

**IN THE CIRCUIT COURT FOR CHARLES COUNTY
FAMILY DIVISION**

**CHARLES COUNTY CHILD SUPPORT ADMINISTRATION
REGINA ROBINSON
Plaintiff,**

v.

**MARVIN TUTT
Defendant.**

Case No.: C-08-FM-22-000821

EMERGENCY MOTION FOR RECUSAL AND DISQUALIFICATION OF MAGISTRATE
ANDREA KHOURY IN CASE NO. C-08-FM-22-000821

I, Marvin Tutt, respectfully move this Court for the immediate recusal and disqualification of Magistrate Andrea Khoury pursuant to Maryland Rule 1-311 and the Due Process Clause of the Fourteenth Amendment.

I. THE DISQUALIFYING CONFLICT

I cannot and will not appear before Magistrate Khoury. The undisputed facts establish an insurmountable conflict of interest:

1. Magistrate Khoury was employed by the Charles County Department of Social Services from 2013-2022 - nine years as legal counsel, then immediately presided over my case in which her

colleagues/clients are **plaintiffs** against me. The docket clearly says “Charles County Child Support Administration, **et al.** vs. Marvin Tutt”

2. DSS is the parent agency of Charles County Child Support Administration - the plaintiff in this case

3. I have pending federal civil rights claims against both DSS and CSA in Case No.

8:25-cv-02006-DKC

4. Magistrate Khoury transitioned directly from DSS counsel to presiding magistrate with zero cooling-off period

II. MANDATORY DISQUALIFICATION UNDER MARYLAND LAW

Maryland Rule 1-311 requires disqualification when "the judge has a personal interest in the matter in controversy."

I filed federal civil rights claims because my constitutional rights were violated systematically. Now the same people want to sit as judges in their own misconduct. Defendant can not appear before anyone he is actively litigating.

IV. THE TIMELINE PROVES RETALIATION AND COORDINATION

The facts speak for themselves:

- June 23, 2025: I named Khoury in federal civil rights action

- July 24, 2025: Federal case dismissed by Judge Chasanow (unconstitutionally, alleged by Marvin Tutt)

- August 2025: Charles County immediately assigns Khoury to preside over my case

This is textbook retaliation for exercising First Amendment rights to access federal courts.

V. GOOD FAITH CONCERN FOR ALL PARTIES

I file this motion with genuine concern for everyone involved, including Magistrate Khoury herself. Proceeding with this obvious conflict would:

- Violate her oath of office to provide impartial justice
- Create reversible error voiding any orders issued
- Expose her to federal liability for civil rights violations
- Damage the integrity of Charles County's judicial system

VI. THE IMPOSSIBILITY REQUIRES NEUTRAL REVIEW

The core issue in this case involves multiple separate instances of fraud such as garnishing unemployment benefits based on a \$82,000 salary from someone unemployed for over 18 months, and allowing Regina Robinson to commit perjury- fraud upon the court by lying about income and custody arrangements. Upon the defendant reporting these crimes through court motions, a "modification" hearing was scheduled. Defendant was told he only had 10 days to make corrections, to which the defendant responded there is no time limit for fraud upon the court. Defendant also cited Maryland and federal laws in his motions, which were not

acknowledged by the court. The court failed to review an existing mandate that caused impossible conditions that defendant claims violated several human rights. The court made no attempt to correct these violations, despite being notified numerous times through the correct procedure and channels. These are just some of the many systemic violations Marvin Tutt is alleging.

Any hearings require a neutral magistrate or judge who:

- Has no personal interest in the outcome
- Was not involved in creating the fraudulent calculations
- Can objectively review the fraud and civil rights violations.
- Must be based on a petition that

Magistrate Khoury, as former DSS counsel, and plaintiff in the federal case cannot provide this neutrality.

VII. RELIEF REQUESTED

WHEREFORE, I respectfully request this Court:

1. IMMEDIATELY DISQUALIFY Magistrate Khoury from all proceedings in this case
2. STAY ALL PROCEEDINGS until conflict is resolved
3. ACKNOWLEDGE the constitutional violations and take steps to prevent recurrence

VIII. CONCLUSION

I am seeking to protect the constitutional principle that former counsel cannot sit as judges in their client's cases. This principle exists to protect everyone - including the magistrates themselves. The conflict is undeniable. The law is clear. Justice demands recusal. CSA is listed as PLAINTIFF in case C-08-FM-22-000821. Meaning they waived all rights as a neutral enforcer or "ex rel" relationship. Evident through Maryland case search and several court documents. Additionally, this court is attempting to allow defendants to preside over their accuser. This alone is unbelievable.

/s/ Marvin Tutt

Marvin Tutt

Email: owner@caiatech.com

Date: Aug 19, 2025

CERTIFICATE OF SERVICE

I hereby certify that on Aug 19, 2025, I served a true and correct copy of this Emergency Motion for Recusal in person to:

Charles County Circuit Court

Address: 200 Charles St, La Plata, MD 20646

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Marvin Tutt

Marvin Tutt

Date: Aug 19, 2025