

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MARYLAND

RYAN DILLON-CAPPS

*Plaintiff,*

vs.

OHANA GROWTH PARTNERS, LLC et *al*

*Defendants*

) Civil Action

) No. \_\_\_\_\_

) Hon. \_\_\_\_\_

COMPLAINT INTEGRATED APPENDIX: COVERUP

Plaintiff incorporates all subsequent sections and attachments herein by reference as though fully stated in this main document.

Date	Event Summary
Oct4	Plaintiff <b>Friday October 4, 2024, 00:02:10</b> complaint to the Attorney Grievance Commission triggered an immediate response in Robinson's schedule and the County Administrator Office was delegated for the week of Oct 7-11.
Oct5	<b>18:18</b> Plaintiff Files Notice of Hypothesis of Crayons.
Oct7	<b>Monday October 7, 2024, 06:12-06:14</b> Plaintiff Affidavit of Harm is reviewed, indicating someone outside the clerk's office is reviewing the filing. <b>12:06</b> Plaintiff Files the Affidavit of Financial Urgency with Exhibits showing damage to credit and financial resources. The first warnings of financial harm approaching began a month before. <b>12:50</b> Plaintiff of Notice of Hypothesis of Crayon's is reviewed. <b>13:01:35</b> The Office of Bar Counsel emails Ryan Dillon-Capps "Thank you for your email. Your correspondence was received and is being processed as a new complaint. Should we need any additional information from you, we will contact you in writing."
Oct8-11	Ensor fights to deny and prevent any other filings from being added to the record until Robinson returns. Plaintiff obtains a favorable from Judge Finifter on Oct 11 for a hearing on Due Process Violations – it is later blocked.
Oct11	Bernstein sent a letter echoing language later found in rulings issued by Judge Robinson, marking her alignment with judicial actors.
Oct15-16	Judge Robinson returned to his role as County Administrative Judge after meeting with Bernstein. This meeting preceded procedural shifts, including mirrored language and suppressive rulings.
Oct22-23	<b>Oct 22 19:07 to Oct 23 10:45</b> Plaintiff Files 41 filings to compel the Defendants to produce evidence and justify 4 months of litigation.
Oct23	<b>14:01</b> Plaintiff provided critical evidence to DeGonia II, including hearing transcripts and counterclaims. DeGonia II failed to act and aligned with judicial conspirators, allowing procedural outcomes to favor defendants.
Oct24	<b>08:53</b> Miles & Stockbridge, P.C. file a notice of withdrawal. Claiming there was no answer since June 14.

Oct28	Plaintiff submitted an "Amended Affidavit of Abusive Use of the Judicial System" to DeGonia, documenting retaliatory measures and procedural abuses. No action was taken by DeGonia.
Nov7	Request for Emergency Administrative Review was denied with mirrored language: "Insufficient legal or factual basis." Bernstein was implicated in ensuring these denials aligned with suppressive strategies.
Nov8	Plaintiff sent an email to Judge Robinson to induce a response. That same evening, lawsuit records were altered after business hours, suggesting coordination between Robinson and Bernstein.
Nov10	Bernstein received another email from Plaintiff outlining planned actions for November 11, triggering further coordinated judicial responses and procedural delays.
Nov12	Judge Robinson signed a retaliatory order following coordination with Bernstein.
Nov14	Robinson formally filed the retaliatory order alongside procedural deficiencies flagged by the Clerk's Office.
Ongoing	At first the Defendant assumed the constant irregularities in the record was a result of the induced dissociative amnesia, and as a result the court record was downloaded and dated repeatedly. Once the evidence revealed the record was being manipulated, a systematic process was developed and combined with digital forensic analysis. These Defendants use a combination of methods to fabricate legitimacy, and a reproducible process has been developed for the Special Master's investigation.

COUNTY ADMINISTRATIVE JUDGE	<b>DENNIS M. ROBINSON JR.</b>
SENIOR JUDGE	<b>H. PATRICK STRINGER</b>
ASSOCIATE JUDGE	<b>STACY A. MAYER</b>
CLERK OF THE CIRCUIT COURT	<b>JULIE ENSOR</b>
BAR COUNSEL	<b>THOMAS DEGONIA II</b>
DIRECTOR/INVESTIGATIVE COUNSEL	<b>TANYA C BERNSTEIN</b>

### COVERUP PHASE 1 – COORDINATED COVERUP

Filed/ Acpt	Rule/ Enter	Ruling	Judge	Filing
10/15 10/16	10/16 10/16	Motion to Expedite Hearing (issued from the admin judge's desk by Judge Finifter)	Denied Robinson	Request for Administrative Judge Hearing III Initially Marked Deficient by Clerk Endor  This filing is part of a series directed to the Administrative Judge's Office, submitted at a time when Judge Robinson is believed to be meeting with the Director of Investigations. It is during this time that a formal agreement to cover up certain matters is suspected to have been established.  The multiple filings requesting an administrative hearing reveal the intentional nature of Clerk Endor's actions to obstruct the process.
9/27 9/30	10/21 10/22	<b>Motion for Sanctions</b>	Denied Stringer	No Opinion Cited for Denial on my Counterclaim.
10/11 10/11	10/21 10/22	Motion Special Assignment	Denied Mayer	Ruling states "Read, considered, and respectfully denied at this time. The procedural history outlined in the Motion, and this Court's review of the court file, suggests that the Court has effectively and efficiently ruled on all pending matters within the normal course"

				Ohana's only denial --used to justify and implement the argument of procedural history
10/11 10/15	10/21 10/22	Motion for Expedited Discovery	Denied Mayer	Denied - to get things closed
10/8 10/8	10/28 10/29	Motion for Urgent Hearing	Moot Stinger	Originally Marked Deficient by Clerk Endor
6/14 6/14	11/2 11/6	Complaint: Notice for Voluntary Dismissal Filed on October 24, 2024	Granted Stringer	Complaint: Notice for Voluntary Dismissal Filed on October 24, 2024  Notice of Voluntary Dismissal of Employer's Case – Granted with Judges and Law Firm Clinging to the false claim of no answer.  Ruling Judges pretending the other 26+ Motions Pending which include counter claims and Motion for Directed Verdict

COVERUP PHASE 2 – ROBINSON AND STRINGER  
MOOT AND DENY “NO LEGAL OR FACTUAL BASIS”

Filed/ Acpt	Rule/ Enter	Filing	Judge	Notes
10/8 10/9	11/6 11/7	Motion to Compel	Denied Robinson	Denied Echo's "insufficient legal or factual basis for the relief requested"
10/15 10/16	11/6 11/6	Motion Disqualify Counsel	Moot Stringer	Moot Echo's "case closed; case closed"
10/15 10/16	11/6 11/6	Motion Injunction Compensation	Denied Stringer	<b>Purpose:</b> This filing seeks to restore lost income due to wrongful termination—a counterclaim submitted without sufficient explanation from the opposing party.  <b>Context Reminder – Medical Emergency:</b> The Plaintiff faces a life-threatening medical condition, with the risk of sudden death. This context underscores the urgency of restoring the Plaintiff's income and addressing the wrongful termination claim promptly.
10/15 10/16	11/6 11/6	Motion Strike Bad Faith Opposition	Denied Stringer	Denied
10/15 10/16	11/6 11/6	Motion Strike Opposition Motion to Add Counsel	Moot Stringer	Moot Echo's "case closed; case closed" <sup>1</sup>
10/15 10/16	11/6 11/6	Motion to Strike Opposition Motion to Compel	Moot Stringer	Moot Echo's "case closed; case closed"
10/17 10/18	11/7 11/7	Request Reconsideration to Enforce Admin Judge Ruling Oct 11, 2024, (Judge Finifter's Granting Hearing)	Denied Robinson	Echoed Responses – Matching Language
10/30 10/30	11/7 11/7	Request for Emergency Administrative Review	Denied Robinson	<b>Echoed Responses – Matching Language and Procedural Irregularities</b>  The hearing request was initially <b>Granted</b> , then <b>Denied</b> with a direction to expedite, subsequently <b>Ruled Moot</b> ,

<sup>1</sup> Despite denying a previous motion, and then moot on this motion. They realized Steven Frenkil was all over the filings and in the system. When retaliation on 11/8 occurred after hours, believed to be Judge Robinson, the record was updated, and Steven Frenkil was silently added when the case was also updated to closed.

				<p>and, upon reconsideration, the request to expedite was <b>Denied</b> a second time.</p> <p>Final response on <b>November 7, 2024</b>:  <b>“Denied – insufficient legal or factual basis for the relief requested. The Court also notes that a voluntary dismissal was filed recently, and that the case is closed.”</b></p> <p>These inconsistent rulings and procedural reversals, along with language echoing earlier denials, reflects the abuse of process.</p>
	11/13	Deficiency Notice	Endor	<p><b>Confirming Conspiracy Participation.</b> The County Administrative Judge and County Clerk both delay adverse conduct and ruling after the Director of Investigation is informed of a Pending Action.</p> <p>Resuming Activity after a brief hiatus to wait to see, and then retaliating when nothing happened.</p>
	11/14	Order – Barring Contacting County Administrative Judge Threatening Sanctions	Order Robinson	<p><b>11/14/2024 9:17 AM</b>  <b>Claims “filings” were submitted to the Judge. Complaints were emailed, Notices of Filings Filed</b></p> <p>Notably, the 11/8/2024 Email being the last one. Followed by Email to Director of Investigations on early hours of 11/10/2024 saying Plaintiff was escalating on Monday.</p> <p>No activity on Monday, this Order dated 11/12 but not filed until the 14<sup>th</sup>.</p> <p>After the Clerk Filed a Deficiency Notice for the same day’s filings.</p> <p>Then a day after the order, ruling resumes at a hasten pace.</p> <p>Demonstrating messages privately sent to the director who is supposed to investigate Judges, has instead conspired with them.</p>
10/22 10/23	11/15 11/15	<b>Motion for Early Discovery</b>	Moot Stringer	<p><b>11:14 AM</b>  <b>Denied as Moot. Case has been Dismissed.</b></p> <p>This appears to be a proposed order that was withdrawn and replaced by the 7 motions for directed verdict</p>
10/22 10/23	11/15 11/15	Motion In Limine	Moot Stringer	<p>11:28 AM          Denied as Moot. Case has been Dismissed.</p> <p>This appears to be a proposed order that was withdrawn and replaced by the 7 motions for directed verdict</p>
10/22 10/23	11/15 11/15	Motion to Vacate TRO/PI	Moot Stringer	<p>11:42 AM          “Moot. The TRO expired 10 days after the case has been dismissed by Plaintiff”</p> <p>The long list of other parts of the order including the PI? The former employer and law firm were threatening enforcement days before the notice.</p>
10/22 10/23	11/15 11/15	Motion to Disqualify M&S For Ethical Violations and Misconduct	Moot Stringer	<p>11:42 AM          Moot. Case has been Dismissed</p> <p>This is a part of the counterclaims – Injunctive and Declarative Relief</p>
10/22 10/23	11/15 11/15	Deposition Request for Agents of Ohana Growth Partners	Moot Stringer	<p>12:18 PM          Denied as Moot. Case has been Dismissed</p> <p>Counterclaim – Injunctive and Declarative Relief</p>
10/22 10/23	11/15 11/15	Motion to Compel Production	Moot Stringer	<p>12:20 PM          Denied as Moot. Case has been dismissed</p> <p>The motion was tied to sanctions – a counter claim</p>

10/22 10/23	11/15 11/15	Motion of Referral for Criminal and Ethical Investigations	Denied Stringer	12:24 PM No reason given 46 different counts on crimes alone
10/22 10/23	11/15 11/15	Motion to Dismiss with Prejudice (for a June 13 <sup>th</sup> worth of reasons)	Moot Stringer	12:31 PM Moot. Case has been dismissed =without prejudice= on notice without agreement after counterclaims were filed
10/18 10/18	11/15 11/15	Employer's Request for Scheduling Conference	Moot Mayer	Ruled on 10/25/2024 2:58:39 PM Entered on 11/15/2024 4:28:00 PM

### CONSPIRACY REQUEST FOR SPECIAL MASTER

The Plaintiff requests that the Special Master approach this investigation with a guiding question: *"What has not been compromised?"*

The Plaintiff does not assert that this represents the full scope of collusion or conspiracy.

The data does not suggest that this is a newly formed group of conspirators; rather, it indicates what happens when systemic corruption is threatened with exposure. Through strategic misdirection and a recognition of predictable patterns of criminal conduct, the Plaintiff has created an opportunity for the State of Maryland and the U.S. Government to address systemic corruption at its root. This previous lawsuit, along with efforts to document and verify those involved in the conspiracy, has come at significant risk and cost to the Plaintiff.

The unknown scale of corruption presents a heightened risk, compounded by the harm the Plaintiff has endured to obtain this information. After over five months of litigation against a fraudulent lawsuit and ongoing counterintelligence efforts to expose systemic corruption, the Plaintiff now faces financial hardship and severe physical harm, rising to the level of a medical emergency.

### RESPECTFULLY SUBMITTED

**December 23, 2024**

/s/ Ryan Dillon-Capps  
**Ryan Dillon-Capps**

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