## UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND NORTHERN DIVISION

Cause No.:

Respondents.



**DEMAND FOR JURY TRIAL** 

RONALD E. DIXON JR., In the related removals from the Circuit 18751 Harmony Woods Lane Court of Frederick County, Maryland: Germantown, MD 20874 [Montgomery Co.] State case number: C-10-CR-18-000024 Petitioner, ("State of Maryland v. Ronald Eugene Dixon") V. AND STATE OF MARYLAND, State case number: 10-C-13-003130 FREDERICK COUNTY DEPARTMENT ("Frederick County Department of OF SOCIAL SERVICES, Social Services v. Ronald Dixon") 1888 North Market Street, P.O. Box 3066 Frederick, MD 21705-3066, and Judge Julie R. Stevenson Solt, presiding BETH M. DIXON, 503 Mount Vernon Place #3 **CONSTITUTIONAL QUESTIONS** Rockville, MD 20850 [Montgomery Co.],

## Affidavit of Ronald E. Dixon Jr. on Widespread Corruption

Now hereby I the affiant, Ronald E. Dixon Jr., do declare under penalty of perjury that the following facts are true and correct to the best of my information and belief:

**FACT:** I am an undersigned Petitioner in this action, a victim of the crimes herein and below enumerated, and also therefore with personal direct knowledge upon the same matters.

FACT: The State of Maryland, the Maryland state bar association and particularly all "family law" related training and disciplinary units, agencies, committees, chairpersons, directors thereof, along with all county bar associations and their officers, all quasi-governmental-professional entities related to the Maryland state family law system, and necessarily all such

Maryland state domestic relations judges along with all such family law attorneys who practice before the same judges daily in routine, have all always known, each and every one of them, both expressly and implicitly, that no state court, nor any other part and/or officer and/or other actor of the state apparatus, may ever remove, take away, suspend, interfere with, diminish or otherwise impact, change and/or otherwise impinge, alter, or even so much as harass, in any way or amount, the protected superior legal status and all associated fundamental constitutional rights of every pair of fit natural parents to their equally enjoyed and equally vested rights regarding their own care, custody, control and management of their any natural minor children, without first the state and its officially-designated officers proving, and that only achievable lawfully if proven by clear and convincing evidence admitted under fully valid due process protection procedures, that either such natural parent is actually guilty of some very serious form and/or effect of child abuse, neglect, and/or abandonment.

FACT: Each and every one of the above same entities and legal professionals has long known and well knows that for decades within Maryland there have been clear and plainly established statutory causes of action with related procedures for termination of parental rights ("TPR") cases regarding alleged serious acts of abuse, neglect and/or abandonment by parents of their natural children, i.e., under the state's *parens patriae* jurisdictional authority presumed upon good cause shown for resolving such situations to the safety and well-being interests of such personally-affected minor children.

FACT: Each and every above same "family law" court officer, i.e., all such Maryland state judicial officers described herein, as well as all such state-licensed "family law" attorneys described herein, are each and all fully well aware that they have absolutely no lawful business or any other bona fide interest of any kind, whatsoever, attempting to in any way either impact or

otherwise disturb the pre-existing and superior constitutional rights and interests of any natural parent to the care, custody, control and management of his/her any natural minor children - no valid business or any lawful interest whatsoever - except and solely limited to and via the above same well established actions at law with related procedures for such "TPR" cases.

FACT: Each and every above same "family law" court officer, i.e., each such Maryland state judicial officer described herein, as well as each such state-licensed "family law" attorney described herein, further well knows, and not a single one of them may even attempt to deny, that they each and all understand fully that the clear and convincing evidentiary standard is required at minimum within the context of any action at law supposing to impact the custody of any minor, and accordingly they each and all understand fully that the mere preponderance evidentiary standard being used by and within their same Maryland "family law" courts is most certainly not constitutionally sufficient for any proposed impact to any natural parent's child custody rights, i.e., they well know that every such case processed under the wrong evidentiary standard is constitutionally void and of no true legal effect whatsoever, yet they all nevertheless still continue every day to criminally conspire with creating yet more of exactly the same fatally insufficient and constitutionally void cases, along with further knowingly fictitious and fraudulent creations of multiple if not numerous false state records per and within each and every such individually different said domestic relations case (their willfully ongoing false creations of knowingly fraudulent and knowingly unconstitutional court orders, i.e., multiple knowingly criminal creations of fraudulent state records within each and every such "family law" case), and we're talking about thousands upon thousands of new, additional fraudulent state records created knowingly falsely every business week, i.e., also fraudulently and endlessly costing yet millions upon even more millions of frivolously wasted taxpayer dollars.

FACT: Each and every above same "family law" court officer, i.e., all such Maryland state judicial officers described herein, as well as all such state-licensed "family law" attorneys described herein, further well knows, and not a single one of them may even attempt to deny, that both natural parents are absolutely equal in the eyes of the law, that both are constitutionally presumed to be and must be treated as fit and equal parents in all respects at all times unless one or both were first proven seriously unfit under full due process as above described, and therefore necessarily also that within any question of the care, custody, control and management of minor children between every such fit pair of natural parents coming before any such state court for any reason that the only constitutionally-compliant act by such state court in regards to such children is simply to recognize, uphold and enforce those equally-shared rights and interests of both natural parents equally in all respects, specifically requiring that both such legally-fit and legally-equal natural parents shall equally share their child/ren in all physical time possession rights, all decision-making rights, and just as equally within all other legal responsibilities, rights, and interests, i.e., absolutely equal and fully-shared retention of all said same pre-existing and superior-to-the-state parental rights to their same child/ren.

FACT: Each and every above same "family law" court officer, i.e., each such Maryland state judicial officer described herein, as well as each such state-licensed "family law" attorney described herein, further well knows, and not a single one of them may even attempt to deny, that the Maryland state "family law" industry of all such judges and attorneys described herein are absolutely guilty en masse of knowingly defrauding away the fundamental constitutional rights and interests of approximately one-half of all such natural parents entering their state "family law" courts within the above-described manners, i.e., absolutely guilty, in each and every such different individual state "family court" case, of criminally conspiring in that creation

of yet another wholly false, utterly fictitious and fraudulent state court "order" manifestly pretending to "grant" or "award" custody of any child or children to only one of the both same such fit and equal natural parents, as neither the state nor any such court or state judicial officer has themselves any such actual legal custody of said children to even give away ("award" or "grant") to anyone else, in the first place, let alone that both such natural fit parents already and both have full, equal and complete custodial rights of their child/ren.

FACT: Each and every above same "family law" court officer, i.e., each such Maryland state judicial officer described herein, as well as each such state-licensed "family law" attorney described herein, further well knows, and not a single one of them may even attempt to deny, that within some 97-98% of all such Maryland domestic relations cases there have not even been any allegations of any actual serious child abuse, neglect or abandonment by or against either of the two given natural parents involved, hence in all such cases there has never been even the first iota of any constitutional jurisdiction or basis to even begin to question the permanent retention by either and/or both such natural parents of their respective child custodial rights shared fully equally between them, and hence each and every such judge and attorney further knows fully and all too well, and not a single one of them may attempt to deny, that they knowingly are criminally conspiring to completely defraud all the rights and interests - and monies - of \*both\* same parents \*and\* their child/ren involved, by each time arbitrarily and capriciously and utterly falsely "awarding" or "granting" somehow magical and sudden "primary" (disparately superior) child custody rights and interests of and by one of the given parents over and above the other equally-fit and equally-entitled natural parent.

FACT: Each and every above same "family law" court officer, i.e., each such Maryland state judicial officer described herein, as well as each such state-licensed "family law" attorney

described herein, further well knows, and not a single one of them may even attempt to deny, that they know that actually adhering to their own ethical duties for constitutional compliance with upholding equal rights and equal justice in equal fashion to both equally fit natural parents in those 97-98% of all such cases wherein no serious parental unfitness exists would mean also that in the same 97-98% of cases there would be nothing at all to do with respect to any child custody rights, since the only possible lawful and constitutionally-required result in and for each and all such cases is automatic implementation of fully true and equally-shared ("50/50") child custody without any falsely-created ongoing transfers of wealth disguised in the form of sopayments by their falsely-targeted-and-victimized, so-called called "child support" "noncustodial" parent, and hence that without anything to do anymore in 97-98% of all such cases, so would go away likewise some 97-98% of their falsely and fraudulently created billable hours, i.e., that very same 97-98% of their collectively conspired unjust enrichment schemes being criminally foisted upon all of the good parents, children, people and citizens of not just all across Maryland, but obviously all across the rest of the nation as well.

FACT: Each and every above same "family law" court officer, i.e., each such Maryland state judicial officer described herein, as well as each such state-licensed "family law" attorney described herein, further well knows, and not a single one of them may even attempt to deny, that said judges knowingly and willfully and routinely allow the same said attorneys to "drum up" their business and thereby-falsified billable hours by unconstitutionally engaging in any and all endless manners of frivolously irrelevant issues with respect to "arguing" about "which" parent should be "awarded" or "granted" custody of their child/ren in the context of non-existent parental unfitness (let alone wholly frivolously under the mere and fatally insufficient preponderance evidentiary standard), i.e., each and every such judge and attorney in the State of

Maryland is criminally guilty beyond any shadow of doubt in regards to all of these ongoing acts of felony barratry routinely committed by all such "family law" attorneys on a daily basis, and culpable within those daily conspiracies to commit the same racketeering enterprise crimes upon the entire general public *en masse*, thereby also perpetrating daily fraud upon the United States of America via willfully falsified claims for Title IV-D reimbursement, i.e., criminal conspiracy to defraud the United States daily, as an actual *de facto* established policy, practice and pattern.

FACT: Each and every above same "family law" court officer, i.e., each such Maryland state judicial officer described herein, as well as each such state-licensed "family law" attorney described herein, further well knows, and not a single one of them may even attempt to deny, that no judge may ever preside over any case in which the judge has the slightest any pecuniary interest, which is exactly what they instead criminally conspire in and perpetrate daily, in very large measure indeed, as the direct and knowing daily corruption of fundamental due process occurring within each and every single action to either create and/or enforce any Title IV-D child support lien falsely and fraudulently created within and by the very same given County, as they all also already know that the same judges (as well as that County's clerk and prosecutor, and the County itself) each get their own "cut of the pie" of all such Title IV-D monies collected routinely from their crime victims, i.e., collected from the very same so-called and falselycreated "noncustodial" parents whom they relentlessly perpetrate egregiously false and malicious prosecutions against to criminally line their own dishonest pockets deeper and deeper with, and within the same additional racketeering enterprise crimes inflicted upon the entire general public en masse, each and every same such judge and attorney well further knows that they are likewise simultaneously defrauding the Title IV-D federal reimbursement program by each and every corresponding false claim therefore submitted to the federal government for such falsified reimbursement purpose, i.e., each and every such judge and attorney well knows they are all knowingly defrauding the United States and all federal taxpayers on a routine and daily basis.

FACT: Not only are the raw and sheer number of above described knowing acts of various state and federal felonies perpetrated by each and every same judge and attorney statewide easily well into the thousands of individually chargeable crimes per any given business week, all such judges and attorneys are clearly also "bottomless pit" deep into refusing to obey many if not most of the various provisions of their mandatory ethics rules in general, not to mention also uniformly refusing to obey the particular mandatory ethics rule to withdraw from any case prior to and instead of aiding or abetting or even perpetrating any crime whatsoever, not to also mention their same equally criminal conspiracy in *de facto* pattern, practice and/or policy to likewise uniformly conceal and cover up all such manifest crimes and overwhelmingly egregious professional misconduct against their own ethics rules by refusing to report such manifest misconduct by other legal professionals to the various proper authorities including both, to professional disciplinary authorities, and also to state and/or federal law enforcement authorities.

FACT: Within \*\*each and every\*\* such clearly false and fraudulent, constitutionally-repugnant Maryland "family law" case altering pre-existing child custody rights and/or interests of any natural parent without even the existence of any such actual serious parental unfitness even alleged, let alone actually first proven under the required full due process aspects, each and every same such Maryland judge and attorney complicit therein is obviously also therefore necessarily and 100% conclusively guilty under criminal law for no less than \*\*at least\*\* one (1) Count of knowingly, willfully, and intentionally violating each and every single one of the following penal proscriptions, and typically guilty of multiple Counts of most of the following same, and further typically guilty of other assorted crimes in each individual case, i.e., literally

guilty of an entire proverbial "pirate's bounty" of numerous state and federal felony and misdemeanor charges:

- 1) Always in every case at least one felony Count under 18 U.S. Code § 3 ACCESSORY

  AFTER THE FACT (1/2 of the other sentence for each act);
- 2) Always in every case at least one felony Count under 18 U.S. Code § 4 MISPRISION OF FELONY (3 years for each act);
- 3) Always in every case at least one felony Count under 18 U.S. Code § 241 CONSPIRACY AGAINST RIGHTS (10 years for all basics for each act);
- 4) Always in every case at least one felony Count under 18 U.S. Code § 242 DEPRIVATION OF RIGHTS UNDER COLOR OF LAW (1 year for all basics for each act);
- 5) Always in every case at least one felony Count under 18 U.S. Code § 371 CONSPIRACY TO COMMIT OFFENSE OR TO DEFRAUD UNITED STATES (5 years for each act);
- 6) Always in every case at least one felony Count under 18 U.S. Code § 880 RECEIVING THE PROCEEDS OF EXTORTION (3 years for each act);
- 7) Always in every case at least one felony Count under 18 U.S. Code § 1001 STATEMENTS OR ENTRIES GENERALLY (5 years for each act);
- 8) Always in every case at least one felony Count under 18 U.S. Code § 1002 POSSESSION OF FALSE PAPERS TO DEFRAUD UNITED STATES (5 years for each act);

- 9) Always in every case at least one felony Count under 18 U.S. Code § 1341 FRAUDS AND SWINDLES (20 years for each act of "mail fraud") (Note: See 18 U.S. Code § 1346 for the definition of "scheme or artifice to defraud" which clarifies, "For the purposes of this chapter, the term "scheme or artifice to defraud" includes a scheme or artifice to deprive another of the intangible right of honest services.") (emphasis added);
- 10) Always in every case at least one felony Count under 18 U.S. Code § 1343 FRAUD BY WIRE, RADIO, OR TELEVISION (20 years for each act of "wire fraud") (Note: See 18 U.S. Code § 1346 for the definition of "scheme or artifice to defraud" which clarifies, "For the purposes of this chapter, the term "scheme or artifice to defraud" includes a scheme or artifice to deprive another of the intangible right of honest services.") (emphasis added); and,
- 11) Always in every case at least one felony Count under 18 U.S. Code § 1964 CIVIL REMEDIES (RICO jurisdiction of same matters) (against all co-conspirators);

Think some of these might not apply? Think again: Every single element of each above state and federal felony and misdemeanor offense by the same state judges and attorney officer-conspirators is \*already\* proven conclusively in black-and-white... indeed, by their own hands.

And again in reminder, there are also an entire "pirate's bounty" of state felony and state misdemeanor charges directly applicable under the Maryland Penal Code upon them, as well.

Pursuant to various sections under Title 18 of the United States Code, all such same state judges and attorneys, as joint tortfeasors in conspiracy, are all already guilty and liable for affirmative acts towards and/or also neglects to prevent aiding, abetting, and/or attempting to

conceal the various felony and misdemeanor crimes perpetrated by any other officer of any of the same courts against various, multiple sections of the Maryland Penal Code (state crimes herein) and also of such various above crimes against Title 18 of the United States Code (federal crimes herein), because within a criminal conspiracy the law is well-established that any contributing act performed by any individual of the conspiracy is chargeable unto the other individuals within the same conspiracy, regardless whether they even knew of the given separate act, as well as also clarifying that each such judge and attorney is also guilty and liable in regards to all of their own affirmative individual and/or joint criminal acts and/or omissions perpetrated as such crimes and related matters, to say nothing of serious causes of action like abuse of office, abuse of power, official misconduct, false and malicious prosecution, gross negligence, tortious interference with rights, violations of civil rights, intentional inflictions of emotional distresses, breaches of duties to prevent harm, breaches of fiduciary duties, and so forth.... and of which any two (2) or more particular types of triggering predicate acts (and there are many such predicate acts involved herein) shall and do also invoke RICO/Racketeering charges as mentioned above.

Naturally also, each and every judge ever having so acted fraudulently with each such state court case should and must now by law be removed from office pursuant to any of the alternative provisions mandated under the Maryland Constitution, all of the instant state court clerks could also by law be similarly removed from office pursuant to similar provisions of Illinois law, while obviously also all of the willfully dishonest and criminally-acting attorneys *therein*, and including each individual attorney *herein*, should and must be law be disbarred permanently and forever from the practice of law, and with the standard reciprocal notices sent unto the state bar associations of all other 49 sister States and Commonwealths as well as the District of Columbia.

FACT: I the undersigned Affiant am a direct victim of all of the same above detailed racketeering and other crimes against the well-established law and rights as perpetrated within and regarding my own state case history by the individual state court officers themselves engaged therein — indeed, even much worse than the standard criminality — and therefore I am entitled to have corresponding criminal prosecutions initiated forthwith against them each and all, and further to be reasonably compensated for all of the many egregious injuries falsely inflicted upon my parent-child relationship rights, my other constitutional rights, my person, my name and reputation, my property, my monies, my credit rating, and so forth, including for all consequential damages, losses of use, loss of economic advantage and/or opportunity, and so forth, and further that all such damages are trebled due to such manifest fraud, plus punitive and/or other special damages awarded, along with being actually made constitutionally whole again by this Court in respect to my fundamental and natural rights, i.e., to compel the full and immediate return of all such false "child support" thefts of my wealth, income and monies, plus the same with interest as by law provided, and likewise compel all reasonably available physical restoration of all of my physical parenting time that I was always constitutionally entitled unto from the very moment in original inception, i.e., to immediately compel the corresponding total such same "make-up" amount of all of my falsely stolen physical parenting time in accelerated fashion to, as much as is reasonably possible, restore all or at least most of that fully-equal total of all such parenting time I have been falsely deprived of, starting immediately now and continuing in either majority or exclusive possession as reasonably necessary without pause until all such missing parenting time is fully restored in entirety, or until the date there is no longer a minor child herein due to reaching adulthood, whichever occurs first, as none of the above in regards to remedial parenting time award is asking a federal court to engage in any "reasonably forbidden" endless evidentiary processes as are properly reserved for the resources of a state court, but simply a simple time calculation in simple declaration of mathematical result award.

Affiant sayeth further naught.

Respectfully submitted,

Ronald E. Dixon Jr.

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Pro Se Petitioner Party of Record

## **VERIFICATION**

I hereby declare, verify, certify and state, pursuant to the penalties of perjury under the laws of the United States, and by the provisions of 28 USC § 1746, that all of the above and foregoing representations are true and correct to the best of my knowledge, information, and belief.

Duly executed at Germantown, Maryland, upon this \_\_\_\_\_ day of March, 2018.

Ronald E. Dixon Jr