

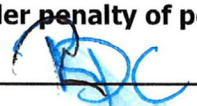


U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

CHARGE OF DISCRIMINATION

For Official Use Only – Charge Number:

EEOC Form 5A (August 2023)

Personal Information	First Name: <u>Ryan</u> MI: <u>A</u> Last Name: <u>Dillon-Capps</u> Address: <u>1334 Maple Avenue</u> Apt.: _____ City: <u>Essex</u> County: <u>Baltimore</u> State: <u>MD</u> Zip Code: <u>21221</u> Phone: <u>703-303-1113</u> Home <input type="checkbox"/> Work <input type="checkbox"/> Cell <input checked="" type="checkbox"/> Email: <u>ryan@mxt3.com</u>
Who do you think discriminated against you?	Employer <input checked="" type="checkbox"/> Union <input type="checkbox"/> Employment Agency <input type="checkbox"/> Other Organization <input type="checkbox"/> Organization Name: <u>Ohana Growth Partners, LLC</u> Address: <u>212 West Padonia Road</u> Suite: _____ City: <u>Timonium</u> State: <u>MD</u> Zip Code: <u>21093</u> Phone: <u>410-252-8058</u>
Why you think you were discriminated against?	Race <input type="checkbox"/> Color <input type="checkbox"/> Religion <input type="checkbox"/> Sex <input checked="" type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Pregnancy <input type="checkbox"/> Disability <input checked="" type="checkbox"/> Genetic Information <input type="checkbox"/> Retaliation <input checked="" type="checkbox"/> Other <input type="checkbox"/> (specify) _____
What happened to you that you think was discriminatory?	Date of most recent job action you think was discriminatory: <u>2/13/25</u> Also describe briefly each job action you think was discriminatory and when it happened (estimate). See Attached Document.
Signature and Verification	I understand this charge will be filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address, phone, or email. I will cooperate fully with them in the processing of my charge in accordance with their procedures. I understand by signing below that I am filing a charge of employment discrimination with the EEOC. I understand that the EEOC is required by law to give a copy of the charge, which includes my allegations and my name, to the organization named above. I also understand that the EEOC can only investigate charges of job discrimination based on race, color, religion, sex, national origin, age, disability, genetic information, or based on retaliation for filing a charge of job discrimination, participating in an investigation of a job discrimination complaint, or opposing job discrimination. I declare under penalty of perjury that the above is true and correct. Signature: <u></u> Date: <u>May 7, 2025</u>

EEOC Complaint

1. **2020–2024 – Gender-Based Disparate Treatment in Communication Feedback:**

I was repeatedly subjected to collateral attacks concerning my communication style, which was criticized for not aligning with that of male executives. My supervisor directed me to adopt a more “masculine” manner of communication, stating that this was part of the company’s culture and expectations. The instructions were explicit: (1) swear more often; (2) use “smaller words”; and (3) use “fewer words.”

2. **October 16, 2023 – Reporting Accounting Irregularities:**

After reporting accounting irregularities to CFO Glenn Norris on October 16, 2023, the prior efforts to minimize the gender-based communication feedback (noted in #1) were undone, and the retaliatory behavior escalated.

3. **November 10, 2023 – Retaliation Following HR Complaint:**

I submitted a formal HR complaint on November 10, 2023, which included a third-party witness. HR responded by (a) informing at least two of the subjects of my complaint; (b) refusing to accept my written report; and (c) imposing an unduly burdensome process that required separate forms for each incident and each actor involved. HR falsely claimed they had no record of my prior reports, requiring me to recreate the record retroactively.

4. **March 2024 – Outside Counsel Retaliation and Closure of HR Investigation:**

The company engaged an outside law firm to manufacture pretext for terminating me. When I raised objections to the legitimacy of this effort, the internal HR investigation was closed in retaliation.

5. **June 2024 – Closure of Fraud Investigation in Retaliation for Labor Dispute Inquiries:**

The law firm’s stated pretext for involvement was to investigate the fraud I had reported in December 2023. When I contacted that same firm in June 2024 to seek a negotiated resolution to the hostile work environment and labor dispute, the fraud investigation was closed in further retaliation.

6. **January 2024 – FMLA and ADA Leave in Response to Worsening PTSD:**

The escalating hostility from the events in October through December 2023 triggered worsening symptoms of PTSD. This resulted in my healthcare provider certifying both intermittent FMLA leave and a work-from-home ADA accommodation due to the hostile work environment associated with continued exposure to the individuals involved in #1 through #5.

7. **January–July 2024 – FMLA Interference and Pretextual Planning for Termination:**

Although my FMLA leave and ADA work-from-home accommodation were approved, the employer simultaneously began a course of conduct aimed at terminating me on July 30, 2024. Management routinely interfered with my FMLA leave every time I gave notice of my intent to use it, in furtherance of their pretextual justification for separation.

8. **June 13, 2024 – Escalation and Retaliation During Labor Dispute:**

As the labor dispute intensified, I sent a formal cease-and-desist letter on June 13, 2024, objecting to interference with my FMLA leave that day. After I sent a 2:05 PM escalation email to ownership, Richard Hartman (Head of HR) retaliated by placing another labor dispute participant, Darren Koritzka, on involuntary administrative leave.

9. **June 13, 2024 – Suspension for Seeking Protection:**

Later that evening, I informed Justin Drummond (President) that if the retaliation was not addressed, I would be forced to file for a peace order. In response, I was suspended from employment.

10. **June 14, 2024 – Fraudulent State Court Action to Preempt Peace Order:**

The next day, Ohana Growth Partners, LLC filed a fraudulent lawsuit against me, not to resolve a genuine dispute, but to preempt my filing of a protective peace order. Their intention was to create a procedural record that would cast my petition as retaliatory. I am the prevailing party in that state action.

11. **June 2024 – Insertion of Gender-Based Pretext in Court Filings:**

During the course of the state court proceedings, Richard Hartman inserted allegations that I had “recently informed others of a pronoun preference.” This was introduced to create a defensive pretext and discredit any pending or potential gender discrimination claim.

12. **February 13, 2025 – Federal Retaliation and Judicial Corruption:**

As a result of the retaliation in #10–11, I filed a federal lawsuit that necessarily included additional defendants: the company’s outside counsel, multiple Maryland state judges, the court clerk, and members of the state’s ethics body. The presiding federal judge, Brendan A. Hurson, had failed to disclose his personal and professional ties to multiple individuals named as defendants, including a previously concealed seven-figure financial connection and involvement in Judge Hurson’s elevation to Article III status. Judge Hurson also inserted a similar pronoun reference in his ruling, reinforcing the same prejudicial narrative initiated by the employer’s filings in the state court.

Ryan Dillon-
Capps

Digitally signed by Ryan
Dillon-Capps
Date: 2025.05.07
14:31:27 -04'00'



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Baltimore Field Office
31 Hopkins Plaza, Suite 1432
Baltimore, MD 21201
(410) 801-6685
Website: www.eeoc.gov

DISMISSAL AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 05/08/2025

To: Ryan A. Dillon-Capps
1334 Maple Avenue
Essex, MD 21221

Charge No: 531-2025-00653

EEOC Representative and email: Legal Unit
(267) 589-9707

DISMISSAL OF CHARGE

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 531-2025-00653.

On behalf of the Commission,

Digitally Signed By: Karen McDonough
05/08/2025

Karen McDonough
Acting Director

CC:

Karen Debus
Ohana Growth Partners, LLC
212 West Padonia Road
Timonium, MD 21093

Please retain this notice for your records.