

Mark this box if this form contains Restricted Information.



DISTRICT COURT OF MARYLAND FOR

Located at _____

Court Address _____

City/County _____

Telephone _____

Case No. _____

NOTE: Respondent will be served a copy of this completed document. Petitioner does not need to give an address if doing so risks further harm.

Name of Petitioner on Original Court Order _____

VS.

Name of Respondent on Original Court Order _____

Street Address, Apt. No. _____

Street Address, Apt. No. _____

Home _____

Home _____

City, State, Zip _____

Work _____

City, State, Zip _____

Work _____

E-mail _____

Telephone _____

E-mail _____

Telephone _____

**PETITION FOR CONTEMPT – PEACE ORDER
(Md. Rule 15-206)**

MDEC counties only: If this submission contains Restricted Information (confidential by statute, rule or court order) you must file a Notice Regarding Restricted Information Pursuant to Rule 20-201.1 (form MDJ-008) with this submission, and check the Restricted Information box on this form. I am the petitioner respondent in this case.

I state that:

1. On _____, this court ordered the following: _____
Date

2. That _____ has violated the court order as follows: *(state in detail*
Name of Violator
when, where, and how the violation occurred) _____

I request that this court pass an order finding that _____

Name of Violator

is in contempt of court, and granting any other relief that is necessary in this case. I request that the court send the respondent to jail until the court's order is obeyed.

_____ Date

_____ Signature

_____ Street Address (unless confidential)

_____ Printed Name

_____ City, State, Zip

_____ Fax

_____ E-mail

_____ Home Telephone

_____ Work Telephone

CERTIFICATE OF SERVICE

I certify that I served a copy of this notice upon the following party or parties by hand delivery mailing first-class mail, postage prepaid on _____ to:
Date

_____ Name

_____ Address

_____ City, State, Zip

_____ Name

_____ Address

_____ City, State, Zip

_____ Date

_____ Signature of Party Serving

DESCRIPTION OF ALLEGED VIOLATOR

Home Address: _____

Home Telephone: _____ Work Address: _____

Work Telephone: _____ Employer: _____

Work Hours: _____ Other Places/Times They Can Be Found: _____

DESCRIPTION: Driver's License # _____ State _____ Race _____ Sex _____ Ht _____

Wt _____ Hair _____ Eyes _____ DOB _____ FBI # _____ SID # _____

Complexion _____ Tattoos, Marks, Scars _____ Other _____

ADDENDUM: MOTION FOR CONTEMPT PAGE 2

ON 3/25/24 THIS COURT ORDERED THE RESPONDENT SHALL NOT COMMIT OR THREATEN TO COMMIT ANY OF THE FOLLOWING ACTS AGAINST THE PERSON FOR WHOM RELIEF IS SOUGHT; AN ACT WHICH CAUSES SERIOUS BODILY HARM; ASSAULT; FALSE IMPRISONMENT; **HARASSMENT**; STALKING; TRESPASS; **MISUSE OF TELEPHONE FACILITIES AND EQUIPMENT**; **MISUSE OF ELECTRONIC COMMUNICATION OR INTERACTIVE COMPUTER SERVICE**; REVENGE PORN OR VISUAL SURVEILLANCE.

ON APRIL 8TH AND 9TH, THE RESPONDENT JOSE DECASTRO DID VIOLATE THIS COURTS ORDER NOT TO COMMIT ANY OF THE FOLLOWING ACTS AGAINST THE PERSON FOR WHOM RELIEF IS SOUGHT; **HARASSMENT** BY MEANS OF **MISUSE OF TELEPHONE FACILITIES AND EQUIPMENT**; **MISUSE OF ELECTRONIC COMMUNICATION OR INTERACTIVE COMPUTER SERVICE** BY POSTING 2 VIDEOS MENTIONING MY NAME DIRECTLY AND SHOWING MY FUNDRAISER ON SCREEN WHILE DIRECTING HIS 500K FOLLOWERS TO MASS REPORT MY FUNDRAISER FOR FRAUD, CONTACT AND HARASS ANY PERSON WHO DONATED TO MY FUNDRAISER (MENTIONING THE FULL NAME OF MY LARGEST DONOR) IN AN ATTEMPT TO GET THEM TO REQUEST A REFUND FOR THE DONATION AND TO SEND IT TO HIM INSTEAD. HE ALSO MADE FALSE DISPARAGING CLAIMS ABOUT ME FURTHER CALLING ME A FRAUD WHICH CONTINUES HIS PATTERN OF REPEATED HARASSMENT AGAINST ME AIMED AT RUINING MY BUSINESS AND REPUTATION.

VIOLATION 1:

IN THE FIRST VIDEO WITH THE URL: <https://youtu.be/xgmtCh0d29s> TITLED "BIG UPDATE from Chille Delete Lawz from Jail" POSTED 4/8/24 MR DECASTRO'S ASSOCIATE BRIAN YOUNG STATED "I GOT SOMETHING REALLY IMPORTANT I WAS JUST INFORMED OF ABOUT 20 MINUTES AGO RIGHT BEFORE THIS LIVE, I GOT A CALL FROM CHILLE SAYING THAT HE'S GETTING SOME INSIDER INFORMATION THAT THIS GUY NAMED COLLIN CAMPBELL, WHO USED TO WORK FOR CHILLE WHO LOOKS..." PROVING THAT JOSE DECASTRO WHO GOES BY THE NICKNAME "CHILLE" IS THE ONE THAT DIRECTED HIM TO MAKE THE VIDEO HARASSING ME USING THE JAIL PHONES TO FURTHER HARASS ME USING HIS YOUTUBE CHANNEL. BY USING THE JAIL PHONES TO VIOLATE THE PEACE ORDER THAT VIOLATES THE **NO MISUSE OF TELEPHONE FACILITIES AND EQUIPMENT** PART OF THE PEACE ORDER AND BY DISSEMINATING THE VIDEO TO HIS YOUTUBE CHANNEL THAT VIOLATES THE **NO MISUSE OF ELECTRONIC COMMUNICATION OR INTERACTIVE COMPUTER SERVICE** (AS YOUTUBE IS AN INTERACTIVE COMPUTER SERVICE AND IS ALSO THE EXACT SAME THING HE DID TO GET THE PEACE ORDER PLACED AGAINST IN THE FIRST PLACE).

VIOLATION 2:

ON 4/9 MR DECASTRO AGAIN POSTED A VIDEO FROM JAIL TITLED "Latest REPORT Before Tomorrow's Hearing" WITH THE URL: <https://www.youtube.com/watch?v=cisDt3VqwTU> IN WHICH HE STATES ALL THE EXACT SAME CLAIMS AS THE FIRST VIDEO INCLUDING MY FULL NAME, SHOWING MY FUNDRAISER ON SCREEN WHILE **(IN HIS OWN VOICE THIS TIME)** DIRECTING HIS 500K FOLLOWERS TO MASS REPORT MY FUNDRAISER FOR

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FRAUD, CONTACT AND HARASS ANY PERSON WHO DONATED TO MY FUNDRAISER (MENTIONING THE FULL NAME OF MY LARGEST DONOR) IN AN ATTEMPT TO GET THEM TO REQUEST A REFUND FOR THE DONATION AND TO SEND IT TO HIM INSTEAD. HE ALSO MADE FALSE DISPARAGING CLAIMS ABOUT ME FURTHER CALLING ME A FRAUD WHICH CONTINUES HIS PATTERN OF REPEATED HARASSMENT AGAINST ME AIMED AT RUINING MY BUSINESS AND REPUTATION.

MR DECASTRO CONTINUES TO HARASS ME IN DIRECT VIOLATION OF THIS COURTS ORDER CAUSING ME SIGNIFICANT FEAR, FINANCIAL HARM, AND EMOTIONAL DISTRESS. IT IS CONCERNING THAT HE CONTINUES THIS BEHAVIOR EVEN FROM BEHIND BAR WHERE HE IS CURRENTLY INCARCERATED FOR 180 DAYS FOR UNRELATED CHARGES. MR DECASTRO SHOW ZERO RESPECT FOR THIS COURT OR ANY COURT FOR THAT MATTER JUDGING BY THE REATED VIOLATIONS OF THIS COURTS ORDER AS WELL AS HIS HISTORY OF HAVING MULTIPLE PROTECTIVE ORDERS AGAINST HI WHICH HE HAS ALSO SHOWN A PROPENSITY TO VIOLATE THEM MULTIPLE TIMES AS WELL. AND IF NOT HELD ACCOUNTABLE WILL CONTINUE TO VIOLATE THE PEACE ORDER AND CAUSE ME IRREPARABLE HARM.

RELIEF SOUGHT:

I RESPECTFULLY ASK THIS COURT TO HOLD MR DECASTRO IN CONTEMPT FOR VIOLATING THE PEACE ORDER AND SENTENCE HIM TO WHATEVER AMOUNT OF TIME IN JAIL AS THIS COURT SEES FIT. I ALSO ASK THAT MR DECASTROS PHONE PRIVILEGES BE REVOKED WHERE HE IS CURRENTLY INCARCERATED AT THE CLARK COUNTY DETENTION CENTER IN NEVADA. I HAVE ALREADY SPOKE WITH THE JAIL COMMANDER AND INFORMED HIM OF THE VIOLATIONS AND HE STATED HE WOULD HONOR ANY REQUEST BY THIS COURT IF MR DECASTRO WAS FOUND TO BE IN VIOLATION OF THE PEACE ORDER. ALL YOU WOULD NEED TO DO IS CONTACT THE JAIL.

IN FURTHERANCE OF MY MOTION I SUBMIT THE FOLLOWING:

HARASSMENT THROUGH CONTEXT: MARYLAND COURTS HAVE RECOGNIZED THAT A PEACE ORDER CAN ENCOMPASS HARASSMENT; EVEN WITHOUT PHYSICAL THREATS.

STATE V THOMAS 196 Md. App. 733 (Md. Ct. Spec. App. 2010) *not sure if correct case?*
DISCUSS ELECTRONIC COMMUNICATIONS USED TO HARASS. AND THAT THE VIDEO CONTENT ITSELF CONSTITUTES HARASSMENT SINCE IT REALS PRIVATE INFORMATION AND ALSO PORTRAYS PLAINTIFF IN A NEGATIVE LIGHT.

LEGAL DEFINITION OF HARASSMENT:

Harassment. "A person may not follow another in or about a public place or **maliciously engage in a course of conduct that alarms or seriously annoys the other: (1) with the intent to harass, alarm, or annoy the other; (2) after receiving a reasonable warning or**

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request to stop by or on behalf of the other; and (3) without a legal purpose." Md. Code CR § 3-803.

ROBERTS V STATE," 385 Md. 103, 867 A.2d 1063 (2005). In this case, the Maryland Court of Appeals addressed the issue of whether a series of harassing emails sent by the defendant constituted harassment under Maryland law. The defendant, Roberts, had sent numerous emails to the victim, including threats and derogatory language. The victim felt threatened and harassed by the emails and reported them to the authorities. Roberts was charged and convicted of harassment. The court affirmed Roberts' conviction, holding that the emails constituted harassment under Maryland law. The court emphasized that the repeated and unwanted nature of the emails, along with their threatening content, amounted to harassment. This case set a precedent in Maryland regarding the use of electronic communication to harass others and established that such behavior can lead to criminal charges.

CONSTRUCTIVE CONTACT: WHILE A PEACE ORDER USUALLY PROHIBITS PHYSICAL CONTACT, SOME COURTS ACKNOWLEDGE A CONCEPT OF "CONSTRUCTIVE CONTACT". THIS MEANS ANY FORM OF COMMUNICATION THAT DISRUPTS THE PLAINTIFF'S SENSE OF SECURITY OR PEACE OF MIND. THE VIDEO'S DISSEMINATION AS SUCH IS A FORM OF THAT CONSTRUCTIVE CONTACT GIVE THE VIDEO'S PORTRAY ME IN A NEGATIVE LIGHT ARE ARE MEANT TO, AND HAS CAUSED ME FURTHER HARM.ALSO TO BE TAKEN INTO ACCOUNT IS THE SIGNIFICANCE OF THE DEFENDANT'S FOLLOWING SINCE MR DECASTRO'S YOUTUBE CHANNEL HAS OVER HALF A MILLION FOLLOWERS OF RADICALIZED INDIVIDUALS WHO OFTEN HANG ON MR DECASTROS EVERY WORD AS GOSPEL AND HAVE ALSO HARASSED PLAINTIFF AS A RESULT OF THE VIDEOS

ADDITIONALLY **MARYLAND RULE 15-206:** CONSTRUCTIVE CIVIL CONTEMPT DEALS WITH ENFORCING COURT ORDERS THROUGH "CONSTRUCTIVE CIVIL CONTEMPT." WHILE IT DOESN'T DIRECTLY REFERENCE PEACE ORDERS,IT ESTABLISHES THE COURTS AUTHORITY TO HOLD SOMEONE IN CONTEMPT IF THEIR ACTION VIOLATES THE SPIRIT OF A COURT ORDER, EVEN IF THERE IS NO LITERAL VIOLATION

THIS CONCEPT CAN BE APPLIED TO PEACE ORDERS BECAUSE THE VIDEOS DISSEMINATION ON THE DEFENDANTS YOUTUBE CHANNEL WITH OVER 500K FOLLOWERS, DISRUPTS MY SENSE OF SECURITY AND PEACE OF MIND INTENDED TO BE PROTECTED BY THE COURT ORDER.

Submitted by: Collin Campbell 4/25/24

x: **COLLIN CAMPBELL (~ESIGNED) 4/25/24**

Collin Campbell

