

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION

RDB 18CV0885

U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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Cause No.:

RONALD E. DIXON JR.,
18751 Harmony Woods Lane
Germantown, MD 20874 [Montgomery Co.])

Petitioner,)

v.)

STATE OF MARYLAND,)
FREDERICK COUNTY DEPARTMENT)
OF SOCIAL SERVICES,)
1888 North Market Street, P.O. Box 3066)
Frederick, MD 21705-3066, and)

BETH M. DIXON,)
503 Mount Vernon Place #3)
Rockville, MD 20850 [Montgomery Co.],)

Respondents.)

In the related removals from the Circuit
Court of Frederick County, Maryland:

State case number: C-10-CR-18-000024
("State of Maryland v. Ronald Eugene
Dixon")

AND

State case number: 10-C-13-003130
("Frederick County Department of
Social Services v. Ronald Dixon")

Judge Julie R. Stevenson Solt, presiding

CONSTITUTIONAL QUESTIONS

DEMAND FOR JURY TRIAL

Notice of Petition; and, Verified Petition for Warrant of Removal

Comes now the Petitioner, Ronald E. Dixon Jr., and in support of this action for removal of the above-encaptioned state court cause into the jurisdiction of this United States District Court, and on the various federal questions involved, herein alleges, states and provides the following:

JURISDICTION AND VENUE

1. This Court now has proper jurisdiction over this cause of action pursuant to, but not limited to, the following statutory authorities: 28 USC §§ 1443 and 1446(b) [constitutional challenge to state statutes under special Section 1443 civil rights removal], as well as 28 USC §§ 1331, 1343 and 1367 [standard federal questions, and federal supplemental jurisdiction over

intertwined state law claims], also further pursuant to the Federal Consumer Credit Protection Act, 15 USC §§ 1601, et seq., and yet again even further independent jurisdiction via the False Claims Act, 31 USC § 3729, et seq. Moreover, this Court is an Article III court with the express authority to hear and adjudicate any questions arising under the Constitution, Laws, and Treaties of the United States, including but not limited to the Bill of Rights and the Eleventh Amendment, the original Thirteenth Amendment, and Fourteenth Amendment to the U.S. Constitution, the International Covenant on Civil and Political Rights, and the Universal Declaration of Human Rights, with Reservations. *See also* the Article VI Supremacy Clause of the Constitution of the United States of America, as lawfully amended (*hereinafter* “Federal Constitution”).

2. Venue is quite and solely proper, as removal over numerous state violations of various federal rights, both as perpetrated and as threatened to perpetrate, within Frederick County, Maryland, venue is also quite and solely proper as for violations of the Federal Consumer Credit Protection Act, both as perpetrated and as threatened to perpetrate, within Frederick County, Maryland, and venue is also quite and solely proper as for violations of the False Claims Act in defrauding the United States, again both as perpetrated and as threatened to perpetrate, within Frederick County, Maryland.

PARTIES

3. Your Petitioner, Ronald E. Dixon Jr., is a resident and citizen of the State of Maryland, also a victim of all described and enumerated federal and state crimes herein perpetrated by the individual Respondents Frederick County Department Of Social Services and Beth M. Dixon in plain and willful conspiracy with various judicial, attorney, clerk and other actors of Respondent State of Maryland to intentionally violate and deprive fundamental rights, natural rights, rights of

equality, and etc., i.e., their willful, knowing and intentional conspiracies to perpetrate multiple violations of civil rights, multiple violations of the Federal and Maryland Constitutions, and etc.

4. Respondent State of Maryland is the sole and proper party, by and through its duly elected Attorney General, to engage this matter in discussion and any defense of its own state statutes being facially challenged herein. *See* the formal Notice of Constitutional Questions to Maryland State Statutory Schemes filed contemporaneously herein. **NO** other party, whether actual party listed within this Parties section, nor any other interested and/or third party, intervenor, amicus, next friend, nor any other sort, may lawfully attempt to either circumvent, act as impostor for, or otherwise speak in the stead of the exclusive role and authority herein by the Attorney General of the State of Maryland upon all matters clearly affecting the public interest as a whole and also statewide, and any and all such attempts should and must be vigorously sanctioned in full extent.

5. Respondent Frederick County Department Of Social Services (hereafter either “FCDSS” or “the Department”) is a county branch of the Department of Social Services subdivision of Respondent State of Maryland, as a civil and criminal respondent party within the removed state case as defrauding myself, my minor child, and also criminally defrauding the United States (willful false claims), and it may attempt under opportunity herein to defend wanton, willful, knowing and intentional acts, behaviors, and conspiracy to perpetrate criminal and civil violations of the undersigned Petitioner’s well known and well established fundamental, natural, equal and other federal rights.

6. Respondent Beth M. Dixon is a resident and citizen of the State of Maryland, she is the other natural but adverse parent of this undersigned Petitioner’s natural minor child, and she may attempt under opportunity herein to defend her wanton, willful, knowing and intentional acts,

behaviors, and conspiracy to perpetrate criminal and civil violations of the undersigned Petitioner's well known and well established fundamental, natural, equal and other federal rights.

INTRODUCTION

7. Your Petitioner complains of various willful, systemic deprivations of fundamental rights guaranteed by the Federal Constitution, and/or by federal law, and which deprivations are civil violations of 42 USC § 1983, and that are also criminal violations of 18 U.S.C. §§ 241 and 242.

8. Within the proceedings of the state court in question, Petitioner has duly advised the state judge, all other named parties, and various third parties, that certain actions and judicial events either are now existing, and/or all have been done, in clear, unambiguous violations of basic due process, state law, state procedure, the Federal Constitution, federal statutory law, and/or against the relevant rulings held by the several federal Circuit Courts of Appeals and the Supreme Court.

9. Your Petitioner does not, in any way, request and/or seek this honorable federal Court to *alter, amend, or change*, whatsoever, any aspect(s) of divorce, child custody, or any other type of familial and/or domestic matters that are properly reserved for within the state court system, yet however all the torts and civil wrongdoing are fully actionable herein, *see* the contemporaneous Memorandum of Law Clarifying Established Federal Jurisdiction, which your Petitioner now and hereby also incorporates fully by reference the same as if it had been set forth fully herein. (H.I).

10. This petition for warrant of removal inures to the very essence of the enactment and clearly expressed purposes of 28 USC § 1443 by Congress, i.e.: to provide a statutory remedy for relief via removal to a United States District Court when a state court litigant "*is denied or cannot enforce in the courts of such State a right under any law providing for the equal rights of citizens of the United States, or of all persons within the jurisdiction thereof*" for the precise, expressly-mandated, clear and unambiguous letter, spirit and intent of said statute – which is, in

fact, direct statutory authorization for the federal court to intervene into the state court matter, for the Congressionally-enacted assurance of adequate forums to bring constitutional challenges in.

TIMELINESS OF REMOVAL

11. The relevant portion of 28 USC § 1446(b) providing for this removal is restated here:

“If the case stated by the initial pleading is not removable, a notice of removal may be filed within thirty days after receipt by the defendant, through service or otherwise, of a copy of an amended pleading, motion, order or other paper from which it may first be ascertained that the case is one which is or has become removable.”

12. Within the instant Frederick County proceedings, said Respondents collectively conspired to unconstitutionally remove my pre-existing and equally shared parental rights to my child, all without ever once first proving me seriously unfit under clear and convincing evidence, so as to initiate and grow false and fraudulently-obtained liens against me in the disguise of so-called “child support” debt, and this manifest injustice has continued for several years now. **Exhibit A.**

13. However, there is no state court of Maryland or anywhere else that has any proper and constitutionally valid form of jurisdiction over my natural parent-child relationship, and there never has been – again, because the State of Maryland has never lawfully removed my custody.

14. Within the instant Frederick County proceedings, Respondents and their related state actors, also previously knowing that the Federal Consumer Credit Protection Act (“CCPA”) was violated by ordering amounts of child support against me in excess of federal statutory maximum limits, and being fully aware of same, yet still illegally enforced said fraudulent liens in direct violations of the CCPA, which expressly prohibits all same as **void** state actions, see 15 USC § 1673(c), by illegal enforcements of “contempt” and similar criminally-false threats against me, and they have also used those same illegal actions in criminal intimidation to extort my monies, and have further violated my constitutional rights to travel by such related unlawful enforcement actions against my Maryland driver’s license, again in direct violations of 15 USC § 1673(c).

15. By knowingly defrauding and depriving me out of my fundamental natural child custody rights without ever once even attempting to follow constitutionally required pre-deprivation due process, the Respondents also therefore knew and know that any and all claims made under the federal Title IV-D reimbursement funding schemes were in fact knowing false claims and still are in fact false claims in violation of the federal False Claims Act, and by knowingly and separately exceeding the maximum limits of the federal CCPA in creating the same fraudulent “child support” liens against me, the Respondents have further perpetrated knowing acts of willfully making false claims for federal Title IV-D reimbursement in direct violations of the very same federal False Claims Act.

16. On March 5, 2018, your Petitioner was served for state court hearing again threatening my person and various rights yet again including newest threat of false jailing, i.e., yet again and more expressly unlawful and unconstitutional, strictly prohibited enforcement actions against non-existent debt falsely created under the same fraudulent “child support” lien. *See Exhibit B.* However, and repeated once again for well and good measure, there is no state court of Maryland or anywhere else that has obtained any actually proper and constitutionally valid jurisdiction over my natural parent-child relationships, hence there has never been any valid authority by any court to order me to pay “child support” – let alone to any child that I am *not even allowed* to have a relationship with – hence any “child support” lien falsely registered against me is *exactly that*, a fraudulent lien existing in direct violation of law – and a state felony criminal charge for every perpetrator involved in the same.

17. My own personal receipt of that related paperwork clearly triggered removal right under 28 USC § 1446(b), as “after receipt” [through any method] of [any formatted documentary information] so that an ascertainment of the ability to remove then suddenly became known, and

so then I removed as promptly as possible under the circumstances via filing this entire package without assistance of licensed professional counsel. *See*, my Notice of Special Pro Se Rights.

18. Therefore, your Petitioner is well within the required time, and further fears the state court transpiring against numerous laws and rights during the immediately upcoming thirty (30) days, as before, all as is further detailed and documented via the individual Counts as are initially presented herein, along with any included Exhibits where needed, so that the present number of grounds for removal therefore is already a serious number indeed, but yet the same will be even further augmented by pending amendment pursuant to F.R.Cv.P., Rule 15, all as also provided for, and reserved by, the undersigned Petitioner's Notice of Pending Amendment, et seq. (H.I.).

19. Accordingly, this instant petition for removal is well within the timeliness required under 28 USC § 1446(b) presently, and it would also *be again* timely filed herein (if and as needed), that is to say, that the United States Supreme Court has already discussed and approved in unison with the U.S. Solicitor General and other prominent attorneys that removal must be allowed into the designated federal trial court (this Court) until the federal court finally holds the merit phase, because under special Section 1443, federal jurisdiction cannot be determined until fact-finding determines whether or not the challenged state statutes are in fact routinely violating civil rights, and if that be the case, then the federal court does have Section 1443 jurisdiction, or if that not be the case, then the federal court does not have Section 1443 jurisdiction, hence proceeding fully into the merits phase, with discovery, etc., is actually required for Section 1443 removal cases.

REGARDING INCLUSION OF ORIGINAL PLEADINGS, THE COMPLETE RECORD
OF STATE PROCEEDINGS, AND, THE REQUESTED PRELIMINARY PROCEDURES

20. This is a removal under 28 USC § 1443, *quite different* from all other types of removal available under Chapter 89 of Title 28, and since it is *not* about any question of "most proper

original jurisdiction” within the context of comity and federalism, whatsoever, *there is no basis, need, or cause for inclusion of original state court pleadings* within the filing package for this removal to the United States District Court, *nor any need for inclusion of the entire state court record*. Further, these issues are addressed by pertinent motion for relief. Please *see* Petitioner’s Notice Distinguishing Between the Two Basic Types of Removal; and, Motion for Issuance of Preliminary Relief in the Alternatives. See *id.* at 7-9 regarding requested preliminary relief(s).

INCORPORATION OF PRIOR PLEADINGS IN STATE COURT

21. Regardless, Petitioner incorporates fully by reference all pleadings, papers, and effects heretofore filed or otherwise lodged in the state proceedings the same as if set forth herein (H.I), and the same also exist in direct support of establishing the basics herein, such as proper legal standing to invoke and prosecute the federal constitutional challenges to said state statutes, and further as a victim of numerous crimes perpetrated by the Respondents and related state actors.

PROHIBITED REMOVALS OF STATE COURT CASES

22. Petitioner notes and emphasizes for the Court’s and parties’ convenience, *and in being duly advised of Rule 11 ethics before making any response*, that 28 USC § 1443 provides for the removal of *any* type of state court case for violation(s) of equal civil rights, with the sole exceptions being *only* the following four (4) types of circumstances, pursuant to 28 USC § 1445:

- a) a civil action against a railroad or its receivers or trustees that arises under certain laws;
- b) a civil action against a carrier or its receivers or trustees that arises under certain laws;
- c) a civil action arising under the workmen’s compensation laws; and,
- d) a civil action arising under section 40302 of the Violence Against Women Act of 1994.

23. Accordingly, since none of the matters herein has anything even remotely to do with any of the four exceptions, the instant three (3) constitutional challenges to state statutes raised are each (and independently) perfectly proper causes for removal upon their own individual merits.

OVERVIEW OF STATE ACTOR + THIRD PARTY VIOLATIONS OF FEDERAL RIGHTS

24. Within the instant and related state court proceedings of Frederick County never-ending, your Petitioner has been, and is still being, affirmatively denied basic constitutional and due process rights to at least: (A) equal protection of the laws; (B) freedom from gender and class discrimination; (C) fair and competent tribunals; (D) reasonable notice and opportunity to be heard; (E) fair and lawful use in civil prosecution and defense of relevant and material evidence and of applicable statutory, rule, and case law authorities; also (F) liberty and property protections; and (G) various other violations of constitutionally-protected rights and interests.

25. In short, the state family court system may already be, or has become, a fully wanton criminal enterprise with the officers and professionals in daily power thereof absolutely and manifestly abusing process, law, litigants, and even incidental parties, in egregious patterns and practices of rights violations, also using unlawful threats and other false intimidation tactics, including willfully false deprivations of liberty rights to illegally coerce, rampant and flagrant obstructions of justice, extortionate schemes for unjust enrichment of their floozy and equally fraudulent leeches, outlandish and flagrantly obvious bias and prejudice, gross class and gender discriminations, engaging in repetitively-unlawful *ex parte* actions to obtain fraudulent orders *against* the law, and etc., i.e., generally so much crime, committed so often, it shocks conscience.

26. Again, to fully clarify the nature of this proceeding, your Petitioner does *not* seek this Court to “issue or modify any decrees” regarding state law matters of divorce, child custody, or

support, *nor anything involving fact or evidence details*, but instead *only* to enforce due process, equal and civil rights, true constitutional rights, and other federal rights, statutory and otherwise.

27. Your Petitioner has been outrageously harassed by the same local county courts and the related court administration systems, also repeatedly violating my most basic due process rights, by willfully, knowingly and intentionally conspiring in various commissions of criminal acts and behaviors, all shockingly done in an intentional conspiracy to aid and abet grand scale larceny.

28. Indeed, upon belief and information, this Petitioner has quite sufficient cause and grounds to also consider the demanding of various official investigations into patterns and practices of widespread, systemic violations of basic federal rights by these same local county court systems.

BACKGROUND FACTS AND ALLEGATIONS OF GENERAL LAW

29. The clear right to one's own direct flesh and blood is the second oldest fully-recognized right in all of human existence, save only the individual self-preservation right to life itself.

30. The variously enumerated basic rights under the Federal Constitution, e.g., the First Amendment right to free speech, the Second Amendment right to arm and defend yourself and your own family, and so forth, are generally all "self-evident" rights, that is to say various rights of We The People, the general citizenry, that are each of such innate and fundamental character and magnitude, that they are constitutionally then formally protected as recognized parameters necessary for the basic structure of our civilized society as a Republic with rule of equal and just laws, and not of laws subject to the fleeting whims of fickle mankind in perpetrating preference, prejudice and bias for and/or against any particular parties for any reason, nor subject to laws fatal on their faces for being contrary in any way to the basic maxims constitutionally established and enshrined - of the People, by the People, and for the People.

31. Most people would presume, in today's modern civilized equal rights society, that food, clothing and shelter are considered rights *per se*. Indeed, consider the vast number of many governmental programs now in existence at all levels for such basic items and issues. Yet, go back just a few hundred years, and such "necessities" as want for food, clothing and shelter were certainly not yet well established "rights" at that time, but the needs were handled primarily by various sources of private charity and/or self-ingenuity, IF the needs were met at all, but still the self-evident right to one's own flesh and blood was ever present, unquestioned in all situations.

32. Go back just a couple or few millennia, and you're lucky if such basics of food, clothing and/or shelter *even exist at all within reasonable access*, let alone any fanciful dreams of wishful "rights" to such basic items, yet there was still your own flesh and blood, right there with you the whole entire time, as not only an unquestionable and self-evident right, but even as an implicit duty and responsibility, both to your mate/partner/spouse (who *is not* supposed to be a direct blood relation to the other mate/partner/spouse) and to your own flesh and blood offspring (which is a *direct blood* relationship, of crucial distinction herein), i.e., your own minor children.

33. From time immemorial, the right to one's own flesh and blood has always been the second oldest right in human existence (regardless of the many variants of civilizations and their many varied systems of law...), save only that individual primary right to preservation of one's own life itself. This is universal, the self-evident right to children precedes mere common law or any other formally written-down "laws" of the United States, and of the Colonies before that, and also of the ancient "laws" of England even post Magna Carta, precedes the establishments of written "laws" by the long-lived Byzantine Empire prior to that, of the Romans and Greeks and Egyptians before them, and of the Sumerians even well before *any* of those early civilizations.

34. The self-evident right of preservation and protection from any interference or harm to your own parent-child relationship by any type of self-professed ruling authority (“government” – regardless of the form or type), especially when there is no actual, valid basis of any proper kind, *is*, by definition of nature and human existence itself, the second oldest indisputable “natural” or “organic” right, save only that primary right to self-survival... irrespective of any sets of “statutes” that must, in fact, fall directly flat on their constitutionally repugnant faces for even ostensibly attempting to pretend otherwise in any manner, shape or form. The RIGHT to one’s own direct flesh and blood (“natural”) minor children is sovereign and absolute, superior to the State in **all** respects, and CANNOT be interfered with, whatsoever, save *only* on exception for due process finding in clear and convincing evidence of *serious* parental unfitness.

35. All U.S. citizen natural parents, both male and female, father and mother both, if both are legal adults at the time of a physical conception (a normal pregnancy), *equally* have and *equally* share full legal and physical custodial rights to their mutual natural child, automatically vested into each and both such natural parents, from the very moment of birth of each such living child; There is no magical difference between the pre-existing, full legal and physical child custodial rights enjoyed and retained by a given parent sued by child protection services (MD = “DHS”), or the very same and exactly equal, pre-existing, full legal and physical child custodial rights enjoyed and retained by a given parent sued in divorce-and-similar-with-kids family court – both situations are exactly the same, with the state action alleging, whether expressly revealed or not, that the targeted (generally “respondent” or “defendant”) party is too seriously unfit to continue *retaining* his or her pre-existing, well-established, superior child custodial rights in full force, yet of course that requires the State to first prove “unfitness” by clear and convincing evidence under full due process procedures, including that parent’s right to invoke trial by jury upon the same.

36. Well over one hundred (100+) years of consistent, enormous case law from both the state and federal courts also routinely affirms: (a) that not only are these same parental custodial rights to their natural minor child *superior* to “mere” constitutional rights, i.e., these custodial rights are always entitled to full due process protections in at least the same full procedural measure as any so-called “mere” right enumerated by our Federal Constitution, i.e., *more* important than those “mere” guarantees within the Bill of Rights and elsewhere; (b) but also that the State cannot even begin to question, let alone invade or impinge upon, those pre-existing, fully vested legal and physical custodial rights that natural parents have to their own minor children, unless and until the State would *first* prove, and then only by clear and convincing evidence performed under full due process procedures, that either or both such natural parent(s) is/are found *seriously* “unfit” within a competent court of proper jurisdiction, too *seriously* unfit to continue *retaining* their same such pre-existing and already fully vested legal and physical custodial rights to such child.

37. These fundamental rights of natural parents, and equally shared betwixt both such natural parents, to the uninterrupted care, custody, control and management of their minor child, and those same natural “organic” rights of each and both natural parents also fully endowed and vested within both of them equally from the very moment of live birth of each such said child, simply may not be intruded upon by the State (*see also* Invasion of Privacy), without valid cause.

38. Our Supreme Court, fully recognizing all of the above history underpinning these same fundamentals, has – more than once – opined that parental rights are “superior” to the “mere” enumerated rights of our Federal Constitution, hence they are clearly entitled to *at least* that full amount of all due process protection elements and procedures that any actually-enumerated such right is well established in entitlement thereof, and has consistently ruled that federal courts **do**

have valid and proper subject matter jurisdiction – as well as the attendant duty to exercise that federal jurisdiction – upon claims of state unconstitutionality over those natural parental rights.

39. Our Supreme Court has **expressly** ruled and commanded: “Parents have a fundamental right to the custody of their children, and the deprivation of that right effects a cognizable injury. See *Santosky v. Kramer*, 455 U.S. 745, 758-59, 102 S. Ct. 1388, 1397, 71 L. Ed. 2d 599 (1982).” *Troxel v. Granville*, 530 U.S. 57, 68-69, 147 L. Ed. 2d 49, 120 S. Ct. 2054 (2000). Violations of parents’ federal constitutional and/or due process rights within any state action affecting child custody rights, according to the U.S. Supreme Court, **are** cognizable claims in the federal courts, exactly and precisely as we now have at bar herein, which exercise of jurisdiction is *required*, and which exercise of jurisdiction to **directly intervene** into the state court matter complained of is expressly provided by primal statutory authority itself herein, to-wit: 28 USC § 1443.

THE STATE HAS DIRECTLY VIOLATED CLEAR FUNDAMENTAL RIGHTS IN PRE-DEPRIVATION OF ALL THE SAME WITHOUT ANY DUE PROCESS WHATSOEVER

40. The State of Maryland has **never even alleged** (let alone proven) any “unfitness” by me, ever, nor has any department, agency, unit or any actor of the State ever even remotely alleged any such aspect or idea, let alone ever proven it under required clear and convincing due process.

41. Within divorce and similar proceedings, it is an utter fallacy, an outright unconstitutional fraud, and a legal nullity, for any state court to attempt to pretend to “grant” or “award” any form of custody (“legal” and/or “physical”) of any child to either and/or both natural parents of that child, since *they both already have* child custody rights fully vested into each and both of them, long prior to ever entering into any state court action; The given state court in any such similar proceeding (*i.e., not discussing post-deprivation actions in the realm of child protective services cases, which are quite different in their origination and purposes as between the state and the*

given parent or parents) cannot falsely and fraudulently pretend to ostensibly “award” or “grant” something *it does not have* (child custody) to someone *who already has it* (child custody) *fully*, or more correctly described as fully flagrant discrimination and fraud by typically allowing just one parent to continue *retaining* her/his pre-existing child custody rights, but in fact *removing* the other parent’s exact same and also pre-existing child custody rights, without so much as even bothering to inform that other parent that all such rights are constitutionally-protected rights *that cannot be simply taken away* without first going through full due process, i.e., perpetrating all manner of unlawful administrative end-runs, by repugnant statutes, against constitutional rights, to (a) defraud the unsuspecting parents of their superior rights *without even telling them that is what is actually going on*, (b) in order to falsely reclassify those same unsuspecting parents into so-called “noncustodial” parents, (c) so as to begin generating yet more financial windstreams.

42. Any statute, regulation, or rule pretending to ostensibly provide any state court with authority to grant or award child custody, within divorce and similar actions involving children, *but without also requiring first an affirmative due process finding of serious parental unfitness*, is directly unconstitutional upon its face, *must* fail the test of constitutionality, and is also hereby directly challenged as patently unconstitutional for all the aforementioned commanding reasons.

43. To be sure, the civil courts of Maryland have valid subject matter jurisdiction over people that choose to divorce, in order to process a peaceful, lawful separation of parties and involved assets and debts, as well as compelling execution of necessary instruments to effect those goals, because that is a civil court process constitutionally allowed between **non-blood** relationships.

44. However, just because two separate non-blood parental parties divorce and/or otherwise legally separate, that does not provide any Maryland civil court with subject matter jurisdiction over the parent-child relationships of either same natural parent, *without first finding unfitness*.

45. Again, Petitioner will readily concede that the state civil courts obviously have clear and valid subject matter jurisdiction over two or more parties in dispute regarding separation of *their own non-blood relationships*, i.e., such as a dissolution of marriage (inapplicable herein), but no state civil court has ever obtained proper subject matter jurisdiction over the **direct blood** relationship between any parent and his/her minor child, *unless and until* due process is *first* met.

THE STATE MAY *NOT* USE PREPONDERANCE AS THE EVIDENTIARY
STANDARD OF PROOF TO IMPACT CUSTODIAL RIGHTS OVER MINOR CHILDREN

46. Petitioner realleges all paragraphs above by reference the same as if fully set forth herein.

47. Besides repugnant custody alterations without fitness tests, *the evidentiary standard* fails.

48. The State of Maryland already well knows, and has well known for a lengthy established period *in minimum of at least decades now*, that it may not terminate the custodial rights of the given natural parent to his/her natural children without first finding serious, clear and convincing evidence of parental unfitness. These actions are familiarly known as “TPR cases” (termination of parental rights cases), i.e., most often publicly referred to as “CPS cases” (child protection services cases), which are one and the very same thing – as any competent legal professional readily knows. Even first-semester law students well instinctively know these very basic things.

49. Yet, here’s the thing... The judicial officers and attorneys daily engaged within state “family” courts having involvement with domestic relations matters *already know full well* that they cannot simply usurp a given parent’s custodial rights within their active divorce and other similar cases betwixt two competing natural parents (“custody, support, and visitation” cases), because both yesterday and tomorrow, either in the exact same courtroom, or the one next door, or downstairs, or around the corner, they are also processing these TPR cases in which they all are already well aware about the need for sustaining *clear and convincing evidence of unfitness*.

50. The instant state court “child custody case” began wholly unconstitutionally within Frederick County and by agents of the State of Maryland removing my superior natural parental rights to my child without ever once having basis against me and my parent-child relationship, whatsoever, and continued those equally unconstitutional deprivations of my rights (liberty) and of my monies (property) for the next several long years for all the Respondents’ fraudulent and unjust enrichments.

51. Accordingly, this conclusively demonstrates that your Petitioner’s fundamental rights to the constitutionally-guaranteed *retention* of his natural child custody rights (and of all attendant rights thereto), were defrauded **knowingly, willfully and intentionally** by the legal professionals criminally conspiring within the instant state court case complained of, to-wit: the (prior) state court judges, the family law attorneys familiar to the county, and their any various other leeches like any “guardian ad litem” or “parenting coordinator” who collude in that ongoing conspiracy.

STATE JUDGES ARE DISQUALIFIED FROM THEIR OWN TITLE IV-D MATTERS

52. Next, and independently, as regards any origination of child support orders in the first place, and as further regards any enforcement of child support orders originated within the same Frederick County, every judge and court of the same county is absolutely precluded by law from doing either of the same, since no judge may hear or address any matters in which the same judge has either a direct pecuniary interest (and that includes any involved business) and/or other working relationship with any beneficiary to such pecuniary interests, i.e., the other county officials, county agents, county units, and of course also the actual same given County itself.

53. In 1975, the federal government determined that the best way to help women and children move from public assistance to self-sufficiency was to help them collect child support from the fathers. To ensure that states followed through with this idea, a state's receipt of welfare funding

(under Title IV-A of the Social Security Act) was tied to its creation and operation of a child support enforcement program (under Title IV-D of the Social Security Act; hence the name “IV-D”). [S. REP. NO. 1356, 93d Cong., 2nd Sess. (1974)].

54. Nationwide, the child support program is governed almost exclusively by federal regulations. Title IV-D, 42 U.S.C. §651, et seq., spells out in great detail the standards state programs must meet to qualify for funding; The Maryland OAG has contracted with counties to provide IV-D services for all divorce and similar domestic relations cases within each county involving minor children.

55. The contractual arrangements of Title IV-D ostensibly authorize counties to enter into various agreements regarding Title IV-D services, and under a complicated formula, establishes various portions of the Title IV-D financial collections stream to be paid out in various percentages to the given county itself, the clerk of the county, the prosecutor of the county, and the judges of the county, whether by direct apportionment into their own salaries, budgets and/or otherwise. In short, it repugnantly creates a direct mercenary system, inducing rights violations by the same state actors on a truly massive scale against the unsuspecting and innocent citizenry.

56. As such, Maryland family court judges have direct pecuniary interests as to the collection (“enforcement”) of *their very own* child support orders, the same going for every judge of their county likewise, hence court rules *preclude* any judge in their own county from - at least - presiding over any such child support matters, if not also completely from the entire given case.

57. The laws, rights and standards of the State of Maryland, especially with respect to judges, must be substantially the same as the general ethics laws, rights, and standards of the various Sister States, including therefore also the State of Texas, and so must also, therefore, be the vast majority of concurring legal maxims involving conflicts of any fiduciary and/or other interests

by judicial officers with respect to which kinds of cases they are allowed to be constitutionally or otherwise “lawfully” engaged in. To disqualify a judge, typically the said interest should be direct and pecuniary. “[T]he interest which disqualifies a judge is that interest, however small, which rests upon a direct pecuniary or personal interest *in the result of the case* presented to the judge or court.” Cameron v. Greenhill, 582 SW2d 775, 776 (Tex. 1979). (emphasis added) In Nalle v. City of Austin, 22 SW 668 (Tex. 1893), the Texas Supreme Court determined that the district judge who presided over the suit was indeed disqualified because he lived in and paid taxes to the City of Austin. The suit was brought by a property owner to enjoin collection of taxes and to cancel \$900,000 in bonds already issued. The injunction effectively prevented the tax levy. The Supreme Court said every property holder not only has an interest but a direct pecuniary interest in the result. By living and paying taxes in Austin, the judge was disqualified. A judge who is a stockholder in a corporation is disqualified from hearing a case in which that corporation is a party – Pahl v. Whitt, 304 SW2d 250 (Tex. App. – El Paso 1957, no writ history). The employment of the judge’s wife by the defendant corporation was a direct pecuniary interest amounting to disqualification – Gulf Maritime Warehouse v. Towers, 858 SW2d 556 (Tex. App. – Beaumont 1993, denied). A trial judge’s entry in the lawsuit by filing an answer and seeking attorney fees against the party filing a recusal motion created a direct pecuniary interest sufficient to disqualify – Blanchard v. Krueger, 916 SW2d 15 (Tex. App. – Houston [1st Dist.] 1995, no writ history). A trial judge whose pay was tied to the conviction rate in a drug impact court had a pecuniary interest and was disqualified – Sanchez v. State, 926 SW2d 391 (Tex. App. – El Paso 1996, Ref.).

58. And all such pecuniary conflicts of interest of judicial officers are established nationwide as standard, the primary point being: Judges may **never** engage in matters involving conflicts.

59. Because Maryland family court judges, like the pending matters at hand, may also involve enforcement action over an alleged child support arrearage matter within the same county case aligned and interplexed with their own Title IV-D financial interests, the judges of the given County are *clearly precluded by law* from presiding in *their local own* such child support cases.

60. Frederick County, also the prior judges of the instant state courts, with the opposing counsels and their client (the Respondent herein), and certain other state and/or local governmental actors necessarily involved in such civil and/or criminal conspiracy, have already been defrauding large sums of money from me (Property rights – an established federal question), and *that* based upon *also* defrauding me of my well associated rights of “parenting time” and other “care, custody, control and management” rights to and with my own flesh and blood minor child (involving the various Liberty rights akin to those same direct blood relationships), along with certain other forms and methods of harassment and abuse of power over myself and my parent-child relationships, all without *ever* having **any** constitutionally-valid jurisdictional basis, nor any actual constitutionally-valid merit, in any of that, in the first place.

VIOLATIONS OF THE CONSUMER CREDIT PROTECTION AND FALSE CLAIMS ACTS

61. The Federal Consumer Credit Protection Act (“CCPA”), *see* 15 USC §§ 1601, et seq., controls and limits the maximum allowable regular (*cyclic*, i.e., weekly, bi-weekly, bi-monthly, monthly, etc.) amount of “child support” orders (actually, any and all “family support” orders) to expressly **ONLY** no more than certain maximum percentages of the ostensible obligor’s **actual disposable income**, i.e., the person’s actual, real, existing regular income, whatever that is, be that actual disposable income anywhere from ZERO dollars per regular cycle (i.e., unemployed) to apparently no maximum limit (theoretically even a million dollars weekly or infinitely more).

62. There is absolutely no toleration for the wanton practice of state courts attempting to use “imputed” income, i.e., imaginary, fictitious, wishful-thinking “fantasy” income, but ONLY the ostensible obligor’s *actual, real disposable income* may be used to consider garnishment levels in direct percentage, which maximum limit is spelled out in 15 USC § 1673 – a very short statute commonly imprinted upon virtually every child support “income withholding” order in America.

63. To the point herein, the instant state court, the instant judicial officers of the same, and all of the above-referenced individual and corporate Respondents, as well as the above-referenced state court counsel of Respondent Beth M. Dixon, that is to say, her divorce counsel, over the (very) long course of the instant state case now removed, have all knowingly and also repeatedly violated the federal maximum amount and percentage limits of such “child support” orders and their related garnishment orders that they have knowingly and fraudulently created and issued against your Petitioner and my property (my money), i.e., knowingly and repeatedly violated the very well established and statutory maximum limits clearly enumerated under and within 15 USC § 1673(b)(2). They all knew that they were issuing fraudulent and void orders indicating amounts of garnishment well and way beyond the maximum limits of law – indeed, the instant state court record in fact contains prior filings by this Petitioner for “downward modification” of such patently false “child support” regular amounts, by clearly attesting to facts demonstrating much lower actual disposable personal income.

64. Accordingly, each and every such above related child support “order” issued knowingly above and beyond the maximum limits of law are entirely null and void, expressly by law. *Id.* There is no lawful “civil debt” of such supposed “child support” (expressly fraudulent) “lien” lawfully held against me, and there never has been. It simply does not lawfully exist, at all, pursuant to the express mandate of federal statutory law – the supposed “civil debt” of supposed

“child support” simply does not exist, because the state court conspirators got far too greedy and knowingly exceeded the absolute maximum limits of law in “deciding” what amounts of wholly false, fictitious and fraudulent “liens” in the equally false disguise of “child support” obtained by them only after initially defrauding my entire litany of established fundamental rights to retain full custody rights to my minor children in complete absence of any serious parental unfitness.

65. And then yet further, each and every such same act was, and is, also yet another solid proof in additional evidenced act of not only the various other aforementioned state and federal felony crimes, but obviously and indisputably again as yet another separate act perpetrated in their ongoing criminal conspiracy to wantonly and willfully defraud the United States and the Federal Government, i.e., each separate and additional act of making knowing False Claims for unlawfully seeking federal reimbursements under the same aforementioned Title IV-D scheme, that same (gargantuan...) pecuniary “windfall” scheme that state court (county) judges, clerks, and prosecutors, and/or their own personal budgets, all (grossly unethically) receive shares from.

RECAP

66. Therefore, your Petitioner has been unlawfully and directly subjected to a minimum of three (3) independent causes of action for direct removal under special civil rights Section 1443, i.e., false deprivation of parent-child relationships without (any) due process (whatsoever), the additional constitutional infirmity of failing to use the clear and convincing evidentiary standard in all matters allegedly pertaining to any action prospecting to impact the custody of any one or more minor children, and the equally-as-clear constitutional violations regarding the manifestly express Title IV-D conflicts of interest of state judicial officers precluding their involvements.

67. *Each* of the same three (3) constitutional questions is also an *independent* removal basis.

68. Furthermore, your Petitioner complains and alleges federal civil rights torts and direct, additional federal court jurisdiction over the instant Consumer Credit Protection Act claims, and demands replevin or other refund of all monies taken without due process thereunder, and further claims damages and remedies for said expressly-unlawful “contempt” jailing of this Petitioner, and that all same acts are civil and criminal wrongdoing perpetrated by the instant Respondents and their state court actors as described in direct and knowing violations of the federal False Claims Act for wanton and massive conspiracy to defraud the United States through Title IV-D.

69. Furthermore, your Petitioner complains for the instant federal civil rights torts and direct federal court jurisdiction over those independent claims, and demands replevin or other refund of all Property (monies) taken without due process thereunder, further claiming civil damages for potential threats of jailing this Petitioner without jurisdiction (1st, 4th and 14th Amendments).

70. Accordingly, this Petitioner is most certainly entitled by law to full and complete restoral and remedy for **all monies**, including no less than all guise of “child support”, all the costs and expenses – including all attorneys’ fees – incurred as a result of all the false and malicious acts of categorically frivolous prosecutions and related abuses of power fraudulently inflicted upon both myself and my child by the Respondents and their criminal conspirators in said matters, also both the direct and consequential financial damages to my person and estate caused and/or induced by the Respondents and their various said co-conspirators in both person and entity form, and most certainly not to ignore the absolutely equal entitlement of law to full and complete remedy for the lost physical/tangible elements of my falsely-deprived parent-child relationships, that is to say compelled additional parenting time beyond the basic 50/50 requirement, routinely exercised until such time as proper overall time balance of divided parenting time betwixt the parties is finally restored to an equitable status quo – and that such “makeup time” must begin promptly,

that is to say that, because Respondent Beth M. Dixon has unconstitutionally enjoyed the vast majority of my child's life by constant, long-ongoing violations of my equal rights for the former and previous several years, I am constitutionally entitled to be made whole again, which is to say that compelled additional parenting time beyond the basic 50/50 requirement, routinely exercised until such time as proper overall time balance of divided parenting time betwixt the parties is finally restored to an equitable status quo, i.e., I am entitled to an extra ongoing amount of "parenting time" beyond that 50/50 share in pro-rated measure to compensate for all of the years of parenting time I have been falsely deprived of.

COUNTS I THROUGH X – Gender Discrimination, Violations of Equal Protection,
Violations of Pre-Deprivation Due Process, and other Constitutional Violations

[AGAINST ALL RESPONDENTS, AND OTHER PARTIES TO BE NAMED / SERVED]

71. Petitioner realleges all paragraphs above by reference the same as if fully set forth herein.

72. From the very beginning, although my equivalent paternity and custodial rights regarding all aspects of and to both of my natural children were therefore already legally established, both as above-described in much detail, with the further doctrine of "child of the marriage" also as fully applicable herein, and although those custodial rights are very well established as superior to the State's **any** interest (which must *also* pass strict scrutiny, least intrusive, and such other constitutional hurdles), none of the Respondents, nor any state actor, has ever alleged any form or manner of serious parental unfitness against me, hence has never actually or validly initiated, let alone proven under due process procedures..., any form or manner of unfitness deprivation action against me ("termination of parental rights"), hence they have never removed any part of my absolutely same and equal share of all such pre-existing custody rights to both of my natural minor children with Respondent Beth M. Dixon in full like and equal kind... whatsoever.

73. Hence, clearly your Petitioner has been unconstitutionally reclassified by the State of Maryland, vis-à-vis by the biased and prejudiced local Frederick County court systems and also by their variously aforementioned co-conspirators in full defiance of the Federal and Maryland Constitutions, arbitrarily and capriciously, as an utterly fictitious and so-called “noncustodial” parent, in full dearth of required pre-deprivation due process *whatsoever* before just unilaterally *removing and/or terminating* my custody rights, and then further making, issuing and executing all secondary forms of likewise unconstitutional actions, including both in terms of financial (Property rights) issues, as well as the familial, associative, injunctive and other violations of Liberty rights issues, and with a litany of other intertwined matters due to all the underlying wrongdoing by said adverse parties as acting in concert with other state actors by and through the substantive “conspiracy” elements in pending amendment via Section 1983 and other authorities. *See again, my Notice of Pending Amendment of Petition, et seq.*

74. So, the instant state court has both: (a) **never** had any actual constitutionally-compliant jurisdiction over either of the parental parties’ respective child custodial rights, *in the first place*; and (b) its various “orders” amount to **nothing** more than proof of fraud, proof of blatant gender discrimination, proof of total disdain for equal protection of the laws, proof of total disregard for equal privileges and immunities, and solid proof of also unilaterally elevating Respondent Beth’s “equal” rights, but further unilaterally demoting the exact same “equal” rights of your Petitioner

75. This arbitrary, lawlessly disparate treatment and blatant gender discrimination originally continued for years upon this Petitioner, under repetitively meritless, frivolous actions filed by Respondents and their attorneys subsequently rubber-stamped by the instant state courts in like meritless fashion, also even willfully and intentionally performing additionally-unlawful acts.

76. The cause of action and civil damages for deprivation of parent-child relationship is well established in both the federal and state court systems. Within the federal system, the damages awarded are typically between \$110k to \$130k per child, per year. Within the state courts, these damages awarded are typically only between \$40k to \$60k per child, per year. Your Petitioner now elects to prosecute this cause of action as fully established within the federal court system, which is why it is included and delineated amongst these federal set of Counts in the list below.

77. Specific, individually listed Counts I through X follow, each to be amended within time allowed by Rule 15(a); See also Notice of Pending Amendment of Petition into Full Complaint.

78. Your Petitioner is entitled to and claims civil damages for false and tortious deprivation of parent-child relationship in varying degrees and times over the aforementioned several years.

79. Your Petitioner is entitled to and claims civil damages under 42 USC § 1981.

80. Your Petitioner is entitled to and claims civil damages under 42 USC § 1983.

81. Your Petitioner is entitled to and claims civil damages under 42 USC § 1985.

82. Your Petitioner is entitled to and claims civil damages under 42 USC § 1986.

83. Your Petitioner is entitled to and claims civil damages under 42 USC § 2000b-2.

84. Your Petitioner is entitled to and claims civil damages under U.S. Const., Amend. I for violations of the rights to free assembly, to familial association, and to petition for redress.

85. Your Petitioner is entitled to and claims civil damages under U.S. Const., Amend. IV for unreasonable seizures (both of liberty and property), including actual false seizures and also threats to further falsely seize my body and person.

86. Your Petitioner is entitled to and claims civil damages under U.S. Const., Amend V for deprivations of both liberty and property without due process of law.

87. Your Petitioner is entitled to and claims civil damages under U.S. Const., Amend. XIV for violations of equal protection, equal privileges and immunities, and gender discrimination.

88. Your Petitioner is also entitled to and claims special and/or punitive damages.

89. Your Petitioner is also entitled to and claims trial by jury of peers upon all issues.

WHEREFORE, your Petitioner prays this Court issue a declaratory judgment finding that the lower state court proceedings now removed are void for lack of pre-deprivation due process, that this Petitioner was never lawfully reclassified as a “noncustodial” parent, and that the State failed to first properly allege and adjudicate serious parental unfitness as a legal prerequisite to any such reclassification, also for one or more appropriate civil damages awards by peer jury in favor of Petitioner, against the Respondents jointly and severally with additional liable parties yet to be formally served, and for all other relief that is true, just, lawful and proper in the premises.

COUNTS XI THROUGH XVII – STATE LAW CLAIMS UNDER 28 USC § 1367

[AGAINST ALL RESPONDENTS, AND OTHER PARTIES TO BE NAMED / SERVED]

90. Petitioner realleges all paragraphs above by reference the same as if fully set forth herein.

91. All of the state law, common law, and tort type claims are so interdependent and also so inextricably intertwined with all the above federal claims as to be exactly the same in reality, and inseparable from each other’s context, hence supplemental jurisdiction is well entitled and had.

92. The cause of action and civil damages for deprivation of parent-child relationship is well established in both the federal and state court systems. Within the federal system, the damages awarded are typically between \$110k to \$130k per child, per year. Within the state courts, these damages awarded are typically only between \$40k to \$60k per child, per year. Your Petitioner now elects to prosecute this cause of action as fully established within the federal court system, which is why it is included and delineated amongst the federal set of Counts in the above section.

93. By falsely reclassifying your Petitioner as a so-called “noncustodial” parent, in order to create a legally-fictitious civil debt of child support and falsely order extractions of large sums of money in the guise of said support, your Petitioner is entitled to have the Respondent promptly refund, with interest and penalties attached, the entirety of all said payment transfers, and your Petitioner further therein additionally alleges fraud and/or constructive fraud clearly perpetrated against fundamental, constitutional, statutory and other rights, for purposes of treble damages.

94. Specific, individually listed Counts XI through XVII follow next, each to be amended within time allowed; *See also* Notice of Pending Amendment of Petition into Full Complaint.

95. Your Petitioner is entitled to and claims civil damages under replevin of all monies taken falsely and/or fraudulently, via ostensible orders for child support, and due to frivolous litigation.

96. Your Petitioner is entitled to and claims civil damages for fraud and wanton conduct.

97. Your Petitioner is entitled to and claims civil damages for infliction of emotional distress.

98. Your Petitioner is entitled to and claims civil damages for malicious prosecution.

99. Your Petitioner is entitled to and claims civil damages for gross negligence.

100. Your Petitioner is entitled to and claims civil damages for abuse of process.

101. Your Petitioner is entitled to and claims civil damages for false arrest and wrongful imprisonment, and for threats of repeating the same unlawful acts and violations of rights, separately as state law claims, in addition to the same as civil rights claims under the Federal Constitution and other federal authorities as stated in the above section.

102. Your Petitioner is also entitled to and claims special and/or punitive damages.

103. Your Petitioner is also entitled to and claims trial by jury of peers upon all issues.

WHEREFORE, your Petitioner prays this Court to exercise its supplemental jurisdiction in issuing certain supporting declaratory judgments towards such trial by peer jury on these issues,

also for one or more appropriate civil damages awards by said jury in favor of Petitioner, against the Respondent jointly and severally with additional liable parties yet to be formally named and served, and prays for all other relief that is true, just, lawful and proper within the premises.

SUMMARY AND PRAYER

104. Petitioner reiterates that his request for removal to this Court is not just about a supported and reasonable *expectation* of the future manifest deprivations of his various civil rights within said state court, but also that recklessly unlawful patterns of the same are **now well established**.

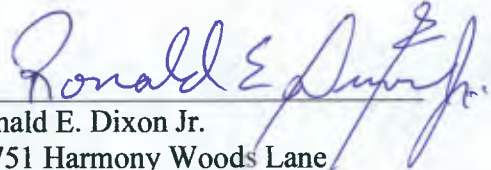
105. Without the immediate intervention, and the exercise of full jurisdiction and authority by this Honorable Court in retaining said lower state proceedings, at the very least with which to issue such appropriate declaratory and injunctive relief as to due process and equal civil rights, that this Petitioner may be otherwise subjected to manifestly *egregious* denials and inability to enforce in said state courts ‘one or more rights under the laws providing for the equal rights of citizens of the United States’, and will also be likewise unlawfully forced to suffer manifestly *irreparable* harm and due process injuries therein, without any further *reasonable* remedy at law.

106. This Petition and the above basic emergency set of Counts will be soon amended into full version and served. *See again*, the undersigned Petitioner’s contemporaneously-filed Notice of Pending Amendment of Petition into Full Complaint.

WHEREFORE, your undersigned Petitioner, Ronald E. Dixon Jr., now prays for retaining the removal of the instant state court proceedings under the jurisdiction of this United States District Court upon the direct facial challenges raised to statutes, at a minimum for appropriate declaratory and injunctive relief, and/or to further decide any supplementary matters regarding the state law claims as are inextricably intertwined, for TRIAL BY JURY as reserved, as duly

claimed, and by right of law upon all issues so triable, for appropriate awards of civil damages in Petitioner's favor, to ORDER the Respondents to pay all costs, fees, and reasonable attorney expenses herein, and prays for all other relief that is true, just and proper within these premises.

Respectfully submitted,

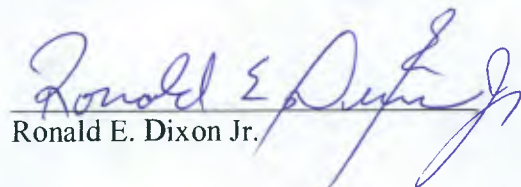


Ronald E. Dixon Jr.
18751 Harmony Woods Lane
Germantown, MD 20874
Tel: (202) 531-8661
Email: ronald Dixon410@hotmail.com
Pro Se Petitioner Party of Record

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 27th day of March, 2018.



Ronald E. Dixon Jr.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Ronald E. Dixon Jr.

(b) County of Residence of First Listed Plaintiff Montgomery (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) (pro se) - see Notice of Appearance (Civil)

DEFENDANTS

State of Maryland, et al. - see Attachment

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

MD AG Brian Frosh

RDB 18CV088

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC 1443, 15 USC §§ 1601, et seq., 31 USC § 3729, et seq., and 28 USC §§ 1331, 1343 and 1367. Brief description of cause: Sec. 1443 constitutional challenge to state statutes, CCPA, FCA, fed question, civil rights, supp state law claims

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: X Yes O No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE N/A DOCKET NUMBER N/A

DATE 3-27-18 FOR OFFICE USE ONLY

SIGNATURE OF ATTORNEY OF RECORD: Ronald E. Dixon Jr.

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Attachment to Civil Cover Sheet

State court parties include [*parties to serve until if/when their own counsel appears herein*]:

1. Petitioner herein [*Ronald E. Dixon Jr. – see Notice of Appearance (Civil)*];
2. Respondent herein [*State of Maryland*];
3. Respondent herein [*Frederick County Department of Social Services*]; and,
4. Respondent herein [*Beth W. Dixon*].

Party:

Party Service Information:

State of Maryland

State of Maryland
c/o Attorney General Brian Frosh
Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202

also,

William J. Prunka
State's Attorney, Frederick County Office
100 West Patrick Street
Frederick, MD 21701

Frederick County Department
of Social Services

Frederick County Department of Social Services
1888 North Market Street
P.O. Box 3066
Frederick, MD 21705-3066

Beth W. Dixon

Beth W. Dixon
503 Mount Vernon Place #3
Rockville, MD 20850

STATE COURT COUNSEL – FOR REFERENCE PURPOSES ONLY

(Assistant State's Attorney for FCDSS)

Susan M. Little
Office of the State's Attorney
P.O. Box 210
Frederick, MD 21705-0210