

**IN THE U.S DISTRICT COURT FOR
THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)**

April T. Ademiluyi
324 Main Street#171
Laurel, MD 20707

Plaintiff

v.

Carla N. Andrews
3403 21st Street, S.E.
Washington, DC 20020

Honorable Michael R Pearson,
In his personal capacity
200 St Paul Street
Baltimore, MD 21202

Honorable Sheila Tillerson Adams,
In her personal capacity
200 St Paul Street
Baltimore, MD 21202

Honorable Daneeka Varner Cotton,
In her personal capacity
200 St Paul Street
Baltimore, MD 21202

Anthony Brown,
In his personal capacity
200 St Paul Street
Baltimore, MD 21202

Defendants.

8:24 cv 03616

SECOND AMENDED COMPLAINT

Plaintiff, April T Ademiluyi brings an action at law against Defendants, Carla N. Andrews, Attorney General of Maryland, Anthony Brown, Judges Sheila T. Adams, Daneeka V. Cotton, and Michael R. Pearson for tortious interference with contractual relations and intentional infliction of emotional distress. Plaintiff also brings an action at law against

Defendants, Attorney General of Maryland, Anthony Brown, Judges Sheila T. Adams, Daneeka V. Cotton, and Michael R. Pearson pursuant to 42 U.S.C. § 1983 and the First Amendment of the United States Constitution. In support of her causes of action, Plaintiff Ademiluyi states as follows:

INTRODUCTION

1. Plaintiff Ademiluyi ran two campaigns for judge, in 2016 and 2020, in which she told voters that she believed the judges of the Circuit Court for Prince George's County were corrupt, and she would protect the people by seeking the assistance of law enforcement to end it. Ademiluyi put the public and the judges on notice, should she win, that she would report any criminal activity she witnessed or suspected from the judges.

2. The voters elected, Plaintiff April Ademiluyi to the bench of the Circuit Court for Prince George's County in 2020. Plaintiff Ademiluyi's victorious campaign included a video and blog statement about the corruption she experienced when she reported being drugged and raped by attorneys at a National Bar Association conference in Tampa, Florida in 2012. Ademiluyi's campaign video emphasized that she would not engage in the corruption she suspects was happening in the Circuit court for Prince George's County.

3. Because of Plaintiff's campaign videos and literature about the judges being corrupt and her intent to seek the assistance of law enforcement to end the corruption, she was met with hostility and feared by many in the judiciary that she would report the judges to law enforcement when she came to the bench.

4. Defendants, Judges Sheila Tillerson Adams, Michael Ray Pearson, and Daneeka Varner Cotton, and the attorneys involved in corruptly influencing prosecutors to cover up drugging and raping Ademiluyi together sought to retaliate against Ademiluyi for publicly

speaking about and reporting the drug rape and the corrupt coverup of the rape and suspected corruption within the Prince George's County Circuit Court.

5. Plaintiff Ademiluyi was receiving harassing letters from an imprisoned, convicted rapist serving a life sentence for drugging and raping women in Miami, Florida while a police officer, and she suspected the judges were behind it.

6. The judges sought to create a hostile work environment for Ademiluyi and get rid of her because they thought she was reporting them to law enforcement. During Ademiluyi's entire tenure, she did make numerous good faith reports of the judges engaging in criminal activity to law enforcement.

7. Plaintiff Ademiluyi discovered that someone was watching her emails and forged her signature on an order. Prince George's County IT informed her that the unauthorized access to her account could only be occurring internally. Only the administrative Judge could persuade IT to improperly access another judge's account. Adams intervened in Ademiluyi's investigation of who was accessing her account by directing IT not to further assist. The culprit attempted to manipulate computer records to hide who was accessing Ademiluyi's account. Thus, Ademiluyi knew that only Adams or Cotton could be the culprits. She immediately reported both to law enforcement and the Commission.

8. Judge Cotton admitted she wanted consequences for Plaintiff Ademiluyi, writing to Tanya Bernstein, Investigative Counsel ("Bernstein) for the Commission on Judicial Disabilities, "there should be some repercussions [for Ademiluyi's filing of her complaints]." Exhibit E.

9. Ademiluyi complained to the FBI that she suspected the judges were using an imprisoned, convicted rapist, to send her harassing letters and engaging in other criminal activity.

Unknowing the romance between Pearson and Cotton and Pearson's involvement in the retaliation, Ademiluyi informed Pearson of her complaint to the FBI, and that she had not heard from the FBI, and asked for his help. This caused Adams, Cotton, and Pearson to escalate the retaliation against Ademiluyi.

10. Attorney General Anthony Brown ("AG Brown or Brown"), is also unhappy about Ademiluyi's election to the bench. But Brown mostly feared Ademiluyi in good faith, reporting to law enforcement a conspiracy among judges, Warren Thompson("Thompson"), a large contributor to his campaigns, and his legislative colleagues to the pay the judges kickbacks for incarcerating children. Thompson's business ventures supply food to prisons and schools. Adams gave Thompson the contract to provide food services at the Prince George's County courthouse, which he has done without interruption for years. Ademiluyi's first campaign in 2016, created much hostility towards the judges, and caused the judges to stop mass incarcerating the children. But soon after Adams and former County Council Member Mel Franklin, who recently plead guilty to stealing from his campaign account, began the process building a juvenile detention facility that Thompson and the judges could have profited from. The prison did not require 24/7 lockdown thus it appeared to a venue for financial kickbacks to judges that would not invoke public scrutiny.

11. Brown leads the conspiracy with Pearson, Adams, Cotton, and other judges to engage in a retaliatory scheme because Ademiluyi was reporting to law enforcement.

PARTIES

12. Plaintiff, April Ademiluyi, is an adult female and resident of Maryland, who address is 324 Main Street #171 Laurel, MD 20707. She was elected to the bench of the Circuit Court for Prince George's County in November of 2020.

13. Defendant, Carla N. Andrews, is a freelance court reporter, who resides in the District of Columbia.

14. Defendant, Judge Michael R. Pearson, is an elected Judge of the Circuit Court for Prince George's County. Regarding Plaintiff's federal constitutional claims and torts claims alleged herein, Defendant Judge Pearson is sued only in his individual capacity.

15. Defendant Judge Sheila T. Adams is a formerly elected Judge of the Circuit court for Prince George's County. Regarding Plaintiff's federal constitutional claims and tort claims alleged herein, Defendant Judge Adams is sued only in her individual capacity. Judge Adams was the administrative judge at the time Judge Ademiluyi was elected to the bench until December 31, 2022.

16. Defendant Judge Daneeka V. Cotton is an elected Judge of the Circuit Court for Prince George's County. Regarding Plaintiff's federal constitutional claims and tort claims alleged herein, Defendant Judge Cotton is sued only in her individual capacity. Judge Cotton has been the administrative judge since January 1, 2023.

17. Defendant Anthony Brown ("Defendant Brown") is the elected Attorney General of Maryland. Regarding Plaintiff's federal constitutional claims and tort claims alleged herein, Defendant Brown is sued only in his individual capacity. Brown has been the Attorney General of Maryland since January 1, 2023.

JURISDICTION AND VENUE

18. Venue is proper in the District of Maryland pursuant to 28 U.S.C. § 1391(b) because the events or omissions giving rise to the conduct complained of occurred in this district.

Venue is also proper because Maryland has personal jurisdiction over the Defendants, due to the Defendants' actions that caused tortious injury within Maryland.

19. This Court has subject matter jurisdiction over Plaintiff's federal constitutional claims pursuant to 28 U.S.C. § 1331 and 42 U.S.C. §§ 1983.

20. This Court has supplemental jurisdiction over the claims against Carla N. Andrews.

FACTS

Plaintiff's 2016 and 2020 campaigns gave advance notice to the public and the judges that Ademiluyi would report criminal activity to law enforcement

21. In 2016, Ademiluyi ran for judge of the Circuit Court for Prince George's County, where she campaigned on *et al* the news reports that suggested the judges were profiting from mass incarceration of children through kickbacks from contracts with the State.

See <https://www.nytimes.com/2014/12/20/us/judge-in-maryland-locks-up-youths-and-rules-their-lives.html>

22. The news called attention specifically to Judge Herman Dawson's ("hereinafter referred to Dawson") rulings to impose extremely lengthy sentences of incarceration on children for trivial issues. Adams, the administrative judge, assigned Dawson to those juvenile cases. Adams is a 30-year veteran of the judiciary with a lot of power and influences over judges.

23. In the 2016 campaign, Ademiluyi created a campaign video that drew a comparison of Dawson to the kids for cash scandal in Pennsylvania and told voters it was time to end the corruption. In that scandal, the administrative judge, whom all the judges feared, built a detention facility for juveniles where he and the judge he assigned to hear juvenile cases were receiving kickbacks from placing the children in the facility. The DOJ prosecuted both judges.

One judge pleaded guilty, and the other was tried and convicted. Ademiluyi, in her campaign materials, vowed to fight corruption on the Prince George's County Circuit Court. During the campaign, the video was posted on YouTube by an anonymous source and remains to date. See <https://youtu.be/WWFe--eV3qg> Last Visited 3/17/25

24. Brown opposed Plaintiff's campaign about the mass incarceration of children for a profit with hostility and abusive conduct towards those who supported her campaign. Jane Doe, a campaign staffer for Ademiluyi's campaign, complained to Plaintiff's campaign manager that Anthony Brown approached her in an aggressive manner, snatched Ademiluyi's campaign flyer from her hand, and threw the flyer away. Brown later called Ademiluyi's campaign manager, Jane Doe 2, and scolded her for working on Ademiluyi's campaign.

25. During the 2016 election cycle, Brown was running for Congress in the 4th Congressional District, where Ademiluyi resides. Brown won the race and served until he was elected Attorney General of Maryland in 2022.

26. Defendant Brown, a resident of Prince George's County, served as the Lieutenant Governor of Maryland from 2007 to 2015, during which he was influential in former Governor Martin O'Malley appointing Prince George's County judges including Cotton and Pearson to the bench.

27. The Governor, or in his absence, Lieutenant Governor serves on the Board of Public Works that is vested in approving contracts with the state over \$200,000 after they undergo the procurement process.

28. During Brown's tenure as Lieutenant Governor, the incumbent Governor expressly highlighted concerns of fraud and abuse with the state's contract procurement process across multiple agencies. See <https://www.cbsnews.com/baltimore/news/omalley-asks-for->

review-of-procurement-process/. In Maryland juvenile detentions facilities are operated by DJS. During the time of Dawson's mass incarceration of children, the Office of Legislative Audits routine audit for the Department of Juvenile Services ("DJS") found that

DJS routinely used several vendors for individual small purchases of various goods (such as uniforms and food products) and services (such as sign language interpretation and salon services) without obtaining competitive bids. Specifically, we identified six vendors that DJS paid approximately \$2.3 million (which individually ranged from approximately \$185,000 to \$604,000) during fiscal years 2010 through 2012 without bidding out services on an agency-wide or regional basis. Consequently, there is a lack of assurance that the State obtained these goods and services at the lowest possible cost.

May 2014 Report for years 2009 to 2012 www.ola.state.md.us. The following report found that:

DJS circumvented State procurement regulations by artificially dividing procurements to certain vendors so that each was \$15,000 or less. Specifically, during fiscal years 2014 through 2016, DJS made payments to 22 vendors totaling approximately \$9 million, of which approximately \$7.5 million related to procurements of \$15,000 or less. For example, during that period, one vendor received 204 payments totaling approximately \$1.5 million, of which 202 were for \$15,000 or less. Several of these purchases occurred over short periods. For example, 25 purchase orders for \$15,000 or less were issued to this vendor for similar services over a three-day period in July 2014. As a result, DJS did not maximize the State's purchasing power to obtain enhanced pricing for volume discounts and circumvented State procurement regulations, including provisions requiring control agency approvals. DJS employees were able to directly solicit, receive, and evaluate bids, and select a vendor without extensive involvement of DJS procurement personnel in the related procurement process. Certain of these procurements also appeared questionable.

November 2017 Report for years 2012-2015 www.ola.state.md.us.

29. On December 7, 2011, former Maryland Treasurer Nancy Kopp said at a Board of Public Works meeting, attended by Anthony Brown, "I must admit Juvenile Services also always jumps to the fore of my mind, we don't always do sufficient oversight of the contracts and the carrying out of public responsibilities." Defendant Brown quickly jumped in and changed the subject. Trans. at 35.

30. As noted by Plaintiff Ademiluyi during both of her political campaigns, juvenile detention facilities require services for children that generate lucrative business opportunities therefore mass incarceration of them becomes profitable and targets of corruption. DJS specifically generated lucrative contracting opportunities that increase profitability as the number of incarcerated children increases or the length of their sentences are lengthy.

31. Under Brown's tenure as Attorney General, the Maryland Department of Juvenile Services refused Ademiluyi's public records request to make public a list of their prime contractors. But a list of subcontractors was provided to Ademiluyi. Ademiluyi was informed in writing by the Department that they would have to "create a new record" to provide her a list so they are not required to provide her a list. All public records request are reviewed and ultimately controlled by AG Brown. Brown's lack of transparency suggests he is hiding the names of contractors who are giving kickbacks to the judges to incarcerate children.

32. The appearance of ongoing public corruption and Ademiluyi's promise to fight and end the corruption was a major focus of Ademiluyi's 2016 campaign. Ademiluyi lost the Democratic Primary in 2016, but the Libertarian Party put her on the general election ballot because they too believed her ability to seek the assistance of law enforcement to end the corruption on the Prince George's County Circuit Court. The political discussion about how to best identify and fight corruption created backlash for the judges and hostile public scrutiny towards Judge Herman Dawson during the campaign.

33. In the 2016 campaign among Prince George's County residents, Plaintiff Ademiluyi also shared her tragic experience of being drugged and raped at a National Bar Association conference and the corrupt cover up lead by Daryl Parks, Esq. ("Parks"), Ben Crump, Esq. ("Crump"), in a campaign video and blog statement on her website. Ademiluyi vowed in

her campaign that because of her experience of being further victimized by public corruption, she promises that she will see that any corrupt judges are held accountable.

The Florida Connection:
The Alliance with Parks, Crump, and Judge Stenise Rolle

34. It was April 2012, when Ademiluyi was drugged and raped at a National Bar Association Conference in Tampa, Florida. Ademiluyi and Jane Doe drugged in the hotel room of Daryl Parks, Esq. (“Parks”) taken out of the room and both raped. John Doe was also drugged around the same time in the hotel room of Parks.

35. Parks and his law partner, Ben Crump, Esq. (“Crump”) both, at that time, were representing the family of Trayvon Martin and receiving significant media attention.

36. Ademiluyi reported that David Phillips, Esq. raped her to the Tampa, FL Police Department, who secretly recorded a phone conversation between David Phillips, Esq. and Ademiluyi. In the call, Phillips admits the best sex for him is with someone too incapacitated to be aware of the sexual contact.

37. The recording was destroyed. A new recording was created where the confession was removed. It was obvious to Ademiluyi that the recording was recreated from start to finish because in the fake recording, Phillips asked Ademiluyi to hold on, and she did so for two full minutes. In the real conversation, Phillips never asked her to hold on. This was just a time filler so the time of the fake recording would match the time of real recording and phone records.

38. Parks and Crump were allies of the then Attorney General of Florida, Pam Bondi, who was a prosecutor in the office that had jurisdiction over Ademiluyi’s rape case for 18 years.

39. Ademiluyi sued the perpetrators, Parks, and Crump in 2015 in Ademiluyi v. National Bar Association, Parks, and Crump case no: 8:16cv02597 JSM-AEP in the Middle

District of Florida but was forced to dismiss the case for among other reasons, the difficulty in finding a fair judge.

40. In Ademiluyi's lawsuit against Parks and Crump, she plead in ¶ 42:

From the fall of 2012, when Plaintiff began pushing, (from Maryland via many emails and phone calls) Ober's office to listen to the recordings, until winter 2013, when she received a copy of the altered version of the recordings, there were an unusual high volume of phone communications between all those who stood to gain from the cover up. Parks and Bondi were repeatedly texting and calling each other. The rapist in other proceedings fought to protect the disclosure of his phone records to plaintiff with the last four digits redacted because he and Parks were in communication during this time period as well. Also, during this time frame, Plaintiff sought the assistance of Senator Joyner (also former NBA president), who unbeknownst to Plaintiff was a close personal friend of Parks and was conveying information to Parks that Plaintiff retained a lawyer who wanted to sue the NBA

41. The timing of Bondi's interactions with Parks suggests that Pam Bondi was involved in tampering with the recordings, but, Bondi was not named as defendant in the lawsuit. The lawsuit did sue Parks and Crump for conspiring with Florida officials to tamper with the evidence.

42. Ademiluyi's lawsuit was initially filed in the U.S. District Court for Maryland, but Judge Hazel, upon motion from the defendants to transfer the case to Florida, transferred the case in September 2016. In the Middle District of Florida, the case was assigned to Judge Jim Moody, where once again Pam Bondi's influence over public officials and timing of her actions raised suspicion of her involvement in corruption.

43. In April 2017, Judge Moody's daughter, Ashley Moody decided to run for Attorney General of Florida, because according to Ashley Moody's campaign website, Pam Bondi encouraged her to do so. On June 29, 2017, Pam Bondi hosted Ashley Moody's first fundraiser that raised a significant amount of money. While Pam Bondi was assisting Judge

Moody's daughter in raising money for her campaign, in July 2017, Judge Moody dismissed the claims in Ademiluyi's lawsuit that pertain to Parks and Crump corruptly influencing public officials to tamper with the recorded confession. [ECF 107] of case 8:16cv02597.

44. Jane Doe warned Ademiluyi that the case was rigged against you because: 1) Pam Bondi got Ashley Moody to resign as a state court judge to run for Florida Attorney General; 2) Bondi offered Ashley Moody financial support to run for Attorney General of Florida; and 3) Judge Moody would do anything to support his daughter's candidacy. Judge Moody even violated judicial ethics and spoke publicly to the Tampa Bay Times about his support for his daughter's campaign.

45. On October 27, 2016, Ademiluyi's attorney, Rebecca Nitkin, in the lawsuit unexpectedly died, without explanation. Ademiluyi could not find another attorney apparently because most feared retaliation if they represented Ademiluyi.

46. Ademiluyi's former attorney, Rebecca Nitkin, was a fearless warrior who stood firm in her fights for justice and upholding the rule of law. She had stepped in to represent Ademiluyi in a fight against a bar association comprising of lawyers and judges, where there are allegations that the male members are offered for sale "any type of sex" from the attorney who drugged and raped her.

47. Plaintiff Ademiluyi lost the 2016 election.

48. After Plaintiff Ademiluyi lost her 2016 election, the judges appointed attorney Stenise Rolle ("Rolle"), as a foreclosure magistrate for Circuit Court for Prince George's. Defendant Adams began planning with Rolle, who worked previously for the Tallahassee, FL law firm of Parks & Crump and had recently relocated from Florida, to formulate a plan to oppose Plaintiff Ademiluyi should she run again for judge. Rolle is a native of Miami, Florida

with no courtroom experience. But she was valuable to the judges because of her ability to create a hostile work environment for Ademiluyi, who they feared would report them to law enforcement, if she came to the bench.

Ademiluyi Campaign Promise to Seek the Assistance of Law Enforcement Was a Threat to the Judges and Their Allies' Plan to Build a Profitable Juvenile Detention Facility.

49. Shortly after Ademiluyi's 2016 campaign, the Judges of the Circuit Court for Prince George's County abruptly ended the mass incarceration of children. But Defendant Adams, around early 2017, began the process of building a lucrative juvenile detention facility for the children that did not require a 24/7 lockdown.

50. As the administrative judge, Adams could hire someone to run the daily activities of the juvenile detention facility, and that person would report to her. Adams, as the agency head, would also have the power to control the awarding of contracts for lucrative business opportunities. For e.g., Thompson Hospitality and its owner Warren Thompson is a contractor that supplies facilities management and food services to the schools and prisons that has a relationship with Brown and Adams. Thompson is a Prince George's County resident. Thompson forms partnerships with Chartwell, Compass Group USA, Canteen, Trinity Services, Thompson Hospitality and Warren Thompson has contributed over 22,000 to Brown's campaigns as Lt Governor, Congress, and Attorney General and he has provided food services to the Prince George's County Courthouse for many years. Most of Thompson and his businesses' political campaign contributions go to Anthony Brown. Other hospitality vendors have publicly complained that it's impossible to compete with Thompson Hospitality for contracts within Prince George's County. Aramark provides the food services for the Prince George's County Detention Center and has done so for many years. Aramark and Thompson Hospitality dominate

the field for providing food to schools and prisons in Maryland. They fiercely compete for the contracts with bid protest if necessary to eliminate each other.

51. The Department of Juvenile Services, apparently at the direction of Brown's office, refused to comply with several of Ademiluyi's public records requests from July 2024 through March 2025 seeking the names of the prime contractors for the Department of Juvenile Services and, instead, gave the names of subcontractors. One notable subcontractor for the Department of Juvenile Services, Mil Ray Foods, subcontracts for both Canteen and Aramark. Mil Ray was providing food services for DJS up until Ademiluyi's 2016 campaign vow to seek the assistance of law enforcement to end corruption.

52. The funding for the lucrative juvenile prison project disappeared immediately after Ademiluyi's successful 2020 campaign. Just few months after Ademiluyi's successful campaign, on April 29, 2021, Adams appeared before the County Council to discuss Circuit Court funding where she said that Former County Executive, Angela Alsobrooks, delayed funding from building the judges' juvenile detention facility for a few years. Alsbrooks controlled a PAC that spent hundreds of thousands of dollars to oppose Ademiluyi's 2020 campaign that was threat to this juvenile prison project. Thompson Hospitality only donated \$4600 to Angela Alsobrooks campaigns, where \$4500 was donated after she delayed funding on the project. In a County Council meeting, former County Council Member, Mel Franklin said County Executive Alsobrooks reasons for delaying the project do not make sense, and he could not understand why there was such an abrupt change in plans.¹

¹ <https://princegeorgescountymd.granicus.com/player/clip/1780> at 1:03:00 to 1:10:00. Last Visited 3/12/25

53. A year later, on April 27, 2022, at the Budget Meeting for the Circuit Court, Adams said that she was not giving up on the lucrative juvenile detention facility. Former County Council Member, Mel Franklin, worked hard on the project and was her biggest supporter, and he said that “even if we have to fund it ourselves” they will find the money to build the juvenile detention facility.² About two years later, Mel Franklin, on August 26, 2024, plead guilty to stealing over \$100,000 from his campaign account and resigned from office. Adams husband, Tim Adams, unsuccessfully ran to fill Franklin's seat. After Adams resigned due to the friction with Ademiluyi vowing not to let go her suspicions of Adams, she withdrew the juvenile prison project. This is the conduct that Ademiluyi's 2016 and 2020 campaigns assured the public that she would seek the assistance of law enforcement to end, and she did.

54. There appeared to be a pattern of Adams using her power for her own benefit and to do financial favors for her friends. Another example is the bail bond licensing fees. The Maryland Seventh Circuit (“Seventh Circuit”) is the only state court jurisdiction that manages bail bondsman licensing. The State manages the licensing for all other jurisdictions.

55. Around February 2022, the judges of the Seventh Circuit voted unanimously to abolish bail bond licensing because the operating cost of managing the licensing exceeded the fees imposed on the bail bondmen to pay for it. Defendant Adams abstained from the vote because it would have benefited her friend, Tommie Broadwater (“Broadwater”, but unilaterally and without informing the judges, Adams issued an order allowing her friend, Broadwater, to

² <https://princegeorgescountymd.granicus.com/player/clip/2363> at 0:20:00 to 0:25:00 Last Visited 3/12/25

operate for one year without paying licensing fees. At the time, Adams' husband, Tim Adams, was running for Maryland comptroller, and Broadwater was publicly campaigning for him. Broadwater had a fraud conviction that may have created hurdles to acquire licensing through the state. Federal law forces the state to impose stricter requirements on those with fraud convictions to acquire a license to sell insurance. Just like the juvenile detention center, managing the bail bondsmen appears to have been nothing more than a front to enrich the Defendant judges and their friends. This is the corruption Ademiluyi promised to report to law enforcement, and she did.

56. In April 2020, during the second campaign, this time in a campaign video and blog on her website that had hundreds of thousands of views on social media, Ademiluyi again told voters her story of Parks and Crump revictimizing her with public corruption after she reported rape. Plaintiff Ademiluyi assured voters she would stand up to any judicial corruption she encountered on the Prince George's County Circuit Court. Adams provided the campaign video and the blog website to the Commission during Ademiluyi's campaign.

57. Defendant Judge Cotton testified in her deposition on February 26, 2024 that she has a relationship with Crump.

58. Ademiluyi garnered more support from liberal political groups such as Progressive Maryland, who believed in her ability to seek the assistance of law enforcement, should she win, to end the corruption on the Prince George's County Circuit Court.

59. Around January 2021, in the first meeting Ademiluyi had with Adams after being sworn into office, she expressed anger over Ademiluyi's campaign to end the corruption behind the mass incarceration of children. Adams told Ademiluyi the judges were no longer locking up children and they were building a school, but it is a prison because the children are on lockdown

while they are in attendance. It appeared to be another venue for judges to receive kickbacks that would not provoke public ridicule because it does not require 24/7 lockdown.

60. There were other instances after Ademiluyi joined the bench where they showed their fear that she would report them to law enforcement:

- A) Pearson tells the Commission and testifies at a public hearing that from day one, the judges feared Ademiluyi would report them to law enforcement. Ex A. “He also recalled that during Judge Ademiluyi’s campaign she *promised to clean house and accused the sitting judges of corruption*” and he did not want to be in a room alone with her. Ex. A;
- B) In August 2021, Judge Sharon Kelsey told Adams and Ademiluyi in a meeting that Judge Kelsey was angry about Ademiluyi’s campaign about ending Dawson’s corruption.

Discovering and reporting the forgery and computer crimes.

61. Shortly after taking the bench, Adams showed her initial hostility towards Ademiluyi in a complaint she made against Ademiluyi to the Commission on Judicial Disabilities. Judge Adams caused the Commission to open investigation CJD2021-042 of Judge Ademiluyi around August 2021, and the Commission dismissed it in January 2022. The complaint alleged Judge Ademiluyi failed to report to work. Judge Ademiluyi, however, was at the courthouse she simply requested to observe a judge in a jury trial who was not hostile towards her. The Judge she was assigned to observe, Sharon Kelsey, openly expressed her anger towards Judge Ademiluyi for her campaign about the mass incarceration of children for a profit, and the day she was assigned to sit with Judge Kelsey, Judge Ademiluyi suspected that she just caused damage to her vehicle in the parking lot.

62. Just weeks before Adams filed a complaint against Ademiluyi, she assigned Ademiluyi the child custody case of *Hawkins v. Lowe* CAD16-07166 where Ademiluyi

experienced public corruption first-hand. Defendant Cotton asked, in violation of Md judicial ethics rules and the Md Constitution, for Ademiluyi to close the case, and Judge Ademiluyi refused. Judge Ademiluyi was concerned about the welfare of children because the father alleged, they were living with a man facing child abuse charges. Plaintiff Ademiluyi refused to close the case so that a social worker could investigate the living arrangements of the children. Judge Cotton, however, was not concerned about the welfare of the children and insisted Judge Ademiluyi close the case.

63. Judge Ademiluyi's electronic signature, without her permission, appeared on an Order while the file was not in her chambers. Properly concerned with how this could have happened, Judge Ademiluyi investigated the circumstances of how her electronic signature could have appeared on an Order that she did not sign.

64. Judge Ademiluyi's attempt to investigate was resisted by Judge Adams. Judge Adams made disparaging, disrespectful remarks, and outright refused to allow the IT Department to assist Judge Ademiluyi to investigate.

65. Among other actions, Judge Ademiluyi contacted the Courthouse IT Department to find out who was accessing her password protected files where she kept her orders. She could not obtain all the information she sought because Judge Adams intervened.

66. Judge Ademiluyi next sought assistance from Prince George's County IT, who informed her that any unauthorized access to her account must be occurring internally. Thus, Ademiluyi next asked for the audit logs to figure out whose computer was logging into her Microsoft Account without her permission. But Prince George's County IT produced logs that omitted most of that information. The audit logs are Excel spreadsheet columns of login details such as the time, location, and name of computer that logs into the Microsoft Account.

Ademiluyi was provided with thousands of login entries. Each computer has a unique identifier associated with it that Microsoft records in the login details.

67. IT produced logs that provided a small number of entries of an identifier of a virtual desktop logging to Ademiluyi's account that did not match the identifier of her virtual desktop. There were no identifiers of a desktop monitor logging into Ademiluyi's account. Ademiluyi rarely uses her virtual monitor but uses her desktop monitor every day. Ademiluyi sent an email requesting the virtual monitor assignments for every computer user in the courthouse. And IT began changing the identifier of her virtual monitor. Thus, making it impossible for Ademiluyi to figure out who was accessing her Microsoft Account.

68. For the Excel column of the name of the computer, the few entries of the identifier of a virtual desktop in the audit logs were mistakenly provided to Ademiluyi. Judge Adams used IT to deceive Ademiluyi. To deceive Ademiluyi, IT intended to omit the name of a computer logging into Ademiluyi's account.

69. Ademiluyi next insisted Prince George's County IT connect her with Microsoft so she can inquire why the audit logs omitted the desktop computers identifiers but contained a few entries of a virtual desktop. Ademiluyi's computer in the audit logs. Judge Adams subsequently directed IT not to assist Judge Ademiluyi any further.

70. IT will only comply with demands, albeit improper and deceitful, from the Administrative Judge or acting Administrative Judge to access another judge's computer without their permission.

71. Ademiluyi knew there was an electronic evidence trail that would show the order was signed without her permission while the file was not in her chambers and likely identify the culprit who filed the counterfeit order. Therefore, Judge Ademiluyi took several steps to cause a

more formal investigation. She complained to the Office of State Prosecutors, which after a thorough review referred her to the Commission on Judicial Disabilities (“Commission”). Similarly, the Office of Fair Practice referred her to the Commission. And finally, the Chief Judge of the Court of Appeals and head of the administration wrote to her that he has no authority to investigate judges and her only option for an investigation was the Commission.

72. Judge Ademiluyi thus provided information to the Commission about her suspicions that Judge Adams and/or another judge (upon information and belief--Judge Cotton) forged Plaintiff Judge Ademiluyi’s signature on an order and were monitoring her emails to sabotage her work product. Investigative Counsel requested that Judge Ademiluyi draft a complaint under oath against both judges, which she did.

73. The Office of State Prosecutor and the FBI work together to investigate the criminal activity of public officials. Around January 2023, Plaintiff Ademiluyi informed the FBI that she believed Adams was forging her signature.

74. Criminal activity that a public official engages in for their personal benefit is a federal crime. The unauthorized access to government computers to deceive a government employee is specifically defined as federal crime under the Computer Fraud and Abuse Act.

75. Each time Plaintiff, Judge Ademiluyi submitted complaints to the FBI, Office of State Prosecutors, and to the Commission she qualified as a whistleblower, engaging in conduct protected by the First Amendment of the United States Constitution.

Plaintiff Ademiluyi Reports Defendants’ Suspected Use of an Imprisoned, Convicted Rapist to Harass and Intimidate Plaintiff Ademiluyi.

76. On or about October 15, 2021, around the same time, Plaintiff Ademiluyi discovered her signature appeared on an order without her permission, she began receiving

harassing letters from an imprisoned convicted rapist. The rapist author of these harassing letter brazenly self identified himself as a former police officer from Miami, Florida, who drugged and raped women whom. he claimed, consented to being drugged. The Department of Justice prosecuted him for these crimes. He was convicted and sentenced to life in prison in 2012, and he is currently serving his sentence in a federal maximum-security prison in Arizona

77. The prisoner, in his letters, postmarked in October 2021, claimed to know a lot of personal information about plaintiff Ademiluyi, including the fact that she had recently won an election to the Circuit Court for Prince George's County. Since federal prisoners have restricted access to the internet and no access to the world wide web, it was clear that someone was providing this inmate with information about Plaintiff and using the rapist as their proxy in a dangerous effort to intimidate and harass Plaintiff from behind prison bars.

78. In October 2021, Plaintiff Ademiluyi immediately reached out to Chief of Security, a special police officer in the Office of the Security Administration in the Administrative Office of Courts, who contacted her local sheriff to inform him of the situation. The Sheriff then contacted Adams, who then scolded Ademiluyi for not contacting her first. Adams told Ademiluyi that she is not supposed to discuss anything with law enforcement without getting her permission to do so. Adams was angry and demanded that Ademiluyi let her see the letters. Ademiluyi refused to show the letters or discuss it any further with Adams.

79. The sheriff informed Ademiluyi that he reached out to the US Penitentiary Tucson, AZ, and they assured him that the inmate would not contact Plaintiff Ademiluyi again. The Sheriff also tried to convince Ademiluyi that she was safe. However, Plaintiff Ademiluyi felt deceived by Adams and the sheriff, much like when she was trying to figure out who was

accessing her computer, but, this occurred before she confronted Adams about forging Plaintiff's signature.

80. Ademiluyi disregarded Adams and the sheriff and reported it to the FBI and Office of State Prosecutor that Ademiluyi suspected one of the judges was using the imprisoned, convicted rapist to send her harassing letters. The Office of State Prosecutor told her only the FBI has jurisdiction.

81. Ademiluyi contacted the US Penitentiary Tucson, AZ to request a formal investigation, The Warden informed her that they were unaware of the situation but they would investigate and provide their findings to law enforcement.

82. Each time Plaintiff Judge Ademiluyi reported the harassment to the FBI, Office of State Prosecutor, Sheriff, and Maryland Judiciary Special Police Officer, she became a whistleblower engaging in conduct protected by the First Amendment of the United States Constitution and 18 U.S.C§ 1513 Retaliating against a witness, victim, or an Informant and its state equivalent Md Criminal Code §9-303.

Adams, Cotton and Pearson Improperly use Investigative Counsel (CJD2022-079)
In Retaliation for Ademiluyi's Complaint to Law Enforcement

83. As a result of Plaintiff Ademiluyi's complaint to the Commission and law enforcement, Judge Adams grew increasingly hostile towards Judge Ademiluyi and retaliated. Just before Judge Adams abruptly resigned rather than face questioning, Judge Adams submitted well over 500 pages to Investigative Counsel, and those documents formed the basis of the CJD-2022-079 ethics case against Judge Ademiluyi. Exhibit F. Most of the conduct at issue in CJD 2022-079 arose *after* Judge Ademiluyi filed her complaint against Judge Adams. At the request of Judge Adams, shortly before she announced her resignation, witnesses were

pressured by her to provide information she could use against Ademiluyi. Because, as the Administrative Judge, Adams has the power to create hostile working conditions for judges, they fear retribution if they decline her request.

84. Adams provided the Commission with Ademiluyi's 2020 campaign video and blog statement on her website during the campaign, but they decided they needed a case to use to frame Ademiluyi as biased.

85. In June of 2022, Judge Ademiluyi was in the process of completing her criminal jury trial training. The 7th Circuit new judge "training" is a tool that Judge Adams and Cotton use to groom judges for participation in their corrupt regime. A senior judge sits next to the judge in training solely to decide the case for them and to give the public the false perception that the judge in training is deciding the case in violation of Maryland judicial ethics rules and the Maryland Constitution. There is no other Circuit in Maryland that trains this way.

86. On or about June 7, 2022, Judge Adams assigned Judge Ademiluyi to sit with Judge Cathy Serrette for her criminal jury trial training in *State v Carlos Lambright*, CT210423X. Judge Cathy Serrette told Judge Ademiluyi she could not rule against the defense attorney, who is also an elected Maryland Delegate, CT Wilson without Judge Adams' permission. Judge Adams's husband, Timothy Adams, was running for Maryland Comptroller, and they needed Delegate CT Wilson's support for their campaign. That need for CT Wilson's support is further evidenced in a campaign donation in February 2022 from Judge Adams's husband to Delegate CT Wilson.

87. Judge Ademiluyi was disgusted and furious with Judges Serrette and Adams. Judge Ademiluyi and Judge Adams had a heated exchange about Judge Adams' corrupt motives in *Lambright* and Judge Adams and Cotton forging her signature in other cases. Judge

Ademiluyi also got into a heated exchange with Judge Serrette regarding how Judge Serrette demanded her to rule.

88. Ademiluyi told Adams in an email that she would not let go of her suspicions that Adams and Cotton forging her signature and gaining unauthorized access to her computer. Ademiluyi said in an email that she hopes the Commission will hold Adams and other judges accountable for forging her signature. Ademiluyi refused to discuss the harassment of the prisoner with Adams, and Adams knew Ademiluyi was complaining to law enforcement about it. Adams was now in fear Ademiluyi was reporting the forgery and computer crimes to law enforcement too.

89. Upon information and belief, a few weeks later, Judge Adams resigned because of Judge Ademiluyi's complaints to the Commission and law enforcement. Adams and her allies in the judiciary, Michelle Hotten, Judge on the Maryland Supreme Court, Lisa Hall Johnson ("Johnson"), a judge and Member of the Commission, Mark Chandlee, a judge and Chairman of the Judicial Inquiry Board, a judge and Chairman of the Commission, Michael Reed were very concerned about Ademiluyi reporting Adams was engaging in criminal activity to law enforcement. Adams has enough power and influence over the Commission for them to simply disregard Ademiluyi's complaint about her and Cotton. Adams and Cotton both made a statement to FOX News in July 2024 that the Commission said they did nothing wrong. The timing suggests that Adams and her allies on the Commission and the Supreme Court thought it was best that she resigns, and they pursue charges against Ademiluyi to frame her as the problem employee and discredit her, so that law enforcement would disregard any complaints Ademiluyi was making to them.

90. By April 6, 2023, Adams also withdrew her lucrative juvenile prison project.

91. Although relevant, the Commission refuses to release the contents of the file that will show what led to Judge Adams' abrupt resignation shortly after Judge Ademiluyi filed her complaint.

92. On or about June 30, 2022, the Commission began investigating Judge Ademiluyi, the whistleblower, in CJD 2022-079 while Judge Ademiluyi's complaint against Judge Adams was pending. Exhibit F Judge Adams requested the investigation of Judge Ademiluyi in response to Judge Ademiluyi's complaint against her.

93. The malice towards Judge Ademiluyi is palpable in the Statement of Charges prepared by Investigative Counsel in CJD 2022-079 based upon information provided by Judges Adams and Cotton. The Statement of Charges alleged among other things that Judge Ademiluyi failed to disclose she was a rape "victim" in *State v Lambricht*, a domestic violence case. It alleged that she is biased against those accused of violence against women, which is untrue and unsupported by any evidence.

94. Even though the resignation and actions of Judge Adams and the actions of Judge Cotton are relevant, the Commission refused to disclose the Reports and Recommendations made for the Complaint Judge Ademiluyi filed against them. Investigative counsel produced a heavily redacted and incomplete file of Judge Ademiluyi's complaints against Judges Adams and Cotton. And Judges Adams and Cotton will not waive confidentiality of their files.

**Adams, Cotton and Pearson Again Improperly Use Investigative Counsel (CJD2023-005)
In Retaliation for Ademiluyi's Complaint to Law Enforcement**

95. When Ademiluyi first took the bench in Prince George's County, Judge Pearson, who was divorced, began to show a personal interest in Ademiluyi. Ademiluyi bluntly rejected his advances causing him to later send her an extremely unprofessional hostile email copying another judge on it.

96. After Pearson subjected Ademiluyi to hostility for rejecting his advances and after Investigative Counsel interviewed Judge Pearson in connection with the CJD 2022-079 case against Ademiluyi, Judge Pearson joined with Judge Cotton to cause a second case to be opened against Ademiluyi, that is CJD 2023-005.

97. As the retaliation against Judge Ademiluyi was ramping up, she reached out via text to Judge Pearson to get his help with the retaliation unknowing that he like many others was a part of Judges Adams and Cotton's CJD 2022-079 retaliation case. Exhibit C, D, F. But Judge Pearson had already made a statement to Investigative Counsel that Judge Ademiluyi was difficult to work with. Judge Pearson declined her invitation for them to get to know each other which caused Judge Ademiluyi to grow suspicious and confront him with whether he was a part of the retaliation plan. Pearson confirmed that he was part of the conspiracy when he told her not to contact him.

98. Judge Cotton became the Administrative Judge for the Circuit Court for Prince George's County on January 1, 2023. Judge Adams' resignation was effective December 31, 2022. Within one month of Judge Cotton starting her administrative judge term, Investigative Counsel started investigating the whistleblower, Judge Ademiluyi in case number CJD 2023-005.

99. Judge Cotton testified in her deposition that Adams told her to file a complaint alleging that Judge Ademiluyi was sending Judge Pearson unwanted messages.

100. In an email on January 3, 2023, Ademiluyi explained to Pearson that she heard from members of the community that Adams was going to destroy her. Pearson forwards the email to Cotton, and Cotton provides this email to Investigative Counsel.

101. On January 21, 2023, in an email (herein after referred to as the “FBI email”), Plaintiff Ademiluyi explained to Pearson that she was drugged and raped at a bar conference in Tampa, Florida, and the newly sworn Judge Stenise Rolle (hereinafter referred to as “Rolle”), formerly a magistrate, use to work for the men involved in tampering with evidence to cover up the drug rape. Ademiluyi explained that someone was using a man convicted of drugging and raping women in Miami, Florida, who was serving a life sentence to send her harassing letters. Ademiluyi told Pearson that she reported it to the federal authorities who were supposed to let her know who was using this prisoner to harass her, and she had not heard anything. Ademiluyi explained the emotional trauma she experienced from the drug rape and how rape affects survivors. Ademiluyi informed Pearson that she was scared.

102. Defendants Cotton and Adams have relationships with Parks and Crump. Rolle had also been elevated to Circuit Court Judge. Parks spoke on Rolle’s behalf at her investiture in January 2023.

103. Phone records show frequent communications between Defendants Pearson, Cotton, and Adams after the January 3rd email that suddenly ceased around the middle of February 2023. The heavy telephone traffic suggests that they were discussing the FBI email. Adams’ suspicion of Ademiluyi talking to the FBI about the judges is now confirmed, and they had to ramp up their efforts to cover up evidence and frustrate Ademiluyi’s to report criminal activity.

104. On April 28, 2023, Ademiluyi confronted Defendant Pearson a judicial conference about ruling on her case, without authority, a week ago. Later that day, Ademiluyi sent Pearson an email confronting him with the notice (and attaching the notice to the email) that Investigative Counsel was investigating her harassing, threatening, and intimidating him and

accusing Pearson and others of causing her distress with the emails Ademiluyi sent to Pearson. Ademiluyi received this notice from Investigative Counsel on or about March 28, 2023. Defendant Pearson responded that he was only cordial to her because witnesses were around. Defendant Pearson forwards these emails to Investigative Counsel on April 28, 2023.

105. Investigative Counsel immediately sent a letter to Ademiluyi stating that the notice of investigation was confidential and that Ademiluyi was not permitted to disclose the letter to anyone under Md Rule 18-407. Investigative Counsel's letter appears to be designed to get Pearson's alliance and reinforce a promise to Pearson that their retaliatory scheme and false allegations would never become public.

106. Investigative Counsel disclosed to Ademiluyi that she had possession of all communications between Defendant Pearson and Plaintiff Ademiluyi that occurred before and after the January 21, 2023 FBI email but did not have the January 21, 2023 FBI email. In Investigative Counsel's summary of Judge Pearson's oral statement to her, she also states that Defendant Pearson discussed with her Plaintiff Ademiluyi 's emails on December 18, 2022, January 3, 2023, January 18, 2023, April 28, 2023, but not the January 21st FBI email.

107. Pearson's suspicious behavior suggested that he withheld the FBI email from investigative counsel to conceal his knowledge of Ademiluyi's reports to law enforcement. For e.g, there is a sudden stop of him using his cell phone to communicate with Cotton and his Assistant, Lesley Holmes whom he frequently communicates with because he thinks the FBI is monitoring his phone calls and he later uses his power as a judge to intimidate Ademiluyi's counsel, Brodsky. Ademiluyi had good faith basis to report to law enforcement Pearson had an intent to violate 18 U.S.C§ 1513 Retaliating against a witness, victim, or an Informant and its state equivalent Md Criminal Code §9-303, and she did so.

108. Judge Pearson's own statements to Investigative Counsel appear to disclose how correct Judge Ademiluyi was about the retaliation scheme. For example, Pearson shockingly alleges he fears Judge Ademiluyi will file a rape complaint against him and that she is trying to get him alone to falsely accuse him of rape when he is the one who first pursued a personal relationship with Judge Ademiluyi. Exhibit A Ademiluyi received a copy of this statement around August 2023.

109. Judge Pearson also told investigative counsel that Judge Ademiluyi is trying to take down the "corrupt" sitting judges and that she is eager to file complaints against men, even questioning her mental state. Exhibit A. Pearson publicly testified consistent with his statement to investigative counsel that reads in pertinent part:

SUMMARY OF ORAL STATEMENT BY JUDGE MICHAEL PEARSON
PURSUANT TO MARYLAND RULES 18-422(b)(2)(B)(i) and 18-433(b)(2)(B).

Investigative Counsel Tanya Bernstein met in person with the Honorable Michael Pearson on January 10, 2023, and spoke with him by telephone on January 20 and April 28, 2023....

On January 10, 2023, Judge Pearson described some issues that he was having with Judge April Ademiluyi. Administrative Judge Daneeka Cotton was also present. Judge Pearson explained that he was part of the training committee when Judge Ademiluyi joined the bench in December 2020. He estimated that he was the least involved with her training and that ... Judge Pearson stated that Judge Ademiluyi came to the bench with a reputation for being litigious and sensitive in her communications with men in particular. He further stated that it was common knowledge that Judge Ademiluyi had filed lawsuits alleging sexual assault at the National Bar Association in Florida. **He also recalled that during Judge Ademiluyi's campaign she promised to clean house and accused the sitting judges of corruption.** He was cautious and did not meet with or talk to Judge Ademiluyi without others present. His staff and others knew about this practice.

...Judge Ademiluyi texted Judge Pearson again on December 20, 2022, and asked him if he wanted to hang out....After consulting with Judge Cotton, Judge Pearson responded to Judge Ademiluyi's text by again directing her not contact him on his cell phone...Judge Pearson expressed concern about Judge Ademiluyi's mental state. Her did not know what "tension" or "beef" that Judge Ademiluyi continually referred to. Judge Pearson further expressed concern that Judge Ademiluyi would try to make claims against him similar to those she made in her previous lawsuits.

Judge Pearson talked with Senior Judge Sheila Tillerson Adams about the January 3, 2023, email. He thought that Judge Ademiluyi was referring to Judge Cotton or Judge Adams in that email.

Judge Pearson subsequently advised that Judge Ademiluyi had made multiple attempts by phone and email on January 18, 2023....

110. Pearson testimony at the public hearing expressed from day one that they were concerned that Ademiluyi was reporting them to law enforcement for taking bribes, and that he was so paranoid about Ademiluyi's complaining about corruption that he could not be in a room alone with her.

111. Similarly, Judge Cotton alleged she has concern for holding a bench meeting because she witnessed whenever Judge Ademiluyi and Judge Pearson interact, Judge Ademiluyi has a triggered emotional response to Judge Pearson. Exhibit B. Ademiluyi received a copy of this statement around July 2023. Cotton publicly testified consistent with her statement to investigative counsel that reads in pertinent part:

SUMMARY OF ORAL STATEMENT BY JUDGE DANEEKA VARNER COTTON PURSUANT TO MARYLAND RULES 18-422(b)(2)(B)(i) and 18-433(b)(2)(B).

Investigative Counsel Tanya Bernstein met in person with the Honorable Daneeka Varner Cotton on January 10, 2023, and spoke with her by telephone on January 18, 2023. Judge Michael Pearson was also present for the meeting on January 10, 2023....

During the meeting on January 10, 2023, Judge Cotton stated she was aware of the issues that Judge Pearson was having with Judge April Ademiluyi. She expressed multiple concerns about Judge Ademiluyi....Judge Cotton also expressed concern about holding a bench meeting in person because it seemed that whenever Judge Ademiluyi saw Judge Pearson it triggered a response from her. Judge Cotton referenced her own experiences with Judge Ademiluyi and questioned whether she was fit for judicial office.

112. Despite their "concern," neither Judge Cotton nor Judge Pearson attempted to discuss their concern with Ademiluyi.

113. The letters from the prisoner caused Ademiluyi severe emotional distress. Pearson and Cotton's statement also caused her severe emotional distress because she feared they were working with Parks, Crump, Rolle and this prisoner to harm her.

114. Defendants, Cotton and Pearson acted in further retaliation for Judge Ademiluyi's complaint to law enforcement that forced Adams's resignation and quickly ran to the Commission to do just that.

115. Defendant Adams escalated the retaliation after Ademiluyi sent the FBI email to Pearson. Adams and her allies (members of the commission and other judges) thought they could pressure Ademiluyi to agree to a three-month suspension with the threat of public charges for CJD2022-079 and CJD2023-005. Mark Chandlee ("Chandlee"), Administrative Judge of Calvert County, reports to Adams and is a strong ally and supporter of Adams and Cotton. Chandlee was also the Chairman of the Commission Inquiry Board—the first step in the process of charging Ademiluyi. Chandlee and Investigative Counsel offered to disregard CJD2023-005 if Ademiluyi would accept discipline that would have eventually led to removing her from office. Adams assigned Ademiluyi and Chandlee to sit on a three-judge sentencing panel on a rape case just before she resigned.

116. In June 2023, in retaliation for Ademiluyi's complaint to the FBI, Reed persuaded the Commission to bring the CJD2022-079 public charges, and he believed that they could pressure Ademiluyi to accept three months discipline and avoid a hearing.

117. Adams chose Larnzell Martin, her close friend to be Ademiluyi's assigned mentor. Martin tried to convince Ademiluyi to accept discipline to show Adams and her allies that she was willing to "take one for the team", and she can be trusted not to talk to law enforcement. Martin told Ademiluyi that everything that occurs in the Commission gets back to

Adams, and there nothing documented that she committed any misconduct. Martin stopped talking to her once she filed a lawsuit exposing that the judges were retaliating for her complaining about suspected criminal activity.

118. On November 15, 2023, the Commission brought ethics charges against Ademiluyi for harassing, threatening, and intimidating Judge Pearson through her communications with him because he alleges Judge Ademiluyi is trying to get him alone to falsely accuse him of rape. The Commission published the charges and Judge Ademiluyi's response to the charges on their website with more than half of Judge Ademiluyi's response redacted, without her consent. The Commission is misleading the public as to Judge Ademiluyi's response to the charges.

119. Anne Albright, Chairman of the Commission and a member of the conspiracy to retaliate, offered to keep the hearing for CJD2023-005 closed from the public to convince Pearson to testify publicly to the narrative they wanted to use to retaliate. But Ademiluyi refused and initiated a federal lawsuit. The federal lawsuit disclosed that Ademiluyi acting in good faith, reported criminal activity of the judges to the Office of State Prosecutor. At the request of Investigative Counsel, the Commission charged Ademiluyi with misconduct for filing a federal lawsuit and retrieved a copy of the complaint Ademiluyi made from the Office of State of Prosecutor.

120. At the public hearing for CJD2023-005, all the witnesses that testified against Ademiluyi were influenced by Defendants AG Brown, Cotton, and Pearson.

AG Brown joins to lead the retaliation for Ademiluyi reporting Adams to law enforcement.

121. In June 2023, when Ademiluyi declined to accept discipline and fight the ethics charges, AG Brown, corruptly used state resources in the hearing process to control the witnesses and protect the judges from incriminating themselves.

122. Brown abused his authority for personal gain when he used the resources of the Attorney General's office to act as a personal criminal defense firm for the conspiracy to retaliate for reporting criminal activity to law enforcement lead by himself, Adams and Cotton.

123. James Spiker ("Spiker"), Assistant Attorney General, at Brown's direction, assisted Adams and Cotton with intimidating and controlling witnesses, who worked for the State, and influencing false testimony. For e.g., Spiker was present at Pearson's deposition, and knew he intended to provide false testimony at the hearing that was inconsistent with his deposition testimony.

124. Brown used Spiker to act as an advocate for the Commission in requesting meetings with witnesses to gather evidence against Judge Ademiluyi. In his email request to witnesses, he does not explain that attendance is voluntary and absent a subpoena the witness cannot be compelled to communicate with Investigative Counsel.

125. Brown, acting for his own personal reasons, aggressively became the leader of the conspiracy to punish Ademiluyi for making a good faith report to law enforcement of criminal activity of the judges, his legislative colleagues, and his campaign donors.

AG Brown, Pearson, Cotton, and Adams shakedown Ademiluyi's counsel and tamper with evidence to retaliate for her reporting to law enforcement

126. On January 8, 2023, Cotton assigned Judge Pearson, the only case pending in the Circuit Court for Prince George's County where Judge Ademiluyi's counsel, Craig Brodsky

Esq., was the lawyer on record. It was a personal injury case scheduled for a settlement conference, in which sitting Judges only preside over if there is no senior/retired judge available.

127. Prior to the filing of the federal lawsuit on December 29, 2023, Defendants Cotton and Pearson's criminal defense attorney, James Spiker, declined multiple requests from Judge Ademiluyi's counsel for a mediation or meeting to resolve the matter amicably with Judge Pearson because Judge Pearson's scorned lover, Judge Cotton, Brown, and Adams would not allow it.

128. Pearson successfully intimidated Brodsky's ability to represent Ademiluyi so much so that Brodsky had to withdraw from the case.

129. Brodsky testified that Pearson stood over Craig Brodsky, Esq. in a doorway and berated him about this federal lawsuit when Mr. Brodsky appeared before Judge Pearson on his personal injury case. Pearson admitted to having conversation about CJD2023-005 while presiding over Brodsky's case.

130. On January 25, 2024, Albright amended the charges against Judge Ademiluyi, alleging Ademiluyi committed sanctionable misconduct by filing this lawsuit.

131. To prevent litigating the issues in this 8:23cv03526, that same day the Albright entered an order prohibiting Judge Ademiluyi from questioning Judges Cotton and Pearson at their depositions on the following topics:

Judge Ademiluyi's allegations about being sexually assaulted in 2012; anything concerning the individuals who allegedly committed the sexual assault in 2012; Judge Ademiluyi's allegations about various judges forging her signature on court orders; Judge Ademiluyi's allegations about various judges improperly monitoring her emails; Judge Ademiluyi's allegations about being a "whistleblower" for wrongdoing within the Circuit Court for Prince George's County; the basis for Judge Sheila R. Tillerson Adams' choice to retire; allegations concerning First Amendment retaliation; the subject matter, causes of action, and/or alleged injuries and damages raised in Judge Ademiluyi's federal lawsuit against Judge Sheila R. Tillerson Adams (Ret.), Judge DaNeeka V.

Cotton, and Judge Michael R. Pearson in the United States District Court for the District of Maryland, Case No. 8:23-cv03526-LKG; and any alleged sanctionable conduct that was charged against Judge Ademiluyi within the four-corners of the Statement of Charges in CJD 2022-079.

132. After the confrontation between Pearson and Brodsky, on January 8, 2024, Brodsky on Ademiluyi's behalf engaged Planet Depos. Ademiluyi hired Planet Depos to provide a court reporter and conference room for the depositions of Pearson and Cotton for the CJD 2023-005 case on February 13, 2024 and February 26, 2024.

133. As part of the contractual relationship, Judge Ademiluyi gave Planet Depos the discretion to select the court reporter for Judge Pearson and Cotton's deposition. Planet Depos selected their independent contractor, Carla Andrews.

134. On the day of Judge Pearson's deposition, Judge Ademiluyi had no reason to believe that anyone would interfere with her relationship with the court reporter.

135. Carla Andrews ("Reporter Andrews") has been a court reporter for 30 years and an independent contractor for Planet Depos for 10 years. Judges Cotton and Adams, both long time judges, run the Prince George's County Circuit Court that regularly employs court reporters.

136. On February 13, 2024, Judge Ademiluyi deposed Pearson. The parties present who identified themselves on the record at the deposition were Judge Ademiluyi and her counsel, Assistant Attorney General James Spiker representing Judges Cotton, Adams, and Pearson and Investigative Counsel Tanya Bernstein, Assistant Investigative Counsel Derek Bayne, and Assistant Investigative Counsel Tamara Dowd.

137. At his deposition, Judge Pearson denied making the oral statements that Investigative Counsel alleged he made to her in her written summary of his statement attached as Exhibit A to the Complaint. Judge Pearson denied the falsehoods in the statement strategically designed to harm Judge Ademiluyi. Judge Pearson testified that he never took issue with nor

discussed with Investigative Counsel any personal text messages Judge Ademiluyi sent him that one might perceive as salacious if the conversation is between male and female. Judge Ademiluyi was trying to line up allies to assist her because she was being retaliated against. Judge Pearson testified that the only reason Investigative Counsel had personal messages between Judge Ademiluyi and him was because Investigative Counsel asked for copies of all communications between him and Judge Ademiluyi.

138. On February 26, 2024, Judge Ademiluyi deposed Judge Cotton, and that same day Planet Depos provided Judge Ademiluyi with a copy of the recording of the deposition.

139. Planet Depos regularly provides a copy of the audio of depositions without the parties making the request when the depositions are recorded with digital reporter software.

140. Although Planet Depos regularly provides copies of audio recordings, Ademiluyi did not receive a copy of a recording for Pearson's deposition.

Fabrication of Evidence

141. On or about February 27, 2024, Judge Ademiluyi received the draft transcript of Judge Pearson's deposition testimony.

142. The transcript of the deposition was fabricated and contained many material inaccuracies. The fabricated transcript created testimony that matches Investigative Counsel's summary of Judge Pearson's statement to her attached as Exhibit A to the Complaint. This was a false narrative to discredit Ademiluyi's rape experience, mischaracterize her as mentally unfit and cause job loss, severe emotional distress, and embarrassment.

143. Reporter Andrews used the internet to transmit the fabricated transcript to Planet Depos and had many email communications with them thereafter misrepresenting the truthfulness of the transcript and the destruction of the recording.

144. On or about March 4, 2024, Judge Ademiluyi requested a copy of the recording of the deposition from Planet Depos and Planet Depos informed Judge Ademiluyi that because the deposition was alleged to have taken with a stenographic machine, it is their policy to push the custody of the recording onto the court reporter. Therefore, they did not have possession of the recording.

145. On or about March 4, 2024, Planet Depos offered to contact Carla Andrews to request that she listen to the recording where the transcript is inaccurate. Judge Ademiluyi requested Andrews listen to the recording on a couple out of the several pages that Judge Ademiluyi knew was fabricated. Planet Depos conveyed that Andrews confirmed the accuracy of those pages.

146. Plaintiff Ademiluyi knew Reporter Andrews was not being truthful and questioned her further through emailing and speaking to an Operations Specialist at Planet Depos.

147. Prior to the start of the deposition, Judge Ademiluyi observed Reporter Andrew's recording setup and inquired from Andrews about how she could get a copy of the recording. Judge Ademiluyi and her counsel sat near Andrews and observed her record the deposition and simultaneously use a laptop throughout the proceedings.

148. Reporter Andrews falsely stated in an affidavit attached to the transcript that the deposition was recorded contemporaneously with a stenographic machine.

149. Plaintiff Ademiluyi brought to the attention of Planet Depos that there was no stenographic machine, and through Planet Depos, Reporter Andrews falsely replied that she used the stenographic machine in her lap. Reporter Andrews did not have any such stenographic

machine in her lap or in the room. Andrews sat at the conference table with her laptop in front of her while she monitored the live feed of the recording from her laptop.

150. Reporter Andrews created a stenographic file after the deposition to give to Planet Depos to create a false appearance that she used the machine at the deposition.

151. On or about March 3, 2024, Plaintiff Ademiluyi requested a copy of the recording from Reporter Andrews through Planet Depos, but Judge Pearson and Investigative Counsel immediately objected via email to Planet Depos releasing the recording.

152. Reporter Andrews breached her oath as stated in her affidavit to not be “employed by any of the parties or have any interest, financial or otherwise, in its outcome.”

Destruction of Evidence

153. On or about March 5, 2024, Ademiluyi tested Andrews truthfulness. In a telephone call, Planet Depos indicated to Ademiluyi Andrews offered to listen to recording to discern whether the transcript was accurate. Ademiluyi identified two pages on the transcript she knew was false, and she asked Andrews to verify if the recording matched those two pages. Andrews listened to the recording and told Ademiluyi the transcript was accurate on those 2 pages. Ademiluyi, knew Andrews was lying, so she then pressed for a copy of the entire recording. Andrews for the first time alleged she created two copies of the recording. But Andrews alleged that one copy was immediately erased, and the other is conveniently inaudible for 3 hours except for the two pages Ademiluyi asked her to verify. Any recording that happens to be partially audible or audible only on the couple pages of the deposition transcript that Ademiluyi asked Andrews to verify is fake.

154. On or about March 5, 2024, Planet Depos immediately secured a copy of the audio recording from Reporter Andrews.

155. On or about March 5, 2024, Planet Depos indicated they were a neutral party and would not release the audio without a court order or agreement from the parties.

156. On or about March, 5, 2024, Pearson and Investigative Counsel actively sought to block the release of the audio recording of the deposition.

157. Planet Depos, in their emails on March 23, 2024, stated to Ademiluyi, that they support taking action that will ensure the integrity of the deposition process. All their depositions are recorded by audio or audio-video means to ensure the accuracy of a transcript. A stenographer must have the option to listen to a recording after the deposition to ensure the accuracy of the transcript. And the stenographer, under judiciary retention policies, must retain the recording.

158. On or about March 13, 2024, Judge Pearson thus solidified his place in the conspiracy to harm Judge Ademiluyi by signing an affidavit endorsing the transcript with no changes.

159. The next day on March 14, 2024 Albright issued an order blocking Judge Ademiluyi from listening to the recording. Ademiluyi asked the members of the Supreme Court (not sitting as court) to give her an order to give to Planet Depos so they will provide her a copy of the recording. Hotten and her colleagues on the Maryland Supreme Court blocked her too.

160. On or about April 9, 2024, after Andrews offered to listen to the transcript, Planet Depos assisted Judge Ademiluyi in investigating the suspicious behavior of her adversaries and found that the recording Andrews provided them with was inaudible, and a transcript could not be prepared or verified from the recording.

161. Cotton and Adams are the only people who could have created the fabricated transcript because these details that could have only been known to Cotton and Adams. For e.g.,

the transcript details that on April 28, 2023, Plaintiff Ademiluyi had a conversation with Pearson about Pearson, without authority, presiding over Plaintiff Ademiluyi's violation of probation case the previous week on April 20, 2024. Cotton and Pearson spoke to Investigative Counsel, on April 28, 2023, about the discussion between Pearson and Plaintiff Ademiluyi. Plaintiff Ademiluyi spoke to Cotton about her conversation with Pearson but did not tell her the name of the case or give much detail about what happened. Cotton or Adams drafted the transcript to say that Pearson was presiding over the case because: it was his assigned case that the courtroom clerk called him to take and Plaintiff Ademiluyi had only presided over the case while she was training. This was also Investigative Counsel's summary of Pearson's statement to her. But the violation of probation case was never assigned to Pearson nor was it assigned to Plaintiff Ademiluyi while training.

162. On April 28, 2024, When Ademiluyi confronted Pearson for taking her case, State v. Clarence Lewis Bryant CT180150X, he apologized for doing so. In that case, on or about March 27, 2023, defendant's lawyer filed a motion to release his client from jail, and in that motion, he stated that he found a prosecutor who agreed that his client should be released. This was not the prosecutor assigned to the case. Ademiluyi set the motion in for a hearing on April 20, 2023 with the prosecutor assigned to the case.

163. On the day of the hearing, the defendant's lawyer, John McKenna, had to appear in front of Pearson on another case. Ademiluyi, the prosecutor assigned to the case, and the courtroom clerk waited in the courtroom for over 30 minutes for the defendant's lawyer. The defendant's lawyer was in Pearson's courtroom waiting for another case to be heard. The defendant's lawyer brought the prosecutor to Pearson's courtroom, who was not assigned to the case and agreed with the outcome he wanted to Pearson's courtroom. Pearson sent the prosecutor

who appeared in his courtroom to Ademiluyi's courtroom to let them know he ruled on her case. The law partner to this attorney, William Brennan, represented Pearson in the suit Ademiluyi filed against Reporter Andrews in DC Superior Court. Pearson attempted to cover up Adams or his secret lover's mistake and change this testimony at the public hearing to avoid impeachment.

164. Adams tried to create the narrative to the Commission that because Ademiluyi was training that she had no authority to rule on cases that she was presiding over because those cases were assigned to other judges. Although Ademiluyi was addressing the courtroom in these cases and signing the orders, under Adams corrupt reign, Ademiluyi had no authority to rule on the cases.

165. The relevant portion of the deposition states in pertinent part:

Q. And what were the circumstances under which you came to take the case -- take the case, Your Honor?

A. I have very vague recollection, but I was on the bench dealing with other matters. I got a phone call to my clerk that's in the -- the courtroom clerk. And the message I got from her was calendar management or the clerk's office wants to know if you would be willing to handle a case in which you were supervising Judge Ademiluyi at the time of the plea. And I said, "Well, if I was the supervising judge, that means that I am supposed to take it."

Page 124 line17--125 line 7

166. The relevant portion of Judge Pearson's statement to Investigative Counsel that he acknowledged when he publicly testified reads in pertinent part:

.....On April 28, 2023, Judge Pearson advised that Judge Ademiluyi approached Judge Pearson at the judicial conference to ask why he took a case from her. Judge Pearson explained he received a call while he was in court asking him to take a VOP case that had his name on it, so he did. Judge Ademiluyi had handled the case during his training with Judge Pearson so they both had to sign the order. ...Judge Pearson thought the matter was closed following their discussion, but Judge Ademiluyi subsequently emailed him about it....

167. At the conclusion of Investigative Counsel's investigation, she produced a statement summary purportedly given by Pearson; however, the substance of the summarized statement was provided to Investigative Counsel by either Adams or Cotton.

168. Albright, through her orders and rulings at the hearing, prevented Plaintiff Ademiluyi from asking Pearson or any other witness questions about statements they provided to Investigative Counsel both during depositions and at the public proceedings.

**Judge Ademiluyi is removed from the bench
in retaliation for reporting to law enforcement.**

169. Ademiluyi commenced the first case 8:23cv3526 on December 29, 2023, a federal lawsuit against Adams, Cotton, and Pearson for their retaliation for Ademiluyi reporting to law enforcement. Ademiluyi pleads in that lawsuit that she has a good faith basis to complain to law enforcement about Adams and Cotton engaging in criminal activity.

170. Albright argued to this Court in her filing in the first federal lawsuit not to allow pleadings that detail corruption because it will bring the state judiciary in disrepute. The State judiciary does not want exposure of criminal activity of judges. The Commission, controlled by judges, aims to enforce that policy. They expect the federal judiciary and this court to fall in line with their policies that are against the public interest and protect them too.

171. Prince George's County is rampant with corruption at every level of government. The DOJ has successfully prosecuted many corruption cases in the Prince George's County executive branch and the legislative branch but never in the judicial branch.

172. The state judges do not report misconduct of other judges because of the culture of reprisal. One judge, Devi Russell, who reported the misconduct (not criminal activity) of another judge Katie O'Malley in Baltimore City was publicly retaliated against in the same

manner as Ademiluyi with the hostile, voluminous discriminatory Commission proceedings where many witnesses provided false testimony.

173. Ademiluyi was a huge threat to the Prince George's County judiciary because she was an inside credible tip to law enforcement of criminal activity from judges that the state judiciary has never had to deal with it. Ademiluyi turned out to be exactly what her campaign said she would be. During her tenure, Ademiluyi made good faith numerous tips to law enforcement about the judges engaging in criminal activity.

174. On or about January 3, 2024, Johnson made the request to the Judiciary to place Ademiluyi on administrative leave after Ademiluyi commenced federal lawsuit 8:23cv03256.

175. On January 3, 2024, the Supreme Court of Maryland (not acting as a Court but as an agency policing itself) immediately placed Judge Ademiluyi on administrative leave with pay upon their receipt of a letter from the Commission enclosing a copy of the lawsuit, opining that administrative leave was necessary "to maintain public confidence in the judiciary" and "ensuring the continuing orderly administration of justice" in light of the federal lawsuit.

176. At the same time Judge Ademiluyi filed the first federal lawsuit 8:23cv03526 to adjudicate her First Amendment rights, she sought three months medical leave to accommodate the stress caused by the retaliation.

177. On or about January 3, 2024, Johnson made the request to the Judiciary to place Ademiluyi on administrative leave after she commenced the federal lawsuit 8:23cv03256.

178. From September to December 2023, the Commission subjected her to hostile, high volume, fast paced litigation that she could not adequately participate in or defend and simultaneously perform her judicial duties. Up until she requested leave, Judge Ademiluyi prioritized her judicial duties and did so as the rules require.

179. The Commission showed their intent to cover up evidence that could prove criminal activity of Adams and Cotton, and frame Ademiluyi as the problem employee at the public hearing. For e.g., Investigative Counsel, instructed Adams read out loud the heated email exchange between Ademiluyi and Adams over the *Lambright* case when Ademiluyi refused to allow Adams corrupt motives to control her rulings. Adams selectively read to the public the portion of the email where Ademiluyi wrote that she refused to participate any further in the training. But did not read the part where Ademiluyi said she was refusing to participate in the training because they were asking her to do something corrupt, and she said she hoped the Commission would hold all the judges who were forging her signature accountable. Adams disregarded words as she was reading sentences verbatim in Ademiluyi's email to create a false narrative of Ademiluyi being insubordinate to a lawful request from her. At the end of her testimony, Adams thanked the Commission for their role in protecting her from incriminating herself.

180. In further retaliation, the Commission used Ademiluyi's request for sick leave to justify initiating another action against Ademiluyi seeking a mental health examination. Investigative Counsel initiated a third matter, CJD2024-007, into Judge Ademiluyi's mental fitness solely based on her statements that she was suffering from stress from the retaliation and needs time off to recuperate.

181. On March 22, 2024, Judge Ademiluyi provided Investigative Counsel with documentation that she has received adequate treatment and is ready and fit to return to her duties.

182. But Investigative Counsel seeks Ademiluyi's medical records and to compel Ademiluyi to undergo a mental health examination with a doctor of her choosing.

183. The Commission concluded two days of the 2023-005 hearing on April 29 and May 2, 2024, with one day remaining on May 10, 2024. At the hearing, Judge Ademiluyi was prohibited from presenting evidence and questioning witnesses on any of the topics in the protective order.

184. On May 6, 2024, the Supreme Court of Maryland (not acting as a Court but an agency policing itself) accepted the Commission's findings of facts in the CJD 2022-079 case. Ignoring the Commission's recommended sanctions, the Maryland Supreme Court (not sitting as a Court but an agency policing itself) summarily removed Judge Ademiluyi as a Judge on the Circuit Court for Prince George's County.

185. Defendant Judge Adams had allies at every step of the process in charging Ademiluyi with misconduct and removing her from the office. The process of disciplining a judge is very informal. Defendant Adams was regularly communicating with the following who were motivated to retaliate and who assisted Adams in retaliating:

- a. Mark Chandlee, Chairman of the Inquiry Board, , ;
- b. Michael Reed ("Reed") Chairman of the Commission until the 2022-079 public charges; and,
- c. Michelle Hotten, member of the Supreme Court (not sitting as a court but as an agency).

186. All of the above were strong allies that engaged in regular communications with Adams.

187. Anne Albright replaced Reed as Chairman of the Commission after Ademiluyi refused to accept discipline, but Albright continued to carry out the retaliatory scheme that Reed had initiated.

188. On May 7, 2024, the Commission stayed CJD 2023-005.

189. In August 2024, the Maryland Supreme Court (not sitting as a court) but as the Maryland Judiciary, an agency, issued their reasons that were pretextual and blatant retaliation against Plaintiff for complaining to law enforcement about Adams and Cotton's corruption and harassing her. Hotten, close to Judge Herman Dawson as well, will fight to the ends of the earth to protect Dawson and Adams. Hotten and the other members focused heavily on framing Ademiluyi as biased in the rape case of *State v. Carlos Lambright*, because she complained and spoke publicly (in a campaign video and blog statement on her website) about the corruption she experienced at the hands of Pam Bondi, then Attorney General of Florida when she reported being drugged and raped and vowed to stand up to corruption. They even went so far to conclude that she was biased against police and prosecutors. Ademiluyi had presided over many rape cases in the family and criminal division before *State v. Carlos Lambright*. Hotten successfully got her colleagues to frame Ademiluyi as the biased, problem judge who refused to train, to cover up Adams corruption on the *Lambright* case and discredit Plaintiff Ademiluyi's complaints to law enforcement.

Johnson and Adams' allies in the judiciary escalate their retaliation for Ademiluyi reporting to law enforcement

190. Johnson, in her ethics course for training the new judges, corrupts the course. Johnson is more concerned with judges being trained to embrace and accept a corrupt culture than serve the public.

191. In November 2024, Tanya Bernstein ("Bernstein"), Investigative Counsel, began sending harassing letters to Ademiluyi that disclosure of Cotton and Pearson's statements on her social media website violates her application of Md. Rule 18-407. 183. On January 14, 2025, Johnson filed a complaint on behalf of Bernstein, Adams, Cotton, and Pearson with the Attorney

Grievance Commission that Ademiluyi's disclosure of Cotton and Pearson's statements on her social media website violates Md. 184. Rule 18-407 and this Court's order sealing the exhibits in 8:23cv03256. Johnson further attached a summary of this lawsuit that Ademiluyi posted on the blog of her website to her complaint to the Attorney Grievance Commission alleging that the contents of Ademiluyi's blog post and lawsuit are not true.

192. In August 2024, after Ademiluyi sued Reporter Andrews, fake profiles on social media immediately began sending harassing messages and attempting to communicate with her. These harassing social media profiles are obviously fake because all contain the same pictures of a nude woman or well-known military figures. Those fake profiles between December 2024 and Johnson's filing a complaint with the Attorney Grievance Commission against Ademiluyi have become increasingly threatening. One fake profile was that a picture of a man who resembled Defendant Pearson flexing his muscles. One of the fake profiles pictured a man posting a sign that warns: "a wise woman once said fuck this shit and she lived happily ever after."

193. The continuing efforts of any Maryland state court judge to indoctrinate fellow judges to a rule of silence corrupts and rots the state's justice system. For the safety of our community and our judicial system, any restrictions on citizen rights to seek the assistance of law enforcement and publicly complain about corruption must be respected, enforced and cherished. It is not about wisdom—it is about justice.

CLAIMS AGAINST ALL DEFENDANTS

COUNT I TORTIOUS INTERFERENCE WITH A CONTRACT

(Defendants, Andrews, Adams, Cotton, Pearson, and Brown)

194. Plaintiff realleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

Motives For Evidence Tampering

195. Johnson's complaint to the Attorney Grievance Commission exemplifies the judges' attempt to deceive the public and law enforcement about whether Pearson, Cotton, and Adams are engaging in criminal activity.

196. Defendants Brown, Cotton, and Adams' plan to use Pearson was extreme and outrageous, and built on all lies. From 2016 to 2020, among Prince George's County residents, Plaintiff Ademiluyi publicly spoke about her experience of being drugged and raped by lawyers in 2012. When she sought accountability, her efforts were stymied by public corruption. Brown, Cotton, and Adams sought to use Judge Pearson to discredit and torment Judge Ademiluyi about that experience in retaliation for the public corruption complaints she made against them to the FBI. Exhibit A-B.

197. Defendants Brown, Cotton and Adams wielded major influence over Judge Pearson.

198. Defendant Adams mentored and had administrative authority over Judge Pearson for 12 years. And most in the courthouse feared going against Judge Adams.

Cotton's Romantic Affair with Pearson Muddies the Waters

199. For a period before Ademiluyi received Pearson and Cotton's statements to investigative counsel, Cotton made it seem like she feared Ademiluyi would interfere with her romantic affair with Pearson. After Ademiluyi asked Pearson for his help, Pearson would not speak to Ademiluyi, and she had no idea what the problem was. Judge Cotton knew that Judge Pearson had a romantic interest in Judge Ademiluyi. Prior to Judge Cotton causing the opening

of CJD2023-005 investigation, Judge Ademiluyi did not know, or suspect Judge Pearson had any sexual interest in Judge Cotton.

200. In February 2023, Judge Ademiluyi received notice that Investigation was investigating CJD2023-005. Judge Cotton made her sexual interest in Judge Pearson clear to Judge Ademiluyi and emphasized numerous times that Judge Pearson had not caused the opening of CJD 2023-005 investigation.

201. Defendant Pearson and Cotton were in a romantic relationship that they maintained in secrecy. Judge Cotton is married to Joseph Cotton, an attorney, who is well known among the judges in the Prince George's County judiciary, including Judge Pearson. The steamy affair between Judges Pearson and Cotton went on for years. Phone records show that these two could not get enough of each other all day at work, after work, and all night.

202. Their heavy, consistent cell communications ongoing for years that confirms their romantic affair, suddenly ceased a couple months after Judge Cotton caused the CJD 2023-005 investigation. Judge Pearson also has the same phone patterns with his assistant, Lesley Holmes, as he has with Judge Cotton and his cellular phone communications with them cease at the same time. Judge Pearson and his assistant, Ms. Holmes, also deny the existence of a romantic relationship. There is long history of phone records on his inappropriate relationships that cannot be erased. The sudden end of cellular communication after Ademiluyi informs him she is talking to the FBI suggests that Judge Pearson feared law enforcement was monitoring his calls.

203. Cotton and Adams initially succeeded in getting Judge Pearson to play the role to help them get revenge and causing the CJD2023-005 charges. Phone records confirm communications between Judge Pearson and Adams just before Judge Pearson and Cotton's first meeting with Investigative Counsel.

204. Defendant Cotton told the Commission she wanted revenge for the complaints Ademiluyi filed, and she was relentless in her pursuit. Exhibit E.

205. The plot was to revictimize Ademiluyi and cause severe emotional distress because this is the corruption she experienced when she reported rape, so Pearson played a role in pretending as though he did not want to participate.

206. To bring Defendant Pearson's deposition testimony in line with Judges Cotton and Adams as well as all their statements given to Investigative Counsel, they had to fabricate the transcript.

207. In April 2023, Plaintiff Ademiluyi saw a flirtatious interaction between Judges Cotton and Pearson in front of Judge Lawrence Hill. In two meetings between February and May 2023, before and after seeing the flirtatious interaction between Judges Cotton and Pearson, Judge Ademiluyi told Judge Cotton she had no sexual interest in Judge Pearson and sought only an amicable professional relationship, but this was insufficient for Judge Cotton. Judge Cotton insisted that Plaintiff Ademiluyi and Defendant Pearson would never speak again and that they must communicate only in writing.

208. On other subsequent interactions, Judge Defendant Cotton demonstrated jealousy over Ademiluyi's physical appearance, for e.g., commenting on her disgust at Plaintiff Ademiluyi's body being so physically fit. Ademiluyi is athletic, whereas Cotton is a much older plus-size woman. Defendant Cotton often made Judge Ademiluyi very feel uncomfortable with her jealous remarks about Plaintiff Ademiluyi's physical appearance. To alleviate her fears that Plaintiff Ademiluyi might diminish Defendant Pearson's sexual interest in her, Defendant Cotton demanded assurance that Judges Ademiluyi and Pearson would never see each other again.

209. Defendant Cotton's deposition testimony revealed her sexual interest in Defendant Pearson. Judge Cotton demonstrated anger and jealousy over the text message invitation Judge Ademiluyi sent to Defendant Pearson inviting him to spend time with her so she can get his help with overcoming the retaliation. For e.g., Plaintiff Ademiluyi's text to Defendant Pearson that they need to work out their tension; he can call her anytime; and she is always up late understandably upset his scorned lover, Defendant Cotton, because their phone records show voluminous communications between them all hours of the night. But Judge Cotton, clearly being untruthful, denied having a romantic affair with Judge Pearson.

210. Defendant Pearson, in his deposition, also being untruthful, denied having a romantic affair with Judge Cotton.

211. Defendant Cotton is dangerously obsessed with keeping her clandestine romantic affair with Pearson.

212. Joseph Cotton is telling members of the community that his wife, Judge Cotton, will "destroy" Ademiluyi. Exhibit A.

213. Cotton, Adams, Brown, Pearson, and others conspired with Andrews to make false, material changes to Judge Pearson's deposition transcript to harm Ademiluyi.

Adams and Cotton's conspiracy with Rolle, Parks and Crump influenced Pearson

214. Adams was so obsessed with revenge and calming her fears of Ademiluyi reporting her to law enforcement that she too got Pearson to play the role in the deposition that he wanted to get out of the false narrative, so he could later change his deposition testimony.

215. Parks, Crump, and Rolle were working with Adams, Cotton and Pearson to punish Ademiluyi for reporting and speaking out publicly about the drug rape and that Parks and

Crump bribed former prosecutor Pamela Bondi to destroy the recorded confession of the drug rape.

216. On two occasions, after Ademiluyi sent Pearson the January 21, 2023 FBI email, at meetings, Pearson went out his way to embrace Rolle in front of Ademiluyi to demonstrate to Ademiluyi that he was working with the conspiracy to harm her.

217. Parks and Crump are involved in a pattern of tampering with recordings of testimony to harm Ademiluyi to cover up criminal activity and retaliate for reporting criminal activity.

218. Prior to Defendant Pearson's deposition, Reporter Andrews had a working relationship directly or indirectly with Adams and Cotton. Unbeknownst to Judge Ademiluyi and her counsel, Brown, Cotton, and others selected Reporter Andrews to be the court reporter that Planet Depos used for Judge Pearson's deposition to fabricate Pearson's deposition testimony.

219. Planet Depos is a widely known and used deposition company in the Washington DC Metropolitan area. There about a handful of deposition companies that offer office space to take in person depositions in Prince George's County. Andrews and Planet Depos performed work for the House Ethics Committee that Brown served on his entire tenure in the U.S. Congress. There is a working relationship between Brown and Andrews.

220. Defendant Cotton, as the Administrative Judge, can use her authority and return the corrupt favor Reporter Andrews gave her in this case by hiring Reporter Andrews at any time to perform work at the Circuit Court for Prince George's County and pay her a generous compensation. Reporter Andrews is currently seeking better job opportunities.

The Impact of Evidence Tampering

221. Judge Pearson, who initially was trying to get himself out of some of the lies orchestrated to harm Judge Ademiluyi changed his mind. The fabricated transcript and his testimony at the public hearing was the opposite of his deposition testimony. Pearson testified publicly that he filed a complaint against Plaintiff Ademiluyi because she was sending him salacious text messages and he wanted her to leave him alone. Pearson had to go to great lengths to cover up the jealousy of his scorned lover, also lying that he filed the complaint against Plaintiff Ademiluyi. This was consistent with the statement Pearson allegedly gave to Investigative Counsel and what Cotton wanted him to say.

222. Investigative Counsel, despite their knowledge that Pearson's deposition transcript had been altered, called Judge Pearson to provide false testimony.

223. Investigative Counsel and Albright enforced the judiciary's official policy and custom of retaliation. Investigative Counsel was retaliating against Judge Ademiluyi for her public corruption complaints and this federal lawsuit against her colleagues that pleads dishonesty of the Commission and having a good faith basis to report criminal activity to law enforcement. Investigative Counsel even went so far to obtain copies of the complaint Ademiluyi made to the Office of State Prosecutor that Ademiluyi. At Investigative Counsel's request, Albright, also retaliating, prohibited Judge Ademiluyi from putting on a case in CJD 2023-005 and impeaching Judge Pearson at the public hearing.

224. Reporter Andrews, acting with malice, interfered with the contract between Plaintiff Ademiluyi and Planet Depos by assisting her coconspirators in producing a fabricated deposition transcript and destroying the audio recording of the deposition.

225. Reporter Andrews, Brown, Adams, Cotton, and Pearson caused Planet Depos to breach their contractual obligation to provide honest court reporting services at a deposition.

226. Reporter Andrews, Brown, Adams, Cotton and Pearson actions suggest an intent to violate numerous federal and state criminal statutes. There is ample evidence supporting Pearson's intent to violate 18 U.S.C§ 1513 Retaliating against a witness, victim, or an Informant and its state equivalent Md Criminal Code §9-303 and other statutes, i.e. hiding the FBI email; suddenly ceasing cell phone communications with Cotton and his assistant; intimidating Ademiluyi's counsel; and participating in changing this testimony.

227. Reporter Andrew's dishonest, corrupt court reporting services helped her coconspirators succeed in their plans to viciously attack Judge Ademiluyi. They revictimized her, attempted to discredit her rape experience, asserted mental instability, and inflicted severe emotional distress.

228. Reporter Andrews, Judges Cotton and Pearson's malicious interference with Judge Ademiluyi's contract with Planet Depos caused Judge Ademiluyi to experience reputational harm, anxiety, depression, emotional distress, attorney fees, and costs.

229. Planet Depos charged Plaintiff Ademiluyi \$826.05 for Pearson's deposition and a higher amount for Cotton's deposition, which Plaintiff Ademiluyi had no insurance to cover.

230. On August 26, 2024, Defendant Pearson and his secret lover who is also his assistant, Ms. Holmes, used Monet Hurley, Plaintiff Ademiluyi's former courtroom clerk to reach out to Plaintiff Ademiluyi to deceive her into providing information that Ms. Hurley can give to Ms. Holmes and Judge Pearson to harm Plaintiff Ademiluyi. Ms. Holmes and Ms. Hurley have a friendship, they are hiding from Plaintiff Ademiluyi. Plaintiff Ademiluyi did not communicate with Ms. Hurley. Judge Pearson knew of the lawsuit against Reporter Andrews that had neither his nor Judge Cotton's name on it before Plaintiff Ademiluyi gave Judges Cotton and Pearson and anyone other than Reporter Andrews notice of the lawsuit.

WHEREFORE, Plaintiff Ademiluyi prays this Court awards: a) Compensatory damages in excess of \$75,000; (b) Punitive damages in an amount to be determined at trial; (c) Attorney fees; (d) Costs to include cost of the deposition; and (e) any such other and further relief as the Court deems just and proper.

COUNT II INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Defendants, Andrews, Adams, Cotton, Pearson, and Brown)

231. Plaintiff realleges and incorporates by reference the preceding paragraphs as if fully set forth herein.
232. Reporter Andrews, Judge Cotton, and Judge Pearson, Brown, and Adams conspired to intentionally inflict severe emotional distress on Judge Ademiluyi through making, endorsing, or using the fabricated deposition transcript.
233. The conspiracy of Brown, Adams, Cotton, and Pearson, Reporter Andrews, and others formed to cause Judge Ademiluyi severe emotional distress and job loss was extreme and outrageous.
234. Reporter Andrews, a corrupt court reporter, who conspired with Judge Cotton, and others to alter Judge Pearson's testimony, then lied about it and destroyed the recording of the deposition engaged in extreme and outrageous conduct.
235. Judge Ademiluyi had just completed treatment from a mental health provider for anxiety and stress caused by the retaliation. The manipulation of Judge Pearson's deposition testimony worsened Judge Ademiluyi's condition causing her to suffer severe emotional distress. For months after Pearson testified at the public hearing, Ademiluyi experienced severe depression and anxiety such as crying spells, inability to sleep, eat,

and engage in other normal daily activities. To date, she still experiences relapses of these same symptoms that interfere with her ability to work.

WHEREFORE, Plaintiff Ademiluyi prays this Court awards: a) Compensatory damages in excess of \$75,000; (b) Punitive damages; (c) Attorney fees; (d) Costs including the cost of the deposition; and (e) any such other and further relief as the Court deems just and proper.

**CLAIM AGAINST THE JUDGES AND ATTORNEY GENERAL IN
THEIR INDIVIDUAL CAPACITY**

**COUNT III
FIRST AMENDMENT RETALIATION
FOR REPORTING TO LAW ENFORCEMENT
(Defendants: Brown, Judges Adams, Cotton, and Pearson)
42U.S.C. § 1983**

236. Plaintiff, Ademiluyi, incorporates the allegations in the preceding paragraphs.

237. Pearson's statement to investigative counsel and testimony at the public hearing shows because of Ademiluyi's campaign speech from day one that himself, Brown, Adams Cotton and other members of the judiciary were concerned that she was reporting the judges to law enforcement for corruption.

238. Reporting criminal activity of judges is clearly a matter of public concern.

239. During her tenure, Ademiluyi had a good faith basis to believe and did report to the FBI and Office of State Prosecutor that the defendants engaged in the following state and federal criminal activity:

- A) conspiring with an imprisoned convicted rapist to harass Ademiluyi because she is a survivor of rape;
- B) improperly accessing Ademiluyi's emails and forging her signature;

- C) receiving kickbacks from a contractor for a juvenile detention facility to incarcerate children;
- D) building a juvenile detention center for personal profit; and
- E) corruptly influencing a court reporter to tamper with a deposition transcript.
- F) waiving licensing fees for a bail bondsman and personal ally, who had a federal fraud conviction and was unable to seeking licensing through the state.
- G) Retaliating against Ademiluyi for reporting the judges to law enforcement

240. The First Amendment of the U.S. Constitution prohibits retaliation against public officials like Ademiluyi for exercising their right to seek redress of grievances by the filing of complaints with government agencies. In other words, Ademiluyi's good faith complaints to law enforcement about the judges victimizing her through improperly accessing her emails, forging her signature, and using a federal prisoner to harass her and taking or soliciting bribes constituted protected communications.

241. As set forth herein, the Defendants Adams, Pearson and Cotton retaliated against Ademiluyi for making her complaints to law enforcement by:

- A) mischaracterizing Ademiluyi's performance and character for the purpose of causing charges to be initiated and pursuing the CJD 2022-079;
- B) initiating and pursuing CJD 2023-005 alleging sanctionable misconduct against Ademiluyi for: A) trying to get Pearson alone to false accuse him of rape on the basis of a text message and emails between Ademiluyi and Pearson where Ademiluyi is asking for Pearson's help and expressing her fear of Adams and Cotton's plans to retaliate B) and an email to Pearson where Ademiluyi tells Pearson that she is complaining to the FBI

about someone using an imprisoned convicted rapist to harass Ademiluyi about her experience of reporting being drugged and raped.

C) Pearson, Cotton, and Adams conspired with the Commission to use the threat of the public charges of CJD2023-005 and CJD2022-079 to force and intimidate Ademiluyi into accepting discipline.

242. As set forth herein, the Defendants Brown, Pearson, Adams, and Cotton retaliated against Ademiluyi for her making her complaints by corruptly influencing a court reporter to make material changes to Pearson's deposition testimony to cause her to experience and be revictimized by the same corruption she experienced when she reported being drugged and raped.

243. As set forth herein, Defendant Brown lead the retaliatory scheme by acting outside the scope of his authority vested by the Maryland Constitution and his duty to represent the people of Maryland by protecting Adams, Cotton, and Pearson from incriminating themselves; interfering with Ademiluyi's employment; and influencing false testimony.

244. The actions of Judges Adams, Pearson and Cotton and Brown were taken under color of state law judicial in nature and therefore the Defendants are not entitled to absolute judicial immunity.

245. The actions of Judges Adams, Pearson and Cotton and Brown were taken under color of state law and not administrative in nature.

246. At the time of the actions of the Defendants, it was clearly established law that the First Amendment and 18 U.S.C. § 1513 prohibits retaliation for reporting federal crimes. 18 U.S.C § 1513 states in pertinent part,

(e) Whoever knowingly, with the intent to retaliate, takes any action harmful to any person, including *interference with the lawful employment*

or livelihood of any person, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any Federal offense, shall be fined under this title or imprisoned not more than 10 years, or both.

Therefore, the Defendants are not entitled to judicial or qualified immunity.

WHEREFORE, Plaintiff demands declaratory relief that CJD 2022-079, CJD 2024-007 and CJD 2023-005 are unconstitutional and judgment against the Defendants, jointly and severally, for compensatory and punitive damages, for reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1983, interest and such other relief as the Court deems just and proper.

COUNT IV

(Ultra Vires – Unlawful Prior Restraint) **(Defendants: Brown, Judges Adams, Cotton, and Pearson)**

247. Plaintiff, Ademiluyi, incorporates the allegations in the preceding paragraphs.

248. The Attorney Grievance Commission wrote that they would defer Johnson's complaint until litigation ceases because they are unsure how to evaluate it.

249. Bernstein, Adams, Cotton, Pearson, Brown, and Johnson's (hereinafter named "the cover up conspiracy") application of the confidentiality clause of Md Rule 18-407 to Judge Ademiluyi's cases violates the First Amendment.

250. The cover up conspiracy seeks to seal all witness statements created during the investigation of Judge Ademiluyi and Judge Ademiluyi's complaints against Judges Adams and Cotton that are exculpatory to Judge Ademiluyi but inculpatory to Judges, Adams, Pearson, and Cotton.

251. The rule on its face does not bar the disclosure of witness statements or exculpatory materials by the subject judge.

252. The relevant portion of 18-407 reads:

(a)(4) Work Product, Proceedings, and Deliberations. Except to the extent admitted into evidence before the Commission, the following matters shall be confidential: (A) Investigative Counsel's work product and, subject to Rules 18422(b)(3)(A), 18-424(d)(3) and 18-433(c), reports prepared by Investigative Counsel not submitted to the Commission; (B) proceedings before the Board, including any peer review proceeding; (C) any materials reviewed by the Board during its proceedings that were not submitted to the Commission; (D) deliberations of the Board and Commission; and (E) records of the Board's and Commission's deliberations. ...

(b) Permitted Release of Information by Commission—

(1) Written Waiver. The Commission may release confidential information upon receipt of a written waiver by the subject judge, except that those matters listed in subsection (a)(4) of this Rule shall remain confidential notwithstanding a waiver by the judge.

253. Judge Ademiluyi controls what can be released publicly. Md. Rule 18-407(b)(1) applies to the Commission, not Judge Ademiluyi. *Compare* Md. Rule 18-407 and Md. Rule 19-707 which by its plain language is much broader and applies to the respondent attorney and Bar Counsel. As stated in *In re White*, 458 Md. 60, 84 (2018), the reason for confidentiality is to protect the judge who is the subject of the proceeding, not anyone else.

254. On December 22, 2024, Judge Ademiluyi filed a Md. Rule 18-407(b)(1) written waiver with the Commission. Thus, Judge Ademiluyi gave the Commission permission to release to the public the summaries of the witness statements and all pre-charging documents. *Matter of White*, 451 Md. 630, 652–53 (2017) (the Commission could not argue pre charging activities with the Supreme Court unless subject judge filed a written waiver with the Commission).

255. The subject judge can give the Commission permission to disclose all documents Investigative Counsel provides to her except those the Board prohibits the Commission to view when the decision to charge is before them. The rule states, in pertinent part: Work Product,

Proceedings, and Deliberations... “the following matters shall be confidential...*subject to 18422(b)...(3)18-433(c)*, reports prepared by Investigative Counsel not submitted to the Commission.” Md. Rule 18-422(b)(3) *mandates* disclosure of fact work product; such as summaries of witness statements, but, not opinion work product contained in Investigative Counsel’s report. Summaries of witness statements are specifically carved out of the Rule 18407(a)(4) prohibitions that protect investigative counsel’s work product.

256. The cover up conspiracy now seek for the Attorney Grievance Commission to apply rules that don’t pertain to them to prevent Ademiluyi from publicizing the proceedings against her and publicly defending herself against the outrageous charges lodged against her.

257. Albright’s sealing, redaction, and exclusion of evidence while citing these rules prohibited creating a record of evidence that is exculpatory to Judge Ademiluyi but inculpatory to Judges Adam, Pearson, and Cotton, and operated as an unlawful prior restraint of speech under the First Amendment and was *ultra vires*.

WHEREFORE, Plaintiff Ademiluyi, prays that this Court will declare their application of Rule 18-407 and restraints on Ademiluyi’s speech as unconstitutional.

PLAINTIFF DEMANDS TRIAL BY JURY

Plaintiff hereby demands a trial by jury on all issues triable by right of jury, including the issues punitive damages and other damages.

Respectfully submitted,

_____/s/_____

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