

**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.

SECOND AMENDED COMPLAINT - ADDING JUDGE CHUANG IN INDIVIDUAL
CAPACITY

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

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

****MARVIN TUTT****

Plaintiff,

v.

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

Defendants.

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

SECOND AMENDED COMPLAINT

Plaintiff Marvin Tutt files this Second Amended Complaint adding Theodore D. Chuang in his INDIVIDUAL capacity as a defendant for conspiracy and deprivation of civil rights under color of law.

NEW DEFENDANT

****31. THEODORE D. CHUANG, in his individual capacity****

- United States District Judge who conspired with state defendants
- Acted outside judicial capacity to protect co-defendants
- Issued retroactive orders designed to dismiss valid claims
- Coordinated with Maryland officials to deprive civil rights

ADDITIONAL FACTUAL ALLEGATIONS

****247.**** On June 23, 2025, Plaintiff filed this action exposing \$3.2 billion in fraud by Maryland officials.

****248.**** On June 24, 2025, the Department of Justice filed suit against ALL Maryland federal judges, including Defendant Chuang, creating personal stakes in protecting Maryland officials.

****249.**** On July 8, 2025, Defendant Chuang, acting outside his judicial capacity and in conspiracy with state defendants, issued a retroactive Case Management Order designed to prevent Plaintiff from prosecuting valid claims.

****250.**** The Order was not a legitimate exercise of judicial discretion but a coordinated effort to protect co-defendants in the DOJ litigation.

****251.**** Defendant Chuang knew Plaintiff had already filed his case on June 23, yet retroactively imposed requirements that would be impossible to meet.

****252.**** The Order requires fraud victims to create "joint records" with alleged fraudsters - a requirement so absurd it reveals non-judicial motives.

****253.**** Defendant Chuang acted in concert with state defendants as evidenced by:

- Timing immediately after DOJ lawsuit
- Protecting state defendants' interests
- Creating procedural impossibilities

- Ignoring federal rules

****254.**** This conspiracy deprived Plaintiff of:

- Due process rights
- Access to courts
- Equal protection
- Fair adjudication

NEW CAUSES OF ACTION

****COUNT 18: 42 U.S.C. § 1983 - CONSPIRACY TO DEPRIVE CIVIL RIGHTS****

(Against Theodore D. Chuang in Individual Capacity)

****255.**** Plaintiff incorporates all preceding paragraphs.

****256.**** Defendant Chuang, acting under color of law but outside judicial capacity, conspired with state defendants to deprive Plaintiff of constitutional rights.

****257.**** The conspiracy included:

- Issuing retroactive procedural barriers
- Creating impossible requirements
- Protecting co-defendants in DOJ litigation
- Preventing prosecution of valid claims

****258.**** As a direct result, Plaintiff suffered:

- Continued garnishments of \$130/week
- Inability to prosecute claims
- Denial of due process
- Ongoing financial harm

****259.**** Defendant Chuang's actions were willful, malicious, and in bad faith.

****260.**** Plaintiff is entitled to compensatory and punitive damages.

****COUNT 19: 42 U.S.C. § 1985 - CONSPIRACY TO OBSTRUCT JUSTICE****

(Against Theodore D. Chuang in Individual Capacity)

****261.**** Defendant Chuang conspired with state defendants to obstruct justice by preventing Plaintiff from prosecuting valid federal claims.

****262.**** The conspiracy involved using judicial power for non-judicial purposes - protecting conspirators from liability.

****263.**** This obstruction was motivated by Defendant Chuang's personal interest as a co-defendant in DOJ litigation with Maryland officials.

****264.**** Plaintiff suffered actual damages from this obstruction including continued theft of benefits and inability to obtain relief.

PRAYER FOR RELIEF

As to Defendant Chuang in his INDIVIDUAL capacity, Plaintiff seeks:

1. ****Nominal damages of ONE DOLLAR (\$1.00)**** - Plaintiff seeks only \$1 to establish the violation while demonstrating this case is about accountability, not money
2. ****Declaratory judgment**** that Defendant Chuang violated Plaintiff's constitutional rights through discriminatory treatment and failure to recuse
3. ****Permanent injunctive relief****:
 - a. Prohibiting Chuang from presiding over any civil rights cases
 - b. Prohibiting Chuang from presiding over any pro se litigant cases
 - c. Prohibiting Chuang from issuing case management orders targeting specific litigants
 - d. Prohibiting Chuang from creating procedural requirements not found in the Federal Rules
4. ****Mandatory relief requiring Chuang to****:
 - a. Complete 40 hours of judicial bias training
 - b. Submit written acknowledgment of discriminatory conduct to the Fourth Circuit Judicial Council

- c. Report this matter to the Circuit Judicial Council
 - d. Provide written apology to Plaintiff acknowledging the violations
5. ****Systemic relief****:
- a. Order independent audit of Chuang's treatment of pro se litigants for the past 5 years
 - b. Require disclosure of this case in any future matters involving pro se parties
 - c. Public filing of audit results to ensure transparency
6. ****Attorney's fees**** under 42 U.S.C. § 1988 (if counsel obtained)
7. ****Costs of this action****
8. ****All other relief**** deemed just and proper

WHY ONLY ONE DOLLAR

Plaintiff seeks only \$1.00 in damages from Judge Chuang to establish:

- 1. ****This case is about principle, not profit**** - Plaintiff wants accountability, not enrichment
- 2. ****The violation itself matters more than compensation**** - Constitutional rights are priceless
- 3. ****Credibility through restraint**** - No one can claim this is a money grab
- 4. ****Focus on systemic change**** - The injunctive relief matters more than damages
- 5. ****Pure motive**** - A judge who violates rights should be stopped, not just fined

The single dollar makes clear: This is about justice, not jackpots.

THE UNPRECEDENTED NATURE OF THIS CLAIM

****This may be the first case in American jurisprudence where:****

- A litigant sues their presiding judge
- In the same case the judge is managing
- While the judge continues presiding
- For conspiracy with opposing parties
- Creating an impossible logical loop

****The absurdity proves the point**:** No judge can fairly preside over a case where he is a defendant accused of conspiring with the other defendants.

****Respectfully submitted,****

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Email: owner@caiatech.com

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

VERIFICATION

I, Marvin Tutt, verify under penalty of perjury that:

1. I have read this Second Amended Complaint
2. The factual allegations are true to the best of my knowledge
3. The claims are brought in good faith
4. I understand the serious nature of suing a federal judge

/s/ Marvin Tutt

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

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I served a true and correct copy of the foregoing Second Amended Complaint upon the following parties via certified mail and first-class mail:

Charles County Child Support Administration

200 Kent Avenue
La Plata, MD 20646

Charles County Department of Social Services
200 Kent Avenue
La Plata, MD 20646

State of Maryland
c/o Office of the Attorney General
200 Saint Paul Place
Baltimore, MD 21202

Charles County, Maryland
200 Charles Street
La Plata, MD 20646

Shara Gabrielle Hendler, Esq.
c/o Charles County Child Support Administration
200 Kent Avenue
La Plata, MD 20646

Andrea Khoury
c/o Charles County Circuit Court

200 Charles Street
La Plata, MD 20646

Mistey L. Metzgar
c/o Charles County Circuit Court
200 Charles Street
La Plata, MD 20646

****The Honorable Theodore D. Chuang****

IN HIS INDIVIDUAL CAPACITY
c/o U.S. District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, MD 20770

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