

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

**MARVIN TUTT,
Plaintiff,**

Civil Action No. _____

v.

**REGINA ROBINSON, et al.,
Defendants.**

PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS TO ALL DEFENDANTS

Plaintiff Marvin Tutt hereby serves the following discovery requests upon all Defendants pursuant to Federal Rules of Civil Procedure 26, 30, 31, 33, 34, and 36. These requests are continuing in nature and require supplementation under Rule 26(e).

NOTICE TO ALL PARTIES

Criminal Investigation Notice: The conduct alleged in this case has been referred to federal law enforcement agencies, including the Federal Bureau of Investigation and the Health and Human Services Office of Inspector General, for investigation of potential federal program fraud, conspiracy, and civil rights violations.

Evidence Preservation Warning: Destruction or alteration of any responsive materials may constitute obstruction of justice under 18 U.S.C. § 1519 and will result in immediate sanctions, adverse inference instructions, and criminal referral.

Ongoing Harm Notice: Defendants continue to commit weekly violations through fraudulent garnishments. Time is of the essence in all discovery matters.

Document Production Notice: Pursuant to Fed. R. Civ. P. 34(b)(2)(E)(i), all documents must be organized and labeled to correspond to the categories in this request.

DEFINITIONS

1. **"Co-Plaintiff Arrangement"** refers to the unprecedented filing on June 17, 2022, listing Charles County Child Support Administration and Regina Robinson as co-plaintiffs in Case No. C-08-FM-22-000821.
 2. **"Garnishment Calculation"** means any determination of amounts to be withheld from Plaintiff's income, including but not limited to the ongoing \$138/week garnishment from unemployment benefits based on phantom employment income.
 3. **"The Conspiracy Period"** means June 17, 2022 through the present date.
 4. **"Communications"** includes all forms of contact: emails, text messages, phone calls, voicemails, meetings, video conferences, memoranda, notes, calendar entries, instant messages, database entries, and any other form of information exchange.
 5. **"Documents"** includes all writings, drawings, graphs, charts, photographs, recordings, and data compilations from which information can be obtained, including electronically stored information (ESI) in all forms.
 6. **"Phantom Income"** refers to any income attributed to Plaintiff that he did not actually receive, including the \$82,000 annual salary used to calculate current garnishments despite unemployment status.
 7. **"Ex Parte Communications"** means any communications about Plaintiff's case conducted outside his presence or without notice to him.
 8. **"Title IV-D"** refers to the federal child support enforcement program and all associated funding, incentives, and performance metrics.
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I. NOTICES OF DEPOSITION

Plaintiff will take the following depositions at a mutually agreeable time and place, but no later than 60 days from service of these requests:

A. Rule 30(b)(6) Depositions

1. Charles County Child Support Administration

Topics INCLUDING BUT NOT LIMITED TO:

- The complete decision-making process leading to the co-plaintiff arrangement with Regina Robinson.

- All instances where CSEA has filed as co-plaintiff with any private party in its history.
- Garnishment calculation methodologies, including manual overrides and phantom income entries.
- Federal Title IV-D incentive payment calculations, certifications, and maximization strategies.
- Training materials, policies, and procedures regarding federal funding optimization.
- Communication protocols between CSEA and judicial officers.
- Policies and procedures for providing legal representation to private parties.
- Database systems, cross-agency data sharing, and information propagation protocols.
- The specific calculation using \$82,000 phantom income for current garnishments.
- The complete failure to garnish WebHead Technologies wages despite knowledge of employment.
- Performance metrics, bonus structures, and personnel evaluations tied to collection rates.
- All third-party contracts, consultants, and advisory services.
- Interstate data sharing agreements and multi-state coordination.

2. Charles County Department of Social Services

Topics INCLUDING BUT NOT LIMITED TO:

- Benefits denial processes and criteria for child support obligors.
- Cross-database flagging systems and automated denial protocols.
- Andrea Khoury's complete employment history, responsibilities, and transition timeline.
- All communications between DSS and CSEA regarding Plaintiff.
- Phantom income data creation, maintenance, and system propagation.
- Training programs on federal funding streams and performance optimization.
- Policies regarding employee transitions to judicial positions.
- All personnel with access to Plaintiff's records across all systems.
- Federal audit reports, compliance issues, and corrective actions.

3. Charles County Circuit Court

Topics INCLUDING BUT NOT LIMITED TO:

- Case assignment procedures and protocols for former agency employees.
- All policies regarding co-plaintiff cases in family court proceedings.
- Training provided to magistrates on procedural requirements and ethics.
- Recording, preservation, and access policies for court proceedings.
- Scheduling protocols and coordination with attorney appearances.
- Magistrate recusal policies, procedures, and historical applications.
- Administrative staff roles, responsibilities, and system access.
- All court personnel with access to case management systems.

B. Individual Depositions

1. Andrea Khoury

- Complete DSS employment history (2013-2022) with all positions and responsibilities.
- Transition process to magistrate position including any cooling-off period discussions.
- Prior knowledge of co-plaintiff arrangement before presiding over case.
- All communications with former DSS/CSEA colleagues regarding any matters.
- Understanding of garnishment calculations and federal funding implications.
- Basis for each ruling made in Case No. C-08-FM-22-000821.
- Any ex parte communications regarding Plaintiff or his case.
- Training received on judicial ethics, recusal requirements, and procedural rules.

2. Mistey L. Metzgar

- Complete basis for statement "You'll never get this terminated" before hearing evidence.
- Source and authority for claimed 10-day response rule.
- Understanding of Maryland courts' subpoena powers for financial records.
- All communications with other magistrates or court personnel about Plaintiff.
- Training received on procedural notice requirements and due process.
- Knowledge of garnishment calculation methods and review procedures.
- Any ex parte communications regarding Plaintiff's case.
- Understanding of constitutional protections and procedural requirements.

3. Regina Robinson

- Process by which she obtained attorney representation.
- Who contacted her about legal representation and when.
- Financial arrangements for legal services including who paid.
- All communications with CSEA before and after co-plaintiff filing.
- Understanding of what co-plaintiff status meant.
- Basis for all custody and employment representations made to court.
- Knowledge of garnishment calculations and collection amounts.
- Any promises or inducements made to secure cooperation.

4. Shara Gabrielle Hendler, Esq.

- Complete engagement history for both CSEA and Robinson representation.
- Fee arrangements, payments received, and billing records.
- All communications regarding the co-plaintiff arrangement.
- Ethical considerations and conflicts analysis for dual representation.
- Specific reasons for withdrawal from representation in May 2023.
- Knowledge of any false statements made during representation.
- All strategic discussions regarding the prosecution.
- Any concerns raised about the arrangement's propriety.

5. John/Jane Doe CSEA Representatives (to be identified)

- Participation in hearings despite plaintiff status.
- Communications with magistrates outside court proceedings.
- Understanding of conflict of interest issues.
- Knowledge of garnishment calculation methods.
- Role in federal funding certifications.

6. John/Jane Doe DSS Database Administrators (to be identified)

- System architecture and data sharing protocols.
- Creation and maintenance of phantom income records.
- Cross-agency data propagation methods.
- Access logs and modification histories.
- Federal compliance and audit procedures.

II. INTERROGATORIES

(Limited to 25 per party under Rule 33)

To All Governmental Defendants:

1. Identify every case in Maryland history where a government agency has filed as co-plaintiff with a private citizen, including case numbers, dates, parties, outcomes, and current status.
2. Describe in complete detail the decision-making process that led to CSEA filing as co-plaintiff with Regina Robinson on June 17, 2022, including all participants, meetings, communications, and approvals.
3. Identify every person who participated in, approved, or had knowledge of the co-plaintiff arrangement, including their titles, roles, and specific involvement.
4. Explain in detail how Regina Robinson obtained legal representation from Shara Gabrielle Hendler, including who initiated contact, when, and all financial arrangements.
5. Calculate and describe all federal Title IV-D funding received during the Conspiracy Period, including how Plaintiff's case affected funding amounts and performance metrics.
6. Explain the complete mathematical calculation resulting in \$138/week garnishment from \$430/week unemployment when Plaintiff's last employment paid \$82,000/year.

7. Identify all databases and systems that share information between agencies regarding child support obligors, including technical specifications and access controls.
 8. Detail every instance where Plaintiff was denied benefits (unemployment, SNAP, Medicaid) including specific reasons, personnel involved, and data sources used.
 9. Identify and describe all communications between judicial officers and agency representatives regarding Plaintiff outside of formal court proceedings.
 10. Explain in complete detail why CSEA was unable to garnish wages from WebHead Technologies despite knowledge of employment at \$82,000/year.
 11. For each person involved in the co-plaintiff arrangement, state their current employment status, any promotions received, and any performance-based compensation.
 12. Identify all federal audits, reviews, or investigations of your agency during the Conspiracy Period and any findings related to collection practices.
 13. Describe all training programs related to federal funding maximization, collection optimization, or performance metrics.
 14. Identify all third-party vendors, consultants, or contractors who provided services related to child support enforcement or federal funding.
 15. Explain all circumstances under which phantom income can be entered or maintained in agency systems.
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To Individual Magistrate Defendants:

16. Identify the complete source of any claim that parties have only 10 days to respond to court matters without formal notice.
17. Describe all communications with any person regarding Plaintiff or his case outside of formal proceedings.
18. Identify all training received on recusal requirements, especially regarding former agency employment.
19. Explain your complete understanding of Maryland courts' authority to subpoena financial records.

20. Describe any performance evaluations, reviews, or feedback related to child support cases.
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To Regina Robinson:

21. Describe in detail every communication with any person regarding becoming a co-plaintiff with CSEA.
 22. Identify who paid for your legal representation and all amounts paid.
 23. Explain your understanding of what it meant to be a co-plaintiff with a government agency.
 24. Describe all promises, assurances, or benefits offered in connection with the litigation.
 25. Identify all persons who advised you regarding your testimony or participation.
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III. REQUESTS FOR PRODUCTION OF DOCUMENTS

To All Defendants:

1. All documents relating to the decision to file CSEA and Robinson as co-plaintiffs.
2. All communications between any defendants regarding Plaintiff, his case, or garnishment calculations.
3. All policies, procedures, guidelines, or precedents regarding co-plaintiff arrangements.
4. All audio and video recordings of all proceedings in Case No. C-08-FM-22-000821.
5. All documents showing garnishment calculations for Plaintiff from 2022 to present.
6. All database records showing Plaintiff's income across all systems and time periods.
7. All documents relating to attempts to garnish wages from WebHead Technologies or payroll company "EmployerFlexible".

8. All training materials regarding Title IV-D funding, incentive payments, or collection strategies.
9. All calendar entries, scheduling records, and appearance documentation for Plaintiff's case.
10. All documents showing benefits applications and denials for Plaintiff.
11. Andrea Khoury's complete personnel file and all documents relating to her transition to magistrate.
12. All recusal policies and any recusal considerations for Plaintiff's case.
13. All emails, text messages, and instant messages containing: "Tutt," "co-plaintiff," "garnishment," "override," "Title IV-D," "incentive," or "performance."
14. All documents relating to Shara Gabrielle Hendler's representation of any party.
15. All phone records showing communications between defendants during the Conspiracy Period.
16. All organizational charts showing reporting structures and personnel changes.
17. All contracts with third-party vendors related to child support enforcement.
18. All federal audit reports, compliance reviews, and corrective action plans.
19. All documents showing performance metrics, bonuses, or incentives tied to collections.
20. All interstate data-sharing agreements and multi-state coordination documents.
21. All documents identifying personnel who received any benefit from Plaintiff's case.
22. All access logs showing who viewed or modified Plaintiff's records.
23. All documents relating to the ongoing garnishment of unemployment benefits.
24. All communications with federal oversight agencies during the Conspiracy Period.

IV. REQUESTS FOR ADMISSION

To Charles County Child Support Administration:

1. Admit that CSEA filed as co-plaintiff with Regina Robinson on June 17, 2022.
 2. Admit that this co-plaintiff arrangement was unprecedented in Maryland history.
 3. Admit that Shara Gabrielle Hendler represented both CSEA and Robinson.
 4. Admit that CSEA receives federal funding based on child support collections.
 5. Admit that higher collections result in increased federal funding.
 6. Admit that CSEA was unable to garnish Plaintiff's wages from WebHead Technologies.
 7. Admit that current garnishment calculations use phantom income of \$82,000 annually.
 8. Admit that Plaintiff's actual income is \$430/week in unemployment benefits.
 9. Admit that the \$138/week garnishment represents 32% of Plaintiff's actual income.
 10. Admit that CSEA continues garnishment despite notice of fraud allegations.
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To Magistrate Defendants:

11. Admit that you never provided written notice of any deadline to Plaintiff.
 12. Admit that Maryland courts have authority to subpoena financial records.
 13. Admit that you were aware of the co-plaintiff arrangement when presiding.
 14. Admit that you made statements about case outcomes before reviewing evidence.
 15. Admit that you have communicated with agency representatives about Plaintiff.
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To Regina Robinson:

16. Admit that you did not personally pay for Shara Gabrielle Hendler's services.

17. Admit that you were contacted by others about filing suit against Plaintiff.
 18. Admit that you filed as co-plaintiff with a government agency.
 19. Admit that you made representations about custody that were inaccurate.
 20. Admit that you made representations about employment that were inaccurate.
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V. ELECTRONIC DISCOVERY SPECIFICATIONS

Given the digital nature of the conspiracy and phantom income schemes, Plaintiff requires production in the following formats:

1. **Databases:** Native format with full schema documentation
 2. **Emails:** PST/MBOX format with complete headers and metadata
 3. **Documents:** Native format with all metadata preserved
 4. **Audio/Video:** Original quality with no compression
 5. **System Logs:** Raw log files with parsing documentation
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VI. PRESERVATION NOTICE

All parties are reminded of their continuing obligation to preserve ALL potentially relevant evidence, including but not limited to:

- All electronic communications (including deleted items)
- All database records and audit logs
- All handwritten notes and physical documents
- All audio and video recordings
- All backup media and archived data
- All metadata and system logs

WARNING: Federal law enforcement agencies have been notified of this case. Destruction of evidence may result in criminal prosecution under 18 U.S.C. § 1519 (obstruction of justice) and other applicable statutes.

VII. CONFIDENTIALITY AND PROTECTIVE ORDERS

Plaintiff will consider reasonable protective orders for genuinely sensitive information. However, defendants may not use blanket claims of privilege to avoid producing:

- Evidence of wrongdoing or fraud
 - Administrative documents and procedures
 - Communications outside judicial proceedings
 - Factual information about calculations
 - Training materials and policies
 - Federal compliance documents
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VIII. MEET AND CONFER

Plaintiff is available to meet and confer regarding these discovery requests as required by Rule 37, within seven (7) days of any dispute arising. However, given the ongoing weekly theft through garnishment and the documented pattern of fraud, Plaintiff expects prompt and complete responses.

IX. RESERVATIONS

Plaintiff reserves the right to:

- Supplement these discovery requests
 - Seek additional discovery based on responses
 - Move to compel production
 - Seek sanctions for non-compliance
 - Amend the complaint based on discovered evidence
 - Pursue all available remedies
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CERTIFICATE OF SERVICE

I hereby certify that on _____, 2025, I served this Discovery Request on all defendants via [method of service].

Marvin Tutt
Plaintiff Pro Se
5407 Brinkley Road

NOTICE TO DEFENDANTS

Response Deadline: Responses are due within 30 days under Federal Rules of Civil Procedure.

Consequences of Non-Compliance:

- Motion to Compel under Rule 37
- Monetary sanctions
- Adverse inference instructions
- Entry of default judgment
- Contempt proceedings
- Criminal referral for obstruction

Ongoing Harm: Given the continuing constitutional violations through weekly garnishments and the fresh psychological trauma from discovering this intentional conspiracy, time is of the essence in all discovery matters.

Settlement Opportunity: Defendants may still avoid the expense and exposure of full discovery through good faith settlement discussions. This opportunity diminishes with each day of continued violations.

END OF DISCOVERY REQUESTS