



tut <marvindtutt@gmail.com>

[Records Center] Public Records Request :: R000128-111025

MD Governor PIA Portal <governormaryland@govqa.us>

Fri, Dec 12, 2025 at 8:05 PM

To: "marvindtutt@gmail.com" <marvindtutt@gmail.com>

--- Please respond above this line ---



OFFICE OF THE GOVERNOR
Wes Moore

12/12/2025

Pro se Marvin Tutt
5407 Brinkley Road
Temple Hills MD 20748

RE: Public Records Request of November 10, 2025, Reference # R000128-111025

Dear Pro se Marvin Tutt,

The Office of Governor Wes Moore received a public information request from you on November 10, 2025. Your request seeks the following record(s):

"Dear Records Custodian: Pursuant to the Maryland Public Information Act, General Provisions Article Â§ 4-101 et seq., I request the following public records: PART A: VOLUNTARY SEPARATION PROGRAM RECORDS (June 20-30, 2025) 1. All communications, memoranda, emails, text messages, calendar entries, and meeting notes regarding: a. The decision to announce the Voluntary Separation Program on June 24, 2025 b. Any acceleration, modification, or expediting of previously discussed buyout programs c. Changes in the Governor's position from opposing to supporting employee buyouts d. Emergency or unscheduled budget/personnel meetings held June 22-25, 2025 2. All communications between the Governor's Office and: a. Maryland Attorney General's Office b. Department of Budget and Management c. Department of Human Services/DSS d. Child Support Administration e. Maryland Judiciary Specifically regarding state employment, personnel reductions, or legal liability between June 20-30, 2025 3. Any documents containing the terms: a. "Litigation," "legal exposure," "liability," or "risk assessment" in connection with state employment decisions b. "Federal court," "federal lawsuit," or "federal litigation" c. References to case numbers: 8:25-cv-02006, 25-1950, or C-08-FM-22-000821 d. "Emergency" or "expedite" in connection with the buyout announcement 4. Records showing: a. When the Voluntary Separation Program was first proposed internally b. When the decision was finalized to proceed c. Any analysis of legal risks or litigation exposure influencing timing d. Departments or positions prioritized for buyout offers PART B: RECORDS CONCERNING MARVIN D. TUTT 5. ALL records from January 1, 2025 to present that mention, reference, or concern: a. "Marvin Tutt" or "Marvin D. Tutt" b. Federal case 8:25-cv-02006-DKC or 8:25-cv-02006-TDC c. Fourth Circuit case 25-1950 d. Charles County Case No. C-08-

FM-22-000821 6. All communications regarding me between the Governor's Office and: a. Office of the Attorney General b. Maryland Judiciary (including any judges or magistrates) c. Department of Human Services/Department of Social Services d. Child Support Administration (state or county level) e. Department of Budget and Management f. Maryland Department of Labor/Unemployment Insurance 7. Any legal analysis, risk assessment, or strategy documents regarding: a. My federal civil rights lawsuit b. My Fourth Circuit appeal c. My allegations of conspiracy or fraud d. My public information act requests e. Potential state liability related to my claims 8. Records of any Westlaw alerts, case monitoring, or legal research regarding me or my cases 9. Any records showing connection between: a. My June 23, 2025 federal filing and the June 24, 2025 buyout announcement b. My litigation and personnel decisions c. My cases and risk management strategies PART C: PRESERVATION AND PRODUCTION 10. This request includes all records in any format including: - Emails (including metadata and headers) - Text messages (including Signal, WhatsApp, Teams) - Handwritten notes later discarded (if transcribed or photographed) - Calendar entries and meeting invitations - Draft documents even if not finalized - Voice messages or recorded calls (if transcribed) PRESERVATION DEMAND: Please immediately preserve all potentially responsive records, including those on personal devices if used for state business. FORMAT: Please provide records electronically in searchable PDF format where possible. FEE WAIVER REQUEST: I request a complete fee waiver as: 1. I am indigent (currently unemployed and subject to garnishments) 2. This request serves significant public interest in government accountability 3. These are primarily records about myself, for which I have a personal right of access If a fee waiver is denied, please notify me before processing if costs will exceed \$50. TIME PERIOD: For Part A (Buyout): June 20-30, 2025 For Part B (Records about me): January 1, 2025 to present EXPEDITED PROCESSING: I request expedited processing as these records relate to ongoing federal appellate litigation with briefing deadlines (Case No. 25-1950). Please acknowledge receipt of this request within 10 days as required by law. The statutory response deadline is 30 days from receipt. If any records are withheld, please provide: 1. A description of each withheld record 2. The specific statutory exemption claimed 3. An explanation of how the exemption applies This request is being filed simultaneously with similar requests to the Public Access Ombudsman and Maryland Department of Labor to ensure comprehensive production regarding matters currently before the U.S. Court of Appeals for the Fourth Circuit. I declare under penalty of perjury that the foregoing is true and correct. Respectfully submitted, Marvin D. Tutt Date: November 10, 2025 Contact: Email only at marvindtutt@gmail.com (I do not maintain a phone number and request written communications only)"

The Office of Governor Wes Moore has reviewed its files and has located responsive records to your request. The responsive records have been included as an attachment to this letter. The Office of the Governor is withholding certain documents as described below.

PART A: VOLUNTARY SEPARATION PROGRAM RECORDS (June 20-30, 2025) 1. All communications, memoranda, emails, text messages, calendar entries, and meeting notes regarding: a. The decision to announce the Voluntary Separation Program on June 24, 2025 b. Any acceleration, modification, or expediting of previously discussed buyout programs c. Changes in the Governor's position from opposing to supporting employee buyouts d. Emergency or unscheduled budget/personnel meetings held June 22-25, 2025.

The Office of the Governor is withholding all responsive records that constitute records exchanged in connection with deliberative decision-making, which we are withholding under GP § 4-301(a)(1), and also as inter-agency memoranda exempt from disclosure under GP § 4-344. In accordance with GP § 4-343, the disclosure of these materials would be contrary to the public interest because it would discourage deliberative communication with the Governor's Office and would thus undermine the Governor's receipt of full and frank information, communication, and/or advice. These records have been withheld in their entirety because it was not possible to redact only part of the information contained within the record. See GP § 4-203(c)(1)(i).

2. All communications between the Governor's Office and: a. Maryland Attorney General's Office b. Department of Budget and Management c. Department of Human Services/DSS d. Child Support Administration e. Maryland Judiciary Specifically regarding state employment, personnel reductions, or legal liability between June 20-30, 2025

The Office of the Governor is withholding all responsive records that constitute (1) any records that constitute personnel records, which we are prohibited from disclosing under GP § 4-311; (2) records exchanged with the Office of the Attorney General that constitute attorney-client privileged communications under GP § 4-301(a)(1); and (3) records exchanged with State officials that were made in connection with deliberative decision-making, which we are withholding under GP § 4-301(a)(1), and also as inter-agency memoranda exempt from disclosure under GP § 4-344. In accordance with GP § 4-343, the disclosure of these materials would be contrary to the

public interest because it would discourage deliberative communication with the Governor's Office and would thus undermine the Governor's receipt of full and frank information, communication, and/or advice. These records have been withheld in their entirety because it was not possible to redact only part of the information contained within the record. See GP § 4-203(c)(1)(i).

3. Any documents containing the terms: a. "Litigation," "legal exposure," "liability," or "risk assessment" in connection with state employment decisions

The Office of the Governor is withholding all responsive records that constitute (1) records exchanged with the Office of the Attorney General or legal counsel that constitute attorney-client privileged communications under GP § 4-301(a)(1); and (2) records exchanged with State officials that were made in connection with deliberative decision-making, which we are withholding under GP § 4-301(a)(1), and also as inter-agency memoranda exempt from disclosure under GP § 4-344. In accordance with GP § 4-343, the disclosure of these materials would be contrary to the public interest because it would discourage deliberative communication with the Governor's Office and would thus undermine the Governor's receipt of full and frank information, communication, and/or advice. These records have been withheld in their entirety because it was not possible to redact only part of the information contained within the record. See GP § 4-203(c)(1)(i).

b. "Federal court," "federal lawsuit," or "federal litigation" c. References to case numbers: 8:25-cv-02006, 25-1950, or C-08-FM-22-000821 d. "Emergency" or "expedite" in connection with the buyout announcement

4. Records showing: a. When the Voluntary Separation Program was first proposed internally b. When the decision was finalized to proceed c. Any analysis of legal risks or litigation exposure influencing timing d. Departments or positions prioritized for buyout offers

The Office of the Governor is withholding all responsive records that constitute (1) records exchanged with the Office of the Attorney General or legal counsel that constitute attorney-client privileged communications under GP § 4-301(a)(1); and (2) records exchanged with State officials that were made in connection with deliberative decision-making, which we are withholding under GP § 4-301(a)(1), and also as inter-agency memoranda exempt from disclosure under GP § 4-344. In accordance with GP § 4-343, the disclosure of these materials would be contrary to the public interest because it would discourage deliberative communication with the Governor's Office and would thus undermine the Governor's receipt of full and frank information, communication, and/or advice. These records have been withheld in their entirety because it was not possible to redact only part of the information contained within the record. See GP § 4-203(c)(1)(i).

If you believe you have been wrongly denied a public record, you may file a request for mediation with the Public Access Ombudsman and, if the Ombudsman is unable able to resolve the matter, you may subsequently seek resolution from the PIA Compliance Board for those matters within the Board's jurisdiction. See, GP §§ 4-1A-01 *et seq.* Alternatively, you may see judicial review of this decision pursuant to GP § 4-362.

Sincerely,

Records Custodian

Executive Office of the Governor

To monitor the progress or update this request please log into the [Office of the Governor Public Information Act Request Center](#)

