collecting (See Exhibit B, Category 5). As this complaint is filed, they still garnish wages weekly based on fraud they know is fraud, using phantom income from employment they couldn't garnish (See Exhibit B-1, Smoking Gun #10). The June 17, 2025 email exchange proves they know exactly what they're doing (Exhibit A).

26. Defendants calculated that Plaintiff would fail, go to prison, and never discover their scheme. They would collect from his prison wages for 10 years, then garnish his post-release earnings for another 20 years—generating federal Title IV-D incentive payments from human destruction. They underestimated him.

27. This Court must answer: Can government agencies conspire with private citizens to destroy court-ordered rehabilitation for profit? Can they continue stealing even after federal court exposure? The ongoing weekly garnishments make these questions urgent—every week of delay is another week of theft from Plaintiff.

28. Plaintiff seeks \$120,000,000 in compensatory damages and \$1,080,000,000 in punitive damages, totaling \$1,200,000,000, along with injunctive relief to stop the ongoing conspiracy against him.

A NOTE ON THE DAMAGES AMOUNT

The Unthinkable Reality

29. This Court may question the damages sought. The amount reflects a simple truth: when courts themselves perpetrate extrinsic fraud, when magistrates violate constitutional rights as a matter of course, when the very institutions meant to protect citizens become the instruments of their destruction—the harm transcends normal measurement.

What Changes When Courts Conspire

30. I spent years believing my struggles were my own failures. Emergency room visits. Cardiac symptoms from desperately trying prescribed Adderall when I broke down, unable to complete online coursework no matter how hard I tried. The medication was ineffective and dangerous—I never should have needed it. But I thought something was wrong with ME. I blamed myself.

31. During a global pandemic, while the world shut down, I was forced to work AND study simultaneously to avoid a decade in prison. Programming—something I'd loved since 8th grade as a creative outlet—became a desperate tool for survival. Every line of code I wrote, I wrote to stay free while my persecutors slept soundly, knowing I was filling their federal funding coffers. The severe trauma and anxiety this created manifests to this day.

32. Then I discovered the truth: The court knew. They all knew.

33. This wasn't negligence or mistake. This was design. Discovering that judicial officers—magistrates presiding in court—participated in deliberate fraud to destroy a citizen fundamentally alters one's relationship with society itself. Where does one turn when the courts themselves are the perpetrators?

34. The betrayal went deeper. My son's mother, who knew my struggles intimately, became their co-plaintiff. The compound trauma of fighting both the government and the mother of my child simultaneously created something I believe few humans have endured. I am lucky to be alive.

The Permanent Alterations

35. My life moving forward is irrevocably changed:

- a. Every interaction with government brings trauma
- b. Every official document triggers suspicion
- c. Every legal proceeding requires extraordinary vigilance
- d. Every promise from an institution rings hollow
- e. Every day carries the weight of knowing what they're capable of
- f. Programming, once my creative joy, is now forever tainted as the skill I had to weaponize for survival

36. I will never practice medicine. That dream died in their trap. The relationships I lost—work colleagues who couldn't understand my erratic availability, friends who watched me deteriorate, family members who grew distant as I struggled—these cannot be recovered. Opportunities vanished while I fought simply to remain free.

37. But worse than lost careers or relationships is the knowledge that must be carried forever: In America, magistrates can conspire against citizens with impunity. They can violate rights openly from the bench. They can commit extrinsic fraud in family court. And they can continue even after being caught.

Why This Amount

38. Corporations pay billions for defective products. Here, the defective product was justice itself. When the judiciary fails, when constitutional rights become fiction, when government agencies coordinate with magistrates presiding over cases—what is the value of that breach of public trust?

39. The ongoing violations compound daily. Each week brings new theft. Each document reveals new fraud. Each filing meets predetermined hostility. This is not a closed wound but an open persecution that continues as this complaint is filed. That theft continues every day I wake up in the America they revealed to me.

Moving Forward

40. \$1.2 billion acknowledges a fundamental truth: Some violations are so profound they alter the fabric of a life permanently. When you learn that your government conspired against you, that magistrates participated in fraud, that your desperate attempts to comply with court orders were entertainment for those who designed your failure—you are forever changed.

41. Yet I can forgive. I can sit across from those who nearly destroyed me and seek resolution. My compensation need not be solely monetary. Injunctive relief, systemic reforms, acknowledgment of wrongdoing, assurances this will never happen again—these have value beyond dollars. I seek to be made whole in every sense, not merely enriched.

42. Perhaps most surprisingly, this cruelty has deepened my compassion. I don't seek vengeance. I wouldn't wish this experience on my worst enemy—not even on those who inflicted it upon me. The profound isolation of fighting your own government while believing yourself broken is a suffering I want to ensure no one else endures. My goal isn't to punish but to prevent. Not to destroy but to heal. Not just to be compensated but to help fix the very systems that broke me.

43. I will live with this knowledge every day. My son will grow up knowing his father was targeted by the very systems meant to protect us. My family will forever distrust institutions. This generational damage, this permanent alteration of our relationship with our own government, cannot be undone.

44. The amount sought reflects not a single injury but an ongoing transformation of existence itself. When magistrates commit fraud from the bench, when those presiding over family courts violate their duties, they steal more than money or time—they steal the basic trust upon which society depends.

45. The medical records will show the physical manifestations. The court documents will prove the fraud. But no record can capture what it means to discover that those presiding over your case—magistrates sworn to impartiality—were actually conspirators in your destruction. To endure this while fighting through a pandemic, while the mother of your child joins your persecutors, while watching every relationship crumble under the weight of impossible demands—this is a human experience perhaps unique in its cruelty. That reality, now permanent, is what \$1.2 billion represents.

PARTIES

46. Plaintiff Marvin Tutt is an individual residing in Maryland who was, during all relevant times:

- a. Subject to criminal court mandate to complete a bachelor's degree within 5 years or face 10 years imprisonment
- b. A pre-med student at College of Southern Maryland before the conspiracy began
- c. Required to complete over 400 hours community service
- d. Under felony charges from 2019 until receiving probation before judgment in December 2024
- e. Currently subject to fraudulent child support orders despite completing criminal rehabilitation requirements
- f. Father of minor child Gabriel Robinson

47. Defendant Regina Robinson is an individual residing in Charles County, who:

- a. Filed as CO-PLAINTIFF with CSEA in Case No. C-08-FM-22-000821
- b. Shared attorney representation with a government agency
- c. Made false representations about custody arrangements
- d. Repeatedly lied about employment and income under oath
- e. Refused to respond to fraud allegations
- f. Continues to benefit from ongoing fraud through garnishments

48. Defendant Charles County Child Support Administration is a government agency that:

- a. Filed as CO-PLAINTIFF with Robinson on June 17, 2022
- b. Shared attorney Shara Gabrielle Hendler with Robinson
- c. Failed to verify obviously false claims before suing
- d. Continues enforcing fraudulent orders despite notice of fraud

- e. Participated in destroying court-ordered rehabilitation
- f. Receives federal Title IV-D incentive payments based on collections

49. Defendant Charles County Department of Social Services is a government agency that:

- a. Operates as parent agency of CSEA
- b. Employed Andrea Khoury from 2013-2022
- c. Systematically denied Plaintiff benefits across multiple programs despite eligibility
- d. Upon information and belief, coordinated cross-database flags to deny benefits
- e. Possessed knowledge of Plaintiff's criminal mandate and garnishment inability
- f. Created poverty through garnishment then denied poverty assistance

50. Defendant Charles County, Maryland is the governmental entity that:

- a. Operates CSEA and DSS
- b. Bears respondeat superior liability for its agencies' actions
- c. Benefits from Title IV-D federal funding through collections
- d. Failed to supervise its agencies' participation in fraud

51. Defendant Shara Gabrielle Hendler, Esq. is an attorney licensed in Maryland who:

- a. Represented BOTH CSEA and Robinson as co-plaintiffs
- b. Participated in the unprecedented co-plaintiff arrangement
- c. Filed fraudulent claims without verification
- d. Enabled the conspiracy through dual representation
- e. Records show removal from representation on May 6, 2023, shortly after plaintiff gained employment

52. Defendant Andrea Khoury **In her individual capacity** is an individual who:

- a. Served Charles County Department of Social Services from January 2013 through 2022 (9 years)
- b. Transitioned directly to magistrate position with zero cooling-off period
- c. First presided over CSEA co-plaintiff case on July 28, 2022—mere months after leaving DSS
- d. Possessed intimate knowledge of CSEA operations, federal funding mechanisms, and collection metrics
- e. Upon information and belief, participated in planning the co-plaintiff strategy while still employed at DSS
- f. Acted with deliberate indifference to Plaintiff's constitutional rights

53. Defendant Mistey L. Metzgar **In her individual capacity** is a magistrate who:

- a. Declared "You'll never get this terminated," prejudging all future proceedings on June 13, 2025
- b. Provided improper legal advice beyond judicial role
- c. Made false statements about notice requirements and court procedures
- d. Demonstrated predetermined bias against Plaintiff
- e. Upon information and belief, coordinated with Khoury and other conspirators
- f. Refused to sanction or require response from Robinson despite documented fraud

54. All Other Individual Defendants include any magistrates, CSEA representatives, DSS employees, or other individuals involved in Case No. C-08-FM-22-000821 who:

- a. Participated in hearings despite conflict of interest
- b. Made rulings furthering the conspiracy

- c. Demonstrated predetermined hostility and bias
- d. Made false statements about court authority
- e. Protected proven perjury after notice of fraud
- f. Participated in the scheme to guarantee imprisonment

STATE OF MARYLAND:

Defendant State of Maryland is the governmental entity that:

- a. Allowed suspension of Plaintiff's driver's license through child support enforcement
- b. Intercepted Plaintiff's state tax refunds without due process
- c. Oversees county DSS and CSEA operations
- d. Administers state-level benefits systematically denied to Plaintiff
- e. Failed to supervise its agencies and prevent constitutional violations
- f. Participates in and benefits from federal Title IV-D funding

JURISDICTION AND VENUE

55. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (federal question) and 42 U.S.C. § 1983 (civil rights).

56. Supplemental jurisdiction exists over state law claims pursuant to 28 U.S.C. § 1367.

57. The amount in controversy exceeds \$75,000 exclusive of interest and costs.

58. Venue is proper pursuant to 28 U.S.C. § 1391(b) as all defendants reside in this district and all events giving rise to the claims occurred here.

59. All defendants are subject to personal jurisdiction in this district as they are either residents of Maryland or committed tortious acts within Maryland targeting a Maryland resident.

STATEMENT OF FACTS

A. The Criminal Court's Rehabilitation Mandate

60. Following criminal proceedings, Judge Carrington-Martin imposed a carefully designed rehabilitation plan in December 2019:

- a. Complete a bachelor's degree within 5 years
- b. Perform over 400 hours of community service at Lifestyles in Charles County
- c. "Obey all laws"
- d. Alternative: serve 10 years backup time

61. This mandate was specifically crafted to occupy all of Plaintiff's time with constructive activities, preventing recidivism while providing a path to expungement and productive citizenship.

62. Plaintiff immediately enrolled at College of Southern Maryland as a pre-med student, beginning his rehabilitation journey. COVID-19 disruptions in March 2020 severely impacted his education, forcing classes online and eliminating several opportunities.

63. On June 13, 2025, during proceedings before Magistrate Metzgar, Plaintiff observed highly irregular coordination between Defendants that suggested predetermined outcomes. Having worked with government engineers and programmers on classified projects, Plaintiff understands how professionals genuinely collaborate to solve problems versus when parties are operating from predetermined scripts. While Plaintiff pleaded for compassion and understanding regarding his impossible circumstances, Defendants exhibited rehearsed responses and coordinated deflections inconsistent with good-faith problem-solving. Magistrate Metzgar's declaration that "You'll never get this terminated" before hearing evidence, combined with this scripted dynamic, confirmed something was deeply wrong. Within days, Plaintiff discovered the unprecedented co-plaintiff filing structure and the broader conspiracy detailed herein. This Complaint is filed within ten (10) days of discovering Defendants' scheme. Critically, Plaintiff's 6-7 emergency hospitalizations at Fort Washington Hospital, plus treatment by two physicians and a mental health professional in private practice, occurred PRIOR to discovering the conspiracy, demonstrating the severe medical and psychological impact of Defendants' impossible mandates even before their intentional nature was known. The Court should obtain and review the transcript and any audio/video recordings from the June 13, 2025 hearing, which will demonstrate Plaintiff's repeated pleas for compassion contrasted against Defendants' rehearsed responses and Magistrate Metzgar's prejudicial statements.

Documented Real-Time Medical Crisis and Defendant Robinson's Indifference

64. The severity of Plaintiff's medical emergencies is documented not only in hospital records but in contemporaneous communications. On October 25, 2024, while experiencing cardiac symptoms that would require emergency treatment, Plaintiff sent desperate pleas to Defendant Robinson:

At 8:29 AM: "help me. it's something new. since yesterday"

At 8:30 AM: "something is wrong w my heart/cardiac iwy"

65. Despite receiving explicit notice that Plaintiff was experiencing new cardiac symptoms, Defendant Robinson—the co-plaintiff in the fraudulent enforcement action—maintained complete silence. She offered no assistance, expressed no concern, and provided no response whatsoever to the father of her child's medical emergency.

66. The following day, October 26, 2024, Plaintiff's condition had deteriorated to the point of death anxiety, documented in another communication: "the only thing i want rn is my heart.... idw to die."

67. These communications occurred during the period of Plaintiff's 6-7 emergency hospitalizations at Fort Washington Hospital. While Defendants' impossible mandates drove Plaintiff to emergency rooms believing he was dying, Defendant Robinson—fully aware of his cardiac distress—chose silence over basic human compassion.

68. This evidence demonstrates that Defendants' conspiracy didn't merely cause financial harm—it created life-threatening medical emergencies that Defendant Robinson witnessed in real-time and consciously ignored, elevating her participation from civil fraud to callous indifference to human life.

B. The Conspiracy Forms: CSEA and Robinson as Co-Plaintiffs

69. On June 17, 2022, while Plaintiff struggled with pandemic-disrupted education, CSEA and Robinson filed as CO-PLAINTIFFS in Case No. C-08-FM-22-000821 (See Exhibit B-1, Smoking Gun #1).

70. This was not normal child support enforcement. The red flags of conspiracy appeared immediately:

- a. CSEA and Robinson listed as co-plaintiffs on the same side
- b. Both represented by the same attorney (Shara Gabrielle Hendler)
- c. No independent verification by CSEA despite government resources
- d. Rush to judgment against someone under criminal rehabilitation mandate

71. The arrangement raises critical questions requiring investigation:

- a. Why did Robinson have an attorney at all?
- b. Did CSEA approach her offering to "handle everything" and provide legal representation?
- c. What promises were made to secure her cooperation?
- d. Who initiated the unprecedented co-plaintiff structure?

C. The Fraudulent Foundation

72. Robinson, with CSEA's backing as co-plaintiff, made multiple false representations to the court (See Exhibit B, Category 2):

73. The Custody Lie: Robinson claimed she had the child 7 nights per week. In truth:

- a. The child spent 3-4 nights weekly with Plaintiff's mother and grandmother
- b. This arrangement was consistent and well-documented
- c. The lie triggered wrong statutory calculations, inflating support by hundreds monthly

74. The Employment Fraud: Robinson's income lies were serial and brazen:

- a. Initially concealed all employment
- b. When pressed, claimed "I haven't worked since PNC Bank"
- c. Moments later in the same hearing, admitted current income
- d. Pattern continued even AFTER fraud allegations were filed

75. CSEA, possessing governmental investigative powers, made ZERO effort to verify these claims before becoming Robinson's co-plaintiff.

D. The Mathematical Impossibility Created

76. The conspiracy created an impossible dual-mandate trap (See Exhibit B, Category 3):

- a. Criminal mandate: Full-time education (15 credit hours = 45-50 hours/week)
- b. Community service: 400 hours over mandate period
- c. Support obligation: Requiring full-time employment (40+ hours/week)
- d. Total demanded: 90+ hours per week
- e. Mathematical impossibility: Cannot work full-time while attending school full-time

77. This wasn't mere hardship—it was designed destruction. The Eighth Amendment prohibits punishments that are impossible to avoid. Yet CSEA, knowing of the criminal mandate, proceeded with co-plaintiff prosecution specifically to exploit this vulnerability.

E. The NGA Employment and Garnishment Mystery

78. Facing this impossible trap, Plaintiff made a desperate pivot from pre-med to software engineering, seeking faster employment through bootcamp training.

79. After intensive training, Plaintiff secured a position as sole Java developer on an NGA classified project at WebHead Technologies, earning \$82,000 annually. The company's CEO, Janie Gonzales, and technical lead, Bill Gonzales, demonstrated exceptional moral courage by hiring Plaintiff despite his criminal record—seeing potential where others saw only risk.

80. The inevitable occurred: attempting to maintain classified government work while pursuing mandated full-time education under threat of 10 years imprisonment caused complete mental and physical breakdown. This breakdown didn't just harm Plaintiff—it directly damaged the Gonzaleses' business, forcing them to lose their sole Java developer on a critical national security project.

81. The Garnishment Anomaly: Despite CSEA knowing about this substantial W-2 employment and promising garnishment, they collected \$0 from these wages (See Exhibit B-1, Smoking Gun #10). Critical questions arise:

- a. Why couldn't they garnish legitimate W-2 wages?
- b. Did Robinson ask why garnishments weren't happening?
- c. Did CSEA lie to her claiming they were garnishing?
- d. Was the garnishment failure what triggered the conspiracy's next phase?

82. Upon information and belief, Attorney Hendler withdrew from representation on May 6, 2023, shortly after Plaintiff secured the DoD contractor position and garnishment efforts failed, suggesting consciousness that the scheme had legal problems.

F. The Fraud Exposed and Willfully Continued

83. In early 2025, Plaintiff filed comprehensive motions exposing the fraud:

- a. Detailed Robinson's custody lies
- b. Documented her employment perjury with transcript citations
- c. Explained the mathematical impossibility
- d. Raised constitutional violations

84. The court's response revealed active participation in the conspiracy (See Exhibit B, Category 5):

- a. Refused to require Robinson to respond to fraud allegations
- b. Robinson stayed completely silent on documented fraud

- c. Never sanctioned Robinson for proven perjury
- d. At the next hearing, Robinson committed NEW fraud, again lying about employment
- e. Magistrate witnessed this post-notice perjury and protected her

85. Magistrate Metzgar declared "You'll never get this terminated," on June 13, 2025, prejudging all future proceedings before hearing evidence (See Exhibit B-1, Smoking Gun #7). She also:

- a. Provided improper legal advice beyond her judicial role
- b. Falsely claimed Plaintiff had only 10 days to respond without required notice
- c. Lied about court notification requirements
- d. Demonstrated coordination with Khoury through consistent predetermined rulings
- e. Criticized Plaintiff for what she considered to be lengthy filings, despite refusing to acknowledge them at all
- f. Falsely claimed the court lacked subpoena power for IRS records—a lie about the court's own authority designed to prevent discovery of Robinson's fraud

G. The Khoury Connection and Systematic Benefits Denial

86. The depth of the conspiracy is revealed by Magistrate Andrea Khoury's employment history (See Exhibit B, Category 4):

- a. January 2013-2022: Employed by Charles County DSS (9 years)
- b. June 17, 2022: Her former colleagues at CSEA file unprecedented co-plaintiff case
- c. July 28, 2022: Khoury presides over her former agency's case—just months after leaving

87. This wasn't a random assignment. Khoury possessed intimate knowledge of:

- a. Title IV-D federal incentive structures

- b. DSS database systems and vulnerabilities
- c. Collection metrics and performance bonuses
- d. Cross-agency coordination mechanisms

88. Following the failed garnishment of NGA wages, Plaintiff experienced systematic benefits denials that created then punished poverty:

- a. Unemployment Insurance: Required multiple appeals for unexplained holds
- b. Medicaid: Denied coverage citing excessive income during documented unemployment and homelessness
- c. SNAP Benefits: Rejected despite homelessness and clear evidence of unemployment
- d. Common thread: All programs cited phantom income data contradicting reality

89. The garnishment calculation reveals ongoing fraud (See Exhibit B-1, Smoking Gun #4): DSS/CSEA garnishes Plaintiff's \$430/week unemployment at a rate (\$138/week) that mathematically corresponds to his former \$82,000 salary—the very income they mysteriously couldn't garnish when he was actually employed. They are using phantom income from a job they failed to garnish to calculate current garnishments from unemployment.

H. The Willful Continuation and Current Status

90. As of June 2025, despite Plaintiff's fraud exposure:

- a. From March 2024 through June 13, 2025, Defendants attempted to garnish wages from NGA employment that ended March 7, 2024—over a year of trying to collect from a non-existent job
- b. On June 13, 2025, when Plaintiff notified the court of this impossibility, they refused to modify, directing him to CSEA
- c. CSEA demanded "proof" he no longer worked there—an impossible requirement to prove a negative

- d. Only after forced confrontation did they switch to garnishing unemployment benefits
- e. Even then, they used the phantom \$82,000 salary they couldn't garnish to calculate the unemployment garnishment rate
- f. Each weekly garnishment is a new theft based on exposed fraud
- g. Defendants refuse to correct or investigate the underlying fraudulent order

91. On June 17, 2025, Plaintiff attempted administrative resolution, asking the court clerk (Exhibit A):

- a. How unemployment could be garnished based on employment wages
- b. For correction of false statements in court records
- c. For explanation of the calculation method
- d. To explain the switch from collecting ~\$540 a month to ~\$160 a month without rectifying past mistakes or explaining why the previous order was allowed to continue, despite plaintiff's fair representation of proven inconsistency and fraud

92. The June 17, 2025 email exchange (Exhibit A) proves willful continuation:

- a. Plaintiff specifically asked: "how is it possible for a procedural system to garnish unemployment, based on wages from an employer?"
- b. This direct question about the fraudulent calculation was improperly dismissed as seeking "legal advice"
- c. Plaintiff requested correction of false statements claiming he was "unable to continue work" when the truth was the court's impossible mandate caused breakdown
- d. Plaintiff clarified: "I was fully capable of performing my duties" as sole Java developer
- e. The findings falsely state inability to work when Plaintiff explicitly stated it was the dual-mandate trap that made continuation impossible
- f. The clerk's response: "I cannot give you legal advice" - refusing to address mathematical fraud or correct false records

g. Plaintiff even said he wanted to handle it "this way rather than file more motions" - showing good faith attempt at resolution

h. This wasn't seeking legal advice—it was exposing ongoing theft and requesting correction of lies

93. This exchange proves Defendants' criminal intent: When directly confronted with the impossibility of their garnishment calculation, they deflect, dismiss, and continue stealing. The email chain shows Plaintiff's reasonable tone ("sorry i made a mistake") and persistence ("please document the entire email chain") met with institutional stonewalling designed to protect ongoing theft. Most telling: Even after this direct confrontation about their fraud, they continue garnishing weekly, proving they believe themselves untouchable.

I. The Calculated Deception and Institutional Failures

94. CSEA representatives may have participated in hearings despite being plaintiffs in the case—a calculated deception from the start that violates basic fairness principles.

95. The pattern reveals systemic corruption:

- a. They attempted to override Judge Carrington-Martin's rehabilitation order
- b. They ignored articulate legal arguments with case citations
- c. They protected proven fraud rather than investigate
- d. They bet on prison to silence their victim

96. They insulted every institution involved:

- a. The federal government (treating Title IV-D as a slush fund)
- b. Judge Carrington-Martin (treating her order as worthless)
- c. The U.S. Congress (perverting programs meant to help children)

- d. Honest DSS workers (making them unwitting accomplices)
- e. The judicial system (corrupting courts into collection agencies)
- f. The taxpayers (using their money for conspiracy)

97. Defendants never expected Plaintiff to succeed. They profiled him—young, Black, criminal record, bachelor dreams, too ambitious—and bet everything on his failure. When he pivoted to software engineering and secured classified work, it shattered their calculations. His success exposed their conspiracy because they never imagined he'd survive to tell the tale.

J. Enforcement Actions While Perpetrating Fraud

98. Despite knowing their calculations were fraudulent, Defendants pursued the most aggressive enforcement actions available:

99. Driver's License Suspension: Defendants suspended Plaintiff's driver's license, knowing this would cripple his ability to:

- a. Commute to the NGA contractor position that required security badge access
- b. Attend evening classes for his mandated education
- c. Fulfill community service requirements at Lifestyles
- d. Maintain any employment in car-dependent Charles County
- e. Access basic necessities without begging for rides

100. Contempt Threats: While refusing to correct known fraud, Defendants repeatedly threatened:

- a. Immediate imprisonment for contempt of court
- b. Additional criminal charges for non-compliance

- c. Permanent criminal record enhancement
- d. Loss of any chance at expungement

101. The Enforcement Paradox: Defendants created an impossible loop:

- a. Can't work without driver's license
- b. Can't get license restored without paying fraudulent garnishments
- c. Can't pay without working
- d. Can't challenge fraud while under contempt threat
- e. Each enforcement action deepened the impossibility

102. Weaponized Legitimacy: Most perniciously, Defendants used the state's legitimate enforcement powers to:

- a. Cover up their fraud (who questions enforcement actions?)
- b. Silence Plaintiff through fear of contempt
- c. Create appearance of "deadbeat dad" to justify conspiracy
- d. Ensure public records would forever mark Plaintiff as irresponsible
- e. Make their victim appear deserving of destruction

K. The Revenue Calculation That Drove Everything

103. Upon information and belief, Defendants performed a cold financial calculation:

- a. Standard collection: $\$300/\text{month} \times 18 \text{ years} = \$64,800$ (federal incentive: $\sim \$1,944$)
- b. Their conspiracy model: Prison wages + post-release garnishment = $\$126,000+$ (federal incentive: $\$8,780+$)

- c. Profit multiplier: 4.5×
- d. They sold Plaintiff's freedom for a percentage

104. Plaintiff's son Gabriel was harmed by being deprived of his father's presence and support during critical years. No rational person could believe imprisoning a father for 10 years while collecting prison wages serves a child's best interests.

105. They Tried to Steal Everything:

- a. 10 YEARS OF FREEDOM: Deliberately created conditions to force imprisonment
- b. HIS SON: Attempted to separate father and child for a decade
- c. EXPUNGEMENT: Sought to destroy his only path to a clean record
- d. REHABILITATION: Actively undermined the criminal court's mandate
- e. HUMAN DIGNITY: Treated him as a revenue stream, not a human being
- f. A FUTURE: Attempted to murder everything he could become

L. The Poetic Justice: Their Pressure Created Their Own Exposer

106. In forcing Plaintiff toward software engineering through impossible circumstances, Defendants created their own destruction. The pressure to find immediate employment led him to develop:

- a. Skills to decode their conspiracy
- b. Pattern recognition to identify their fraud
- c. Digital forensics capabilities and understanding
- d. Understanding of government systems from classified work

107. Had they allowed him to pursue medicine peacefully, he would have become a healer, not their exposer. Their digital conspiracy met someone whose forced career pivot gave him the exact skills needed to expose it.

M. Statistical Discovery Will Reveal Other Victims

108. Upon information and belief, Plaintiff is not alone in experiencing these tactics. While discovery may reveal others in similar situations, Plaintiff seeks only resolution of his own unique circumstances.

109. Discovery must reveal:

- a. Patterns relevant to Plaintiff's own case
- b. Evidence supporting Plaintiff's damage calculations
- c. Documentation of the conspiracy against Plaintiff specifically
- d. Information necessary to prove Plaintiff's individual claims

N. Evidence Preservation Demand

110. Plaintiff has issued comprehensive Evidence Preservation Demands to all parties requiring immediate preservation of:

- a. All databases, emails, communications, and records
- b. Audio/video recordings from all proceedings
- c. Financial records and federal incentive calculations
- d. Training materials on federal funding maximization
- e. Cross-agency communications

f. All metadata and audit logs

111. Failure to preserve evidence will result in adverse inference instructions, sanctions, and potential criminal prosecution for obstruction of justice.

LEGAL FRAMEWORK

A. Why This Becomes "Punishment" Subject to Constitutional Scrutiny

112. While child support enforcement is typically civil, when government agencies conspire to create impossible compliance scenarios for someone under criminal mandate, it transforms into punishment subject to Eighth Amendment protection.

113. The Supreme Court in **Trop v. Dulles**, 356 U.S. 86 (1958), recognized that the "basic concept underlying the Eighth Amendment is nothing less than the dignity of man." Defendants' conspiracy stripped Plaintiff of all human dignity.

114. In **Robinson v. California**, 370 U.S. 660 (1962), the Court held that punishing someone for a status or condition violates the Eighth Amendment. Here, Defendants punished Plaintiff for his status as a criminal defendant attempting rehabilitation.

B. Due Process and Equal Protection Violations

115. The Fourteenth Amendment guarantees both procedural and substantive due process. Defendants violated both by:

- a. Depriving property through fraud
- b. Denying meaningful opportunity to be heard

- c. Creating predetermined outcomes
- d. Using extraordinary procedures designed to circumvent protections

116. Equal Protection was violated when Defendants treated Plaintiff differently than all other child support obligors based solely on his criminal defendant status, adopting unprecedented co-plaintiff procedures specifically to exploit this vulnerability.

C. Piercing Judicial Immunity

117. While judges typically enjoy absolute immunity for judicial acts, this immunity is not limitless. The Supreme Court recognizes exceptions for: (1) non-judicial actions, and (2) actions taken in complete absence of jurisdiction. **Stump v. Sparkman**, 435 U.S. 349 (1978).

118. The magistrates' participation in this conspiracy falls outside protected judicial conduct:

- a. Coordinating with former colleagues is administrative, not judicial
- b. Lying about court powers is not a judicial function
- c. Participating in revenue-generating schemes abandons judicial role
- d. Prejudging outcomes before evidence ("You'll never get this terminated") shows non-judicial animus
- e. Providing legal advice to parties exceeds judicial authority
- f. Making false statements about procedural requirements is not a judicial act

119. In **Mireles v. Waco**, 502 U.S. 9 (1991), the Court clarified that judicial immunity does not apply to actions taken in the "clear absence of all jurisdiction." When magistrates conspire to create fraudulent garnishment calculations using phantom income, they act without any colorable claim to jurisdiction.

120. Additionally, when judges act in conspiracy with parties before them, they lose immunity. *Dennis v. Sparks*, 449 U.S. 24 (1980) held that judges are not immune from § 1983 liability when they conspire with private parties to corruptly influence their judicial acts. Here, the coordination between Khoury (fresh from DSS), Metzgar (prejudging outcomes), and others shows agreement outside the courtroom to ensure Plaintiff's destruction.

121. In *Pulliam v. Allen*, 466 U.S. 522 (1984), the Court allowed prospective injunctive relief against judicial officers, recognizing that systematic violations of constitutional rights by judicial officers warrant federal intervention. The ongoing weekly garnishments based on admitted phantom income constitute precisely such systematic violations requiring injunctive relief.

CAUSES OF ACTION

COUNT I - CONSPIRACY TO VIOLATE CIVIL RIGHTS (42 U.S.C. § 1983)

Against All Defendants

122. Plaintiff incorporates all preceding paragraphs.

123. All Defendants, acting under color of state law, conspired to deprive Plaintiff of constitutional rights.

124. The conspiracy involved:

- a. Adoption of unprecedented co-plaintiff structure to target criminal defendant
- b. Filing based on fraud without verification
- c. Creating mathematically impossible compliance requirements
- d. Designing prosecution to circumvent normal protections
- e. Predetermined rulings regardless of evidence

- f. Continuing collection after fraud exposure
- g. Cross-agency coordination to maximize pressure
- h. Attempting to override Judge Carrington-Martin's rehabilitation order
- i. Using phantom income from ungarnishable wages to calculate garnishments
- j. Creating poverty through garnishment then denying poverty assistance
- k. Dismissing direct questions about fraud as "seeking legal advice"

125. The overt acts in furtherance included:

- a. June 17, 2022: Filing as co-plaintiffs with shared attorney - unprecedented in Maryland history
- b. July 28, 2022: Khoury presiding months after leaving DSS - no recusal despite obvious conflict
- c. 2022-2023: Robinson's serial perjury about custody and employment, endorsed by CSEA
- d. 2022-2023: Creating impossible dual mandate knowing about Judge Carrington-Martin's rehabilitation order
- e. 2023: Mysteriously failing to garnish \$82,000 W-2 wages
- f. May 6, 2023: Hendler removal shortly after plaintiff's employment
- g. 2023-2024: Systematic benefits denials (UI, SNAP, Medicaid) citing phantom income
- h. 2024: Using ungarnishable \$82k salary to calculate garnishments after job loss
- i. 2025: Court refusing to require Robinson to respond to fraud allegations
- j. 2025: Robinson committing NEW perjury after being on notice of fraud allegations
- k. 2025: Magistrates protecting proven perjury rather than sanctioning it
- l. June 13, 2025: Metzgar prejudging outcomes: "You'll never get this terminated" before hearing evidence
- m. June 13, 2025: Magistrate lying about court's subpoena powers to prevent discovery

- n. June 17, 2025: Refusing to explain fraudulent garnishment calculations when directly asked
- o. June 17, 2025: Dismissing fraud exposure as "seeking legal advice"
- p. June 17, 2025: Falsely claiming Plaintiff was "unable to continue work" in official findings
- q. 2025: Continuing weekly garnishment after fraud exposure
- r. Throughout: Deliberately overriding Judge Carrington-Martin's rehabilitation order
- s. Throughout: Treating father seeking education as revenue source, not human being
- t. Throughout: Choosing federal incentives over child's best interest of having father out of prison

126. As a direct and proximate result, Plaintiff suffered damages detailed herein.

COUNT II - EIGHTH AMENDMENT VIOLATION

Against CSEA, DSS, Charles County, and Magistrate Defendants

127. Plaintiff incorporates all preceding paragraphs.

128. Defendants violated the Eighth Amendment by creating punishment that was:

- a. Mathematically impossible to avoid
- b. Designed to ensure imprisonment
- c. Grossly disproportionate to any legitimate interest
- d. Inflicted with deliberate indifference to human dignity

129. The dual-mandate trap constituted cruel and unusual punishment as it guaranteed imprisonment regardless of Plaintiff's efforts at compliance.

COUNT III - FOURTEENTH AMENDMENT VIOLATIONS

Against All Governmental Defendants

130. Plaintiff incorporates all preceding paragraphs.

131. Equal Protection: Defendants treated Plaintiff differently than similarly situated parents based solely on his criminal defendant status, adopting unprecedented procedures designed to exploit this vulnerability.

132. Procedural Due Process: Defendants denied meaningful opportunity to be heard by:

- a. Refusing to address fraud allegations
- b. Protecting proven perjury
- c. Making predetermined rulings
- d. Continuing enforcement despite exposed fraud
- e. Refusing to sanction Robinson despite documented fraud
- f. Dismissing legitimate questions as "seeking legal advice"

133. Substantive Due Process: The conspiracy to destroy court-ordered rehabilitation shocks the conscience and violates fundamental fairness.

COUNT IV - FRAUD

Against Robinson, CSEA, and Hendler

134. Plaintiff incorporates all preceding paragraphs.

135. Robinson knowingly made false representations regarding:

- a. Custody arrangements (7 nights vs. actual 3-4)
- b. Employment status (multiple instances of perjury)
- c. Income (concealment and false statements)

136. CSEA and Hendler endorsed and pursued these false claims as co-plaintiffs without verification, demonstrating reckless disregard for truth. Additionally, on June 17, 2025, the court issued findings falsely claiming Plaintiff was "unable to continue work" when he explicitly stated he was fully capable as sole Java developer—it was the impossible dual-mandate that forced the breakdown.

137. Plaintiff relied on the judicial system to verify claims, suffering severe detriment from the fraud.

COUNT V - CONSPIRACY TO COMMIT FRAUD

Against All Defendants

138. Plaintiff incorporates all preceding paragraphs.

139. Defendants agreed to defraud Plaintiff through coordinated action including:

- a. Joint prosecution as co-plaintiffs
- b. Shared attorney representation
- c. Refusal to verify obvious lies
- d. Protection of exposed perjury

- e. Cross-agency benefits denial
- f. Continuation despite fraud notice

140. Each Defendant committed overt acts in furtherance of the conspiracy as detailed above.

COUNT VI - ABUSE OF PROCESS

Against All Defendants

141. Plaintiff incorporates all preceding paragraphs.

142. Defendants perverted the legal process from legitimate child support enforcement to:

- a. Instrument of destruction
- b. Means to prevent rehabilitation
- c. Tool for guaranteed imprisonment
- d. Method to maximize federal funding

143. The process was used for ulterior purposes beyond any legitimate governmental interest.

COUNT VII - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Against All Defendants

144. Plaintiff incorporates all preceding paragraphs.

145. Defendants' conduct was extreme and outrageous:

- a. Government agencies conspiring with private citizen
- b. Creating impossible imprisonment scenarios
- c. Destroying court-ordered rehabilitation
- d. Continuing after observing mental breakdown
- e. Stealing wages based on exposed fraud
- f. Creating poverty then denying assistance for that poverty
- g. Dismissing fraud exposure as "seeking legal advice"
- h. Treating legitimate questions about theft as inappropriate inquiries

146. Defendants intended to cause, or recklessly disregarded the probability of causing, severe emotional distress.

147. Plaintiff suffered severe emotional distress including documented PTSD, requiring ongoing treatment.

REQUEST FOR CRIMINAL INVESTIGATION

148. Based on evidence of coordinated fraud across multiple agencies, involvement of multiple actors, and pattern of racketeering activity, Plaintiff respectfully requests this Court refer the matter to the U.S. Attorney for investigation of potential violations of:

- a. 18 U.S.C. § 371 (Conspiracy to defraud United States)
- b. 18 U.S.C. § 1001 (False statements)
- c. 18 U.S.C. § 666 (Theft from programs receiving federal funds)
- d. 18 U.S.C. § 1961 et seq. (RICO)

149. The evidence suggesting RICO violations includes:

- a. The Enterprise: An association-in-fact of CSEA, DSS, magistrates, attorney, and private citizen
- b. Pattern of Racketeering: Mail fraud (court filings), wire fraud (electronic submissions), obstruction of justice
- c. Interstate Commerce: Federal funding streams, interstate banking, federal contractor employment
- d. Continuity: Ongoing from 2022 to present with no sign of cessation
- e. Common Purpose: Maximizing federal incentive payments through fraudulent collections

150. Plaintiff does not bring a civil RICO claim but presents this evidence for criminal investigation, as the pattern suggests organized crime requiring federal prosecution. This criminal referral is separate from and does not affect the civil claims presented herein.

KEY WITNESSES

151. Janie Gonzales - CEO, WebHead Technologies

- Will testify to hiring Plaintiff despite criminal record
- Can confirm his competence as sole Java developer
- Can verify business damage from losing developer due to impossible mandates
- Address: [Contact through counsel]

152. Bill Gonzales - Technical Lead, WebHead Technologies

- Supervised Plaintiff's classified NGA project work

- Can confirm technical competence and work quality
- Will verify inability to maintain employment under dual mandates
- Address: [Contact through counsel]

153. Lifestyles Staff - Community Service Supervisors

- Can verify Plaintiff's 400+ hours of mandated service
- Will confirm time demands of service requirements
- Can testify to character transformation during service
- Address: [Charles County location]

154. Fort Washington Hospital Records Custodian

- Will authenticate 6-7 emergency visits
- Can verify cardiac symptoms and death anxiety
- Medical records prove severity of breakdown from impossible mandates
- Address: Fort Washington, MD

155. College of Southern Maryland Registrar

- Can verify pre-med enrollment and pandemic disruption
- Will confirm full-time student status requirements
- Can authenticate education timeline and demands
- Address: La Plata, MD

156. Judge Carrington-Martin (if permitted)

- Can explain rehabilitation mandate design
- Will confirm intention of education requirement
- Can verify conflict with support enforcement
- Address: Charles County Circuit Court

157. Plaintiff's Mother and Grandmother

- Will testify to actual custody arrangements (3-4 nights weekly)
- Can confirm Robinson's custody perjury
- Have direct knowledge of childcare patterns
- Address: [Family residence]

158. Mental Health Treatment Providers

- Can testify to PTSD diagnosis and treatment
- Will verify causation from impossible mandates
- Can authenticate ongoing treatment needs
- Names: [Protected health information]

159. Government Database Administrators (through discovery)

- Must explain cross-agency data sharing
- Will reveal systematic benefits denials
- Can show phantom income in systems
- Identity: To be determined through discovery

160. Title IV-D Program Administrators (federal witnesses)

- Can explain incentive payment structures
- Will verify collection-based funding formulas
- Must authenticate payment calculations
- Address: Administration for Children and Families

161. NGA Security Officers (if declassified)

- Can verify security clearance impacts
- Will confirm employment verification attempts
- May testify to reputation damage in cleared community
- Contact: Through appropriate channels

162. Charles County Detention Center Staff

- Can testify to prison wage garnishment rates
- Will verify collection capabilities from inmates
- Can calculate projected prison revenue
- Address: Charles County facility

163. Maryland Judiciary IT Staff

- Must explain calculation algorithms
- Will reveal garnishment formula errors
- Can show phantom income calculations
- Identity: Through technical discovery

164. Former DSS/CSEA Employees (whistleblowers)

- May confirm internal pressure for collections
- Could verify training on maximizing federal funds
- Might expose coordination between agencies
- Identity: Protected until disclosure

COMPREHENSIVE DAMAGES SECTION

DAMAGES

165. As a direct and proximate result of Defendants' conspiracy and ongoing violations, Plaintiff has suffered and continues to suffer the following damages:

A. Overview of Harm

166. Defendants' conspiracy created a mathematically impossible trap: comply with Judge Carrington-Martin's criminal rehabilitation mandate requiring full-time education, or work full-time to pay support inflated by fraud. This impossibility was not accidental—it was designed to guarantee imprisonment and maximize federal Title IV-D incentive payments. The conspiracy has destroyed every aspect of Plaintiff's life: career, education, credit, relationships, mental health, and father-son bond.

167. Most horrifically, Plaintiff only discovered this conspiracy ten (10) days ago, on June 13, 2025, when Magistrate Metzgar declared "You'll never get this terminated" before hearing evidence. The realization that his 6-7 emergency hospitalizations at Fort Washington Hospital—where he believed death was imminent while trying to comply with

rehabilitation—were caused by INTENTIONAL government torture, not unfortunate circumstances, constitutes fresh psychological trauma justifying enhanced damages.

B. Economic Damages - \$24,840,000

168. Lost Medical Career - \$18,000,000

- Plaintiff was a pre-med student before the conspiracy began
- Average physician lifetime earnings: \$10-20 million
- Specialty physician potential: \$20-40 million
- Age at disruption: early 20s (40+ year career lost)
- Calculation: $\$400,000/\text{year} \times 45 \text{ years} = \$18,000,000$

169. Lost Technology Career - \$4,500,000

- Demonstrated ability: Sole Java developer on classified NGA project
- Starting salary achieved: \$82,000 at entry level
- Projected senior developer earnings: \$150,000-\$250,000
- Security clearance premium: Additional 20-30%
- Career interrupted by impossible mandates
- Calculation: $\$150,000/\text{year} \times 30 \text{ years} = \$4,500,000$

170. Educational Investment Losses - \$200,000

- Pre-med coursework abandoned
- Software bootcamp training costs
- Lost time value of education

- Student loan interest during disruption
- Inability to complete either path due to conspiracy

171. Direct Financial Theft - \$140,000

- Fraudulent support calculations (inflated by hundreds monthly)
- Three years of overpayment: $\$300/\text{month} \times 36 \text{ months} = \$10,800$
- Garnishment of non-existent wages (March 2024-June 2025)
- Garnishment using phantom income calculations
- Lost tax refunds and benefits
- Estimated total stolen: \$50,000+

172. Business and Opportunity Costs - \$2,000,000

- Damaged relationship with WebHead Technologies
- Lost security clearance opportunities
- Inability to maintain professional certifications
- Destroyed networking in classified community
- Reputational damage in tight-knit cleared professional circles

C. Non-Economic Damages - \$35,160,000

173. Physical Health Deterioration - \$5,000,000

- 6-7 emergency hospitalizations at Fort Washington Hospital
- Documented cardiac symptoms requiring emergency treatment

- Chronic stress-induced conditions
- Sleep deprivation from impossible schedule demands
- Permanent anxiety disorders manifesting physically

174. Mental Health Destruction - \$10,000,000

- Diagnosed PTSD from government persecution
- Severe anxiety disorder requiring ongoing treatment
- Depression from systematic life destruction
- Cognitive impacts from chronic stress
- Recent trauma discovering intentional nature (June 2025)

175. Parent-Child Relationship Damage - \$15,000,000

- Conspiracy designed to imprison father for 10 years
- Lost developmental years with son Gabriel
- Inability to provide stable home due to garnishments
- Psychological impact on child from father's persecution
- Destruction of normal parent-child bonding

176. Liberty Interest Violations - \$5,000,000

- Faced 10 years imprisonment from impossible mandates
- Lost driving privileges affecting basic freedom
- Constant threat of contempt imprisonment
- Restricted movement due to legal proceedings

- Loss of fundamental autonomy

177. Reputational Destruction - \$160,000

- Public records showing "deadbeat" status
- Security clearance implications
- Professional reputation in cleared community
- Social stigma from enforcement actions
- Permanent internet footprint of false allegations

D. Consequential Damages - \$20,000,000

178. Future Medical Costs - \$2,000,000

- Lifetime PTSD treatment
- Cardiac monitoring from stress damage
- Anxiety disorder management
- Therapy for father-child relationship repair
- Medication and psychiatric care

179. Future Economic Impacts - \$18,000,000

- Reduced earning capacity from record
- Security clearance complications
- Limited career advancement
- Ongoing garnishment impacts

- Credit destruction effects

E. Punitive Damages Justification - \$1,080,000,000

180. The egregiousness of Defendants' conduct warrants punitive damages at a 9:1 ratio to compensatory damages ($\$120\text{M} \times 9 = \$1,080\text{M}$). Factors supporting this ratio:

181. Intentional Constitutional Violations

- Deliberate creation of impossible mandates
- Knowing violation of Eighth Amendment
- Calculated destruction of due process rights
- Systematic denial of equal protection

182. Abuse of Governmental Power

- Unprecedented co-plaintiff arrangement
- Weaponization of enforcement authority
- Corruption of judicial processes
- Perversion of federal programs

183. Financial Motivation

- Calculated federal incentive maximization
- Treating human as revenue stream
- Prioritizing collections over child welfare
- Cold financial calculations of imprisonment profits

184. Cover-Up and Continuation

- Ongoing theft after fraud exposure
- Protection of proven perjury
- Refusal to investigate or correct
- Active concealment through deflection

185. Vulnerable Victim Targeting

- Exploited criminal defendant status
- Targeted during rehabilitation attempt
- Attacked while pursuing education
- Maximized vulnerability for profit

186. Deterrence Necessity

- Must deter future conspiracies
- Protect other vulnerable defendants
- Ensure government accountability
- Prevent incentive-driven persecution

F. Injunctive Relief Value

187. Beyond monetary damages, the injunctive relief sought has substantial value:

- Immediate cessation of ongoing theft

- Record correction and expungement
- Protection from future persecution
- Restoration of rights and privileges

G. Total Damages Summary

188. Compensatory Damages: \$120,000,000

- Economic: \$44,840,000
- Non-Economic: \$35,160,000
- Consequential: \$20,000,000
- Discovery Adjustments: \$20,000,000

189. Punitive Damages: \$1,080,000,000

- 9:1 ratio justified by egregious conduct
- Constitutional violations demand deterrence
- Government conspiracy requires strong message

190. Total Damages Sought: \$1,200,000,000

H. Damages Allocation by Defendant

191. Charles County Defendants (CSEA, DSS, County) - \$900,000,000

- Primary conspirators with government power

- Received federal incentives from fraud
- Systematic abuse across agencies
- Joint and several liability

192. Magistrate Defendants (Khoury, Metzgar, Others) - \$200,000,000

- Abused judicial authority
- Violated oath of office
- Enabled and protected fraud
- Individual capacity liability

193. Attorney Hendler - \$50,000,000

- Facilitated unprecedented co-plaintiff fraud
- Violated professional ethics
- Enabled conspiracy through dual representation
- Knew or should have known of impossibility

194. Robinson - Disgorgement Only

- Return all fraudulently obtained funds
- No punitive damages sought
- Primarily a tool of government conspiracy
- Court discretion on additional damages

I. Special Damages Considerations

195. Fresh Discovery of Conspiracy (June 2025)

- Psychological trauma from learning truth
- Realization that suffering was intentional
- New PTSD from government torture discovery
- Justifies enhanced emotional distress damages

196. Ongoing Weekly Harm

- Each garnishment is new theft
- Continuing violation doctrine applies
- Damages accumulate during litigation
- Emergency relief needed immediately

197. Multiplier Effect of Conspiracy

- Government conspiracy justifies enhancement
- Multiple agencies coordinating
- Judicial participation elevates severity
- Public trust violation demands accountability

J. Alternative Minimum Damages

198. Should the Court find \$1.2 billion excessive, Plaintiff establishes minimum damages:

- Lost wages during impossible mandates: \$246,000

- Fraudulent garnishments: \$50,000
- Medical costs: \$100,000
- Therapy and treatment: \$50,000
- Absolute minimum compensatory: \$446,000
- Minimum punitive (3:1): \$1,338,000
- Total minimum: \$1,784,000

199. However, minimum damages fail to capture:

- Destroyed careers (medical and technology)
- Ten-year imprisonment attempt
- Ongoing psychological torture
- Systematic life destruction
- Constitutional violations

K. Damage Calculation Methodology

200. Calculations based on:

- Bureau of Labor Statistics wage data
- Medical career earnings studies
- Technology sector compensation surveys
- Established pain and suffering precedents
- Constitutional violation case law
- Punitive ratios in government misconduct cases

201. Discovery will refine calculations through:

- Expert testimony on career losses
- Medical documentation of harm
- Economic analysis of opportunities lost
- Psychological evaluation of trauma
- Actuarial projections of future losses

A NOTE ON DAMAGES, INTENT, AND RECOGNITION OF EXCELLENCE

202. Plaintiff acknowledges the substantial damages sought herein—\$1.2 billion—may appear extraordinary. These figures derive from established economic methodologies, documented medical emergencies, and precedential multipliers for constitutional violations. The calculations reflect actual harm: destroyed life and medical career, security clearance impediments, damages to personal and government relationships, hospitalizations, ongoing weekly theft, and more.

203. Plaintiff's intent is not to damage governmental operations or burden taxpayers. Rather, these damages reflect the magnitude of a conspiracy that weaponized government agencies against a father seeking education.

204. Plaintiff specifically COMMENDS and honors:

The Honorable Judge Carrington-Martin - Whose revolutionary vision of rehabilitation through education saved not just Plaintiff but created a model for transforming justice nationwide. Her faith in human potential through education stands in stark contrast to those who sought to destroy it.

Charles County Office of Parole and Probation - Who supervised Plaintiff with professionalism, fairness, and humanity throughout his rehabilitation. They embodied the true purpose of criminal justice: transformation, not destruction.

The unnamed heroes within these agencies - Who quietly resist corruption, follow the law, and serve citizens with integrity despite systemic pressures.

205. These exemplary public servants prove that the government can uplift rather than destroy. They deserve recognition, not liability.

206. Plaintiff seeks resolution in his case: Beyond damages, Plaintiff is willing to accept structured settlements that might include consulting arrangements as partial compensation for:

- Technical solutions preventing fraudulent garnishments in Plaintiff's case
- Educational pathways for parents under court mandates similar to Plaintiff's
- Oversight mechanisms protecting Plaintiff from future harm
- Compensation structured to benefit Plaintiff's specific circumstances

207. Not all defendants bear equal responsibility. Many government employees likely participated unknowingly. Plaintiff seeks accountability from those who directly harmed him.

208. The goal is resolution: obtaining appropriate compensation and stopping ongoing harm to Plaintiff while allowing defendants to address any vulnerabilities they choose to address.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court:

A. Award compensatory damages of \$120,000,000 against Defendants CSEA, DSS, Charles County, Hendler, Khoury, Metzgar, and all other individual defendants, jointly and severally;

B. Award punitive damages of \$1,080,000,000 against all Defendants except Robinson for willful constitutional violations;

C. Order disgorgement of all fraudulently collected funds from Robinson, with all other damages against her left to Court's discretion;

D. Enter immediate permanent injunction:

1. IMMEDIATELY ceasing all collection efforts against Plaintiff (emergency relief needed as theft continues weekly)

2. Vacating all orders based on fraud

3. Correcting all public records regarding Plaintiff

4. Barring defendants from any involvement in Plaintiff's matters

5. Prohibiting retaliation against Plaintiff or witnesses

E. Order comprehensive relief:

1. Expungement of all enforcement records against Plaintiff

2. Restoration of Plaintiff's driving privileges

3. Federal monitor for CSEA operations as they relate to Plaintiff

4. Investigation of why Robinson had attorney representation

5. Protections ensuring this never happens to Plaintiff again

F. Order immediate evidence preservation and compliance with Plaintiff's preservation demands, with sanctions for any spoliation;

G. Order comprehensive discovery including:

1. Evidence supporting Plaintiff's damage calculations
2. Documentation of the conspiracy against Plaintiff
3. Federal incentive payment calculations related to Plaintiff's case
4. Cross-agency communication records about Plaintiff
5. Information necessary to prove Plaintiff's individual claims

H. Refer matter to U.S. Attorney for criminal investigation and prosecution under:

1. 18 U.S.C. § 371 (Conspiracy to defraud United States)
2. 18 U.S.C. § 1001 (False statements)
3. 18 U.S.C. § 666 (Theft from programs receiving federal funds)
4. 18 U.S.C. § 1961 et seq. (RICO)
5. 18 U.S.C. § 1519 (Obstruction of justice)

I. Award attorney's fees and costs pursuant to 42 U.S.C. § 1988;

J. Retain jurisdiction to ensure compliance and prevent retaliation against Plaintiff;

K. Order reforms specific to Plaintiff's case:

1. Prohibition on co-plaintiff arrangements involving Plaintiff
2. Mandatory verification before any future claims against Plaintiff

3. Independent review of any future cases involving Plaintiff
4. Protections ensuring Plaintiff is never subjected to similar treatment

L. Grant such other relief as justice requires to make Plaintiff whole.

INJUNCTIVE RELIEF AS ALTERNATIVE TO FULL DAMAGES

209. In addition to monetary damages, Plaintiff seeks comprehensive injunctive relief. These injunctive relief options provide opportunities for more favorable settlement agreements as compensation for Plaintiff's specific harms.

210. Plaintiff presents the following categories of injunctive relief, organized by priority and direct connection to harms suffered:

TIER ONE: ESSENTIAL REMEDIATION

211. These elements directly address the core harms caused to Plaintiff by Defendants' conspiracy

Career and Clearance Restoration

- Security clearance support letters and liaison assistance for Plaintiff
- Executive reference letters for Plaintiff from department heads
- Official documentation that negative records stem from conspiracy against Plaintiff
- Expungement of all enforcement-related records against Plaintiff
- Non-compete waivers for Plaintiff's private sector work

This tier directly repairs the professional destruction caused to Plaintiff.

212. Revenue-Generating Contracts

- Multi-year consulting contracts for Plaintiff at market rates
- Training development and delivery contracts for Plaintiff
- Technical advisory roles for Plaintiff on system improvements
- Performance-based compensation structures
- Minimum annual guarantees: \$250,000-\$500,000

Contracts provide income to Plaintiff while allowing Plaintiff to contribute expertise.

213. Professional Protection

- Indemnification for Plaintiff's work
- Professional liability insurance coverage for Plaintiff
- Hold harmless agreements protecting Plaintiff
- Anti-retaliation provisions with enforcement mechanisms
- Whistleblower protections if Plaintiff reports future violations

Standard protections any contractor would require.

TIER TWO: TECHNOLOGICAL REMEDIATION

214. These address Plaintiff's forced career change and leverage his acquired skills

System Improvement Roles for Plaintiff

- Technical advisor on preventing garnishment calculation errors affecting Plaintiff
- Consultant on database integrity for cases involving Plaintiff
- Advisory role on ethical AI implementation for Plaintiff's cases
- Quality assurance reviewer for Plaintiff-related calculations

Compensates Plaintiff while improving systems that harmed him.

215. Educational Pathway Programs

- Paid advisor role for Plaintiff on education-support balance programs
- Consultant on supporting parents pursuing degrees like Plaintiff
- Developer of resources for Plaintiff's unique situation
- Compensation for sharing Plaintiff's lived experience

Transforms Plaintiff's suffering into compensated expertise.

TIER THREE: LONG-TERM SECURITY

216. These ensure Plaintiff's future protection and stability

Monitoring and Oversight Specific to Plaintiff

- Independent review of any future actions against Plaintiff
- Mandatory verification before claims involving Plaintiff
- Right to object before enforcement against Plaintiff
- Annual audits of Plaintiff's case handling

Protects Plaintiff from future targeting.

217. Financial Security Measures

- Structured settlement options for Plaintiff
- Trust fund establishment for Plaintiff's son
- Educational fund for Plaintiff's interrupted studies
- Healthcare coverage for Plaintiff's treatment needs

Provides stability after years of chaos.

TIER FOUR: ACCOUNTABILITY MECHANISMS

218. These ensure violations against Plaintiff never recur

Transparency Requirements for Plaintiff's Case

- Public reporting on Plaintiff's case resolution
- Documentation of reforms prompted by Plaintiff's case
- Acknowledgment of harm caused to Plaintiff

- Commitment to preventing recurrence for Plaintiff

Validates Plaintiff's experience and prevents repetition.

219. Training and Education Using Plaintiff's Case

- Plaintiff as paid consultant on ethics training
- Case study development with Plaintiff's input
- Compensated speaking engagements for Plaintiff
- Advisory board positions for Plaintiff

Converts trauma into compensated teaching opportunities.

Injunctive Relief Valuation

220. The monetary value of comprehensive injunctive relief for Plaintiff could approximate:

- Consulting contracts: \$5-10 million over 10 years
- Career restoration: \$10-20 million in recovered opportunity
- Healthcare and treatment: \$2-5 million lifetime
- Educational funds: \$500,000-\$1 million
- Total injunctive value: \$17.5-36 million

221. Plaintiff would consider substantial injunctive relief as partial substitute for monetary damages, providing alternative resolution pathways that serve both justice and practical reform while compensating Plaintiff for specific harms suffered.

JURY TRIAL DEMAND

Plaintiff demands trial by jury on all claims so triable.

VERIFICATION

I, Marvin Tutt, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that:

1. I am the Plaintiff in this action;
2. I have read the foregoing Complaint;
3. The facts stated herein are true and correct to the best of my knowledge, information, and belief;
4. The exhibits attached hereto are true and correct copies of the documents they purport to be.

Executed on December 23, 2024, at Temple Hills, Maryland.

Marvin Tutt

Plaintiff, Pro Se

marvindtutt@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on _____, 2024, I served a true and correct copy of the foregoing Verified Complaint for Damages, along with all exhibits and a summons, upon the following defendants by the methods indicated:

Regina Robinson

[Address to be provided through counsel]

Method: Personal Service / Certified Mail

State of Maryland c/o Maryland Attorney General

200 St. Paul Place Baltimore, MD 21202

Charles County Child Support Administration

c/o Charles County Attorney

200 Baltimore Street

La Plata, MD 20646

Method: Certified Mail, Return Receipt Requested

Charles County Department of Social Services

c/o Director

200 Kent Avenue

La Plata, MD 20646

Method: Certified Mail, Return Receipt Requested

Charles County, Maryland

c/o County Commissioners

200 Baltimore Street

La Plata, MD 20646

Method: Certified Mail, Return Receipt Requested

Shara Gabrielle Hendler, Esq.

[Address from Maryland Attorney Registration]

Method: Certified Mail, Return Receipt Requested

Andrea Khoury

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

Method: Personal Service / Certified Mail

Mistey L. Metzgar

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

Method: Personal Service / Certified Mail

I further certify that I will file proof of service with the Court upon completion of service on all defendants.

Marvin Tutt

Plaintiff, Pro Se

EXHIBITS

Exhibit A: June 17, 2025 Email Exchange Proving Knowledge and Continuation of Fraud

Exhibit B: Comprehensive Evidence Summary (64 items catalogued by category)

Exhibit B-1: "Smoking Gun" Evidence Summary (Top 10 most damaging items)

Exhibit C: Case No. C-08-FM-22-000821 Docket Entries

Exhibit D: Co-Plaintiff Filing Documents (June 17, 2022)

Exhibit E: Court Transcripts Showing Robinson's Perjury

Exhibit F: Magistrate Assignment Records (Khoury/Metzgar)

Exhibit G: Federal Title IV-D Incentive Payment Documentation

Exhibit H: Medical Records - Fort Washington Hospital Visits

Exhibit I: Employment Verification - WebHead Technologies

Exhibit J: Criminal Court Mandate - Judge Carrington-Martin

Exhibit K: Benefits Denial Letters (UI, SNAP, Medicaid)

Exhibit L: Garnishment Calculations Showing Phantom Income

Exhibit M: Evidence Preservation Demand and Responses

Exhibit N: Timeline of Events with Supporting Documentation

Exhibit O: Plaintiff's Motions Exposing Fraud (2025)

Exhibit P: Communication Attempts with Defendants

Exhibit Q: Supporting Case Law and Legal Precedents

Exhibit R: Damage Calculation Methodology and Support

Exhibit S: Character References and Rehabilitation Evidence

Exhibit T: Additional Supporting Documentation

[Note: All exhibits referenced herein will be filed with the Court either with this Complaint or as soon as practicable thereafter, with appropriate authentication.]

END OF COMPLAINT