

APPENDICES

The appendices are submitted solely to document the procedural history and jurisdictional facts relevant to this Petition. They are provided to facilitate verification of the record and are not offered for adjudication of the merits.

APPENDIX A — DISTRICT COURT

- A** Opinion and Order of the United States District Court for the District of Maryland dismissing the action (Feb. 5, 2025), and Order Denying Reconsideration (Apr. 11, 2025).

APPENDIX B — DISTRICT COURT DOCKET

- B** Selected docket entries from the United States District Court for the District of Maryland in Civil Case No. 1:25-cv-00211-SAG, reflecting filings and procedural posture.

APPENDIX C — FOURTH CIRCUIT DOCKET

- C** Selected docket entries and filings from the United States Court of Appeals for the Fourth Circuit in Case No. 25-1538, reflecting Petitioner's post-dismissal submissions, exhibit-related filings, and related procedural activity following the district court's denial of reconsideration.

APPENDIX D — FOIA AND RECORD ACCESS

- D** FOIA requests, agency responses, and determinations reflecting record availability and withholding.

APPENDIX E — CONSTITUTIONAL AND STATUTORY AUTHORITIES

- E** Relevant constitutional and statutory provisions, including U.S. Const. art. III; amends. I, V, VII, XIII; 42 U.S.C. §§ 2000e et seq.; 29 U.S.C. §§ 791, 794; 42 U.S.C. §§ 12101 et seq.; 5 U.S.C. § 552.

APPENDIX F — ADMINISTRATIVE RECORD

- F** Excerpts from the administrative record of the National Reconnaissance Office proceedings (as available to Petitioner), reflecting record scope, sequencing, and asserting gaps relevant to record access and process.

APPENDIX G — LEGISLATIVE AND DOCTRINAL CONTEXT

- G** Legislative and doctrinal context materials documenting Congress's identification of constitutional risks arising from executive secrecy, record asymmetry, and domestic information control, including excerpts from the Church Committee record and related authorities, cited solely to illuminate the procedural posture and structural due process questions presented.

APPENDIX H — STRUCTURAL FRAMEWORK

- H** Structural framework of record-dependent adjudication and separation-of-powers risk.

APPENDIX I — CHRONOLOGICAL INFORMATION

- I** Chronological information windows and temporal alignment.

APPENDIX J — PROCEDURAL TIMELINE

- J** Procedural timeline leading to district court proceedings.

APPENDIX K — LEGISLATIVE AND HISTORICAL CONTEXT

- K** Legislative and historical context materials bearing on record dependency, executive secrecy, and structural due process concerns.

APPENDIX L — LEGISLATIVE, HISTORICAL, MEDICAL, AND CONTEXTUAL MATERIALS

- L-1** Chronology of MK-ULTRA Oversight and Federal Legislative Reform (1953–1980)
- L-2** L-2. Legislative Safeguards Following Congressional Behavioral Research Findings
- L-3** L-3. Legislative and Statutory Framework Governing Lone-Actor ("Lone Wolf") Authorities
- L-4** L-4. The Manchurian Candidate, Behavioral Influence, and the Church Committee Era
- L-5** Chronological Incident Log and Contextual Narrative Summary
- L-6** L-6. Blacklisting, Intelligence Themes, and Public Discourse
- L-7** L-7. Temporal Information Windows and Contextual Alignment
- L-8** L-8. VA Medical Care, Community Care Requests, Privacy Requests, Treatment Delays, and Continuity-of-Care Failures (2026)

- L-8.1 L-8.1. VA Community Care Dental Treatment Delays, Requests for the Basis of the Treatment Plan Denial, and VA Response
- L-8.2 L-8.2. VA Community Care Dental Treatment Delays, Requests for Status, Care Coordination, Community Care Review, and Preservation of Records
- L-8.3 L-8.3. Request for Neutral, Objective Medical Evaluation, Continued Diagnostic Assessment, and Evidence-Based Treatment Planning
- L-8.4 L-8.4. Request for Written Communications, Administrative Privacy Protections, and Continued Access to VA Medical Care
- L-8.5 L-8.5. Request for Restriction of Contact, Privacy Office Acknowledgment, and Request for Administrative Communications
- L-8.6 L-8.6. VA Privacy Act Request to Restrict Disclosure of Medical Records and Request for an Accounting of Disclosures
- L-9 L-9. Social Engineering, Current Housing Situation, and Related Environmental Stressors
- L-9.1 L-9.1. Current Housing Conditions and Environmental Stressors
- L-9.2 L-9.2. Request to Remove an Erroneous Third-Party Address Association from Utility Records
- L-9.3 L-9.3. Request for Termination of Tenancy Based on Documented Environmental Stressors, Property Management Response, and Related Correspondence
- L-9.4 L-9.4. Reported Stalking Complaint to the Myrtle Beach Police Department by an Occupant of the Apartment Above Petitioner's Residence
- L-10 L-10. Veteran Suicide, Homelessness, and Continuing Harm to Disabled Veterans
- L-11 L-11. 2026 South Carolina Gubernatorial Debate, Hate Crime Discussion, Public Discourse, Political Environment
- L-12 L-12. Historical Chronology (1978–2015) Showing the Analytical Timeline

APPENDIX M — CONGRESSIONAL OVERSIGHT, HISTORICAL INTELLIGENCE-REVIEW MATERIALS, LEGISLATIVE-FACT REFERENCES, AND CONTEXTUAL TEMPORAL EXHIBITS

- M-1 Church Committee and Related Oversight Context
- M-2 Contextual Information Environment and Temporal Framework (2011–2024)
- M-3 Chronology of Drone-Related Events, Political Assassinations, Publicly Reported Violence, Petitioner's Contemporaneous Observations, Social Media Activity, and Administrative Proceedings (2017–2025)
- M-4 Church Committee Oversight Context and Plaintiff Chronology
- M-5 Chronology of Public Events, Historical References, and Contemporaneous Observations (2026)

M-6 Continuous Chain of Institutional Domination as Evidence of the Badges
and Incidents of Slavery Prohibited by the Thirteenth Amendment

APPENDIX A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Memorandum Opinion and Order Dismissing the Case

February 5, 2025

Order Denying Reconsideration

April 11, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

Notice of Judgment

March 31, 2026

Unpublished Per Curiam Opinion

March 31, 2026

Judgment

March 31, 2026

District Court Civil Action No. 1:25-cv-00211-SAG

Court of Appeals No. 25-1538

Filed Date: _____

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

KEFIM DEXTER DAVID,

Plaintiff,

v.

EEOC, *et al.*,

Defendants.

Civil Case No. SAG-25-cv-0211

MEMORANDUM OPINION

This Court has reviewed the Complaint filed by self-represented Plaintiff Kefim Dexter David ("Plaintiff") against the Equal Employment Opportunity Commission ("EEOC"), Dr. Christopher Scolese, and the National Aeronautics and Space Administration ("NASA"). ECF 1. The Clerk's Office sent deficiency notices to Plaintiff because he did not include an original signature on his filings. ECF 4, 5. Plaintiff seeks to file his Complaint *in forma pauperis* pursuant to 28 U.S.C. § 1915(a)(1), which permits an indigent litigant to commence an action in this court without prepaying the filing fee. To guard against possible abuses of this privilege, the statute requires dismissal of any claim that is (i) frivolous or malicious, (ii) fails to state a claim on which relief may be granted, or (iii) seeks monetary relief against a defendant who is immune from such relief. 28 U.S.C. § 1915(e)(2)(B).

This Court is mindful, however, of its obligation to liberally construe self-represented pleadings, such as the instant complaint. *See Erickson v. Pardus*, 551 U.S. 89, 94 (2007). Nevertheless, liberal construction does not mean that this court can ignore a clear failure in the pleading to allege facts which set forth a cognizable claim. *See Weller v. Dep't of Soc. Servs.*, 901 F.2d 387, 391 (4th Cir. 1990); *see also Beaudett v. City of Hampton*, 775 F.2d 1274, 1278 (4th

Cir. 1985) (stating a district court may not “conjure up questions never squarely presented.”). The Court must simply “hold the pro se complaint to less stringent standards than pleadings drafted by attorneys and must read the complaint liberally.” *White v. White*, 886 F.2d 721, 722–23 (4th Cir. 1989).

Whether a complaint states a claim for relief is assessed by reference to the pleading requirements of Federal Rule of Civil Procedure 8(a)(2). That rule provides that a complaint must contain a “short and plain statement of the claim showing that the pleader is entitled to relief.” The purpose of the rule is to provide the defendants with “fair notice” of the claims and the “grounds” underlying the claim to relief. *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555–56 (2007). To survive a motion under Rule 12(b)(6), a complaint must contain facts sufficient to “state a claim to relief that is plausible on its face.” *Id.* at 570.

Plaintiff’s Complaint consists of a general “overview” referencing a number of current and historical world events, a lengthy list of laws and statutes with some references to “supporting documentation” that is not attached to the Complaint, and then various requests for declaratory, monetary, and injunctive relief. ECF 1. The Complaint includes no facts describing any specific actions taken by any of the three named defendants or any resulting injury to Plaintiff. In the absence of any such allegations, the Complaint does not satisfy the *Twombly* standard and must be dismissed without prejudice.¹ Plaintiff’s motion to proceed *in forma pauperis*, ECF 2, will be denied as moot in the dismissal order which follows.

February 5, 2025

_____/s/
Stephanie A. Gallagher
United States District Judge

¹ This Court further notes that it appears from the Complaint that Plaintiff, who claims a Georgia address, is suing two federal agencies headquartered in DC and one individual with a Virginia address. The Complaint contains no factual allegations explaining why venue would lie in the District of Maryland.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

KEFIM DEXTER DAVID,

Plaintiff,

v.

EEOC, *et al.*,

Defendants.

Civil Case No. SAG-25-cv-0211

* * * * *

ORDER

For the reasons stated in the accompanying memorandum opinion, it is this 5th day of February, 2025, ORDERED that Plaintiff's motion to proceed *in forma pauperis*, ECF 2, is DENIED as moot, and the Complaint, ECF 1, is dismissed without prejudice.

The Clerk is directed to CLOSE the case.

/s/
Stephanie A. Gallagher
United States District Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

KEFIM DEXTER DAVID

*

v.

* CIVIL CASE NO. SAG-25-0211

CHARLOTTE A. BURROWS, et al

*

ORDER

This Court has reviewed Plaintiff's Motion to Reconsider the order dismissing his Complaint for failure to state a claim, ECF 8. The contents of the motion provide no basis for altering this Court's determination that the original Complaint failed to state a claim. While the motion contains a request for amendment, it does not provide the proposed amended complaint required by the Local Rules. Therefore, ECF 8 is DENIED, and ECF 9 (a renewed motion to proceed in forma pauperis) is again DENIED AS MOOT.

April 11, 2025

/s/
Stephanie A. Gallagher
United States District Judge

FILED: March 31, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUITNo. 25-1538, Kefim David v. Charlotte Burrows
1:25-cv-00211-SAG

NOTICE OF JUDGMENT

Judgment was entered on this date in accordance with Fed. R. App. P. 36. Please be advised of the following time periods:

PETITION FOR WRIT OF CERTIORARI: The time to file a petition for writ of certiorari runs from the date of entry of the judgment sought to be reviewed, and not from the date of issuance of the mandate. If a petition for rehearing is timely filed in the court of appeals, the time to file the petition for writ of certiorari for all parties runs from the date of the denial of the petition for rehearing or, if the petition for rehearing is granted, the subsequent entry of judgment. See Rule 13 of the Rules of the Supreme Court of the United States; www.supremecourt.gov.

VOUCHERS FOR PAYMENT OF APPOINTED OR ASSIGNED COUNSEL:

Vouchers must be submitted within 60 days of entry of judgment or denial of rehearing, whichever is later. If counsel files a petition for certiorari, the 60-day period runs from filing the certiorari petition. (Loc. R. 46(d)). If payment is being made from CJA funds, counsel should submit the CJA 20 or CJA 30 Voucher through the CJA eVoucher system. In cases not covered by the Criminal Justice Act, counsel should submit the Assigned Counsel Voucher to the clerk's office for payment from the Attorney Admission Fund. An Assigned Counsel Voucher will be sent to counsel shortly after entry of judgment. Forms and instructions are also available on the court's website, www.ca4.uscourts.gov, or from the clerk's office.

BILL OF COSTS: A party to whom costs are allowable, who desires taxation of costs, shall file a Bill of Costs within 14 calendar days of entry of judgment. (FRAP 39, Loc. R. 39(b)).

PETITION FOR REHEARING AND PETITION FOR REHEARING EN

BANC: A petition for rehearing must be filed within 14 calendar days after entry of judgment, except that in civil cases in which the United States or its officer or agency is a party, the petition must be filed within 45 days after entry of judgment. A petition for rehearing en banc must be filed within the same time limits and in the same document as the petition for rehearing and must be clearly identified in the title. The only grounds for an extension of time to file a petition for rehearing are the death or serious illness of counsel or a family member (or of a party or family member in pro se cases) or an extraordinary circumstance wholly beyond the control of counsel or a party proceeding without counsel.

Each case number to which the petition applies must be listed on the petition and included in the docket entry to identify the cases to which the petition applies. A timely filed petition for rehearing or petition for rehearing en banc stays the mandate and tolls the running of time for filing a petition for writ of certiorari. In consolidated criminal appeals, the filing of a petition for rehearing does not stay the mandate as to co-defendants not joining in the petition for rehearing. In consolidated civil appeals arising from the same civil action, the court's mandate will issue at the same time in all appeals.

A petition for rehearing must contain an introduction stating that, in counsel's judgment, one or more of the following situations exist: (1) a material factual or legal matter was overlooked; (2) a change in the law occurred after submission of the case and was overlooked; (3) the opinion conflicts with a decision of the U.S. Supreme Court, this court, or another court of appeals, and the conflict was not addressed; or (4) the case involves one or more questions of exceptional importance. A petition for rehearing, with or without a petition for rehearing en banc, may not exceed 3900 words if prepared by computer and may not exceed 15 pages if handwritten or prepared on a typewriter. Copies are not required unless requested by the court. (FRAP 40, Loc. R. 40(c)).

MANDATE: In original proceedings before this court, there is no mandate. Unless the court shortens or extends the time, in all other cases, the mandate issues 7 days after the expiration of the time for filing a petition for rehearing. A timely petition for rehearing, petition for rehearing en banc, or motion to stay the mandate will stay issuance of the mandate. If the petition or motion is denied, the mandate will issue 7 days later. A motion to stay the mandate will ordinarily be denied, unless the motion presents a substantial question or otherwise sets forth good or probable cause for a stay. (FRAP 41, Loc. R. 41).

U.S. COURT OF APPEAL FOR THE FOURTH CIRCUIT BILL OF COSTS FORM
(Civil Cases)

Directions: Under FRAP 39(a), the costs of appeal in a civil action are generally taxed against appellant if a judgment is affirmed or the appeal is dismissed. Costs are generally taxed against appellee if a judgment is reversed. If a judgment is affirmed in part, reversed in part, modified, or vacated, costs are taxed as the court orders. A party who wants costs taxed must, within 14 days after entry of judgment, file an itemized and verified bill of costs, as follows:

- Itemize any fee paid for docketing the appeal. The fee for docketing a case in the court of appeals is \$600 (effective 12/1/2023). The \$5 fee for filing a notice of appeal is recoverable as a cost in the district court.
 - Itemize the costs (not to exceed \$.15 per page) for copying the necessary number of formal briefs and appendices. (The court typically orders 4 copies when tentatively calendared; 0 copies for service unless brief/appendix is sealed.). The court bases the cost award on the page count of the electronic brief/appendix. Costs for briefs filed under an informal briefing order are not recoverable.
 - Cite the statutory authority for an award of costs if costs are sought for or against the United States. See 28 U.S.C. § 2412 (limiting costs to civil actions); 28 U.S.C. § 1915(f)(1) (prohibiting award of costs against the United States in cases proceeding without prepayment of fees).
- Any objections to the bill of costs must be filed within 14 days of service of the bill of costs. Costs are paid directly to the prevailing party or counsel, not to the clerk's office.

Case Number & Caption: _____

Prevailing Party Requesting Taxation of Costs: _____

Appellate Docketing Fee (prevailing appellants):			Amount Requested: _____			Amount Allowed: _____	
Document	No. of Pages		No. of Copies		Page Cost (≤\$.15)	Total Cost	
	Requested	Allowed (court use only)	Requested	Allowed (court use only)		Requested	Allowed (court use only)
TOTAL BILL OF COSTS:						\$0.00	\$0.00

1. If copying was done commercially, I have attached itemized bills. If copying was done in-house, I certify that my standard billing amount is not less than \$.15 per copy or, if less, I have reduced the amount charged to the lesser rate.
2. If costs are sought for or against the United States, I further certify that 28 U.S.C. § 2412 permits an award of costs.
3. I declare under penalty of perjury that these costs are true and correct and were necessarily incurred in this action.

Signature: _____ Date: _____

Certificate of Service

I certify that on this date I served this document as follows:

Signature: _____ Date: _____

FILED: March 31, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 25-1538
(1:25-cv-00211-SAG)

KEFIM DEXTER DAVID

Plaintiff - Appellant

v.

CHARLOTTE A. BURROWS, Chair, Equal Employment Opportunity
Commission (EEOC); DR. CHRISTOPHER SCOLESE, Former Director,
National Reconnaissance Office (NRO); BILL NELSON, Administrator, National
Aeronautics and Space Administration (NASA)

Defendants - Appellees

J U D G M E N T

In accordance with the decision of this court, the judgment of the district
court is affirmed.

This judgment shall take effect upon issuance of this court's mandate in
accordance with Fed. R. App. P. 41.

/s/ NWAMAKA ANOWI, CLERK

UNPUBLISHED**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

No. 25-1538

KEFIM DEXTER DAVID,

Plaintiff - Appellant,

v.

CHARLOTTE A. BURROWS, Chair, Equal Employment Opportunity
Commission (EEOC); DR. CHRISTOPHER SCOLESE, Former Director, National
Reconnaissance Office (NRO); BILL NELSON, Administrator, National
Aeronautics and Space Administration (NASA),

Defendants - Appellees.

Appeal from the United States District Court for the District of Maryland, at Baltimore.
Stephanie A. Gallagher, District Judge. (1:25-cv-00211-SAG)

Submitted: January 15, 2026

Decided: March 31, 2026

Before GREGORY and AGEE, Circuit Judges, and KEENAN, Senior Circuit Judge.

Affirmed by unpublished per curiam opinion.

Kefim Dexter David, Appellant Pro Se.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

Kefim Dexter David appeals the district court's orders dismissing his complaint without prejudice pursuant to 28 U.S.C. § 1915(e)(2)(B)(ii) and denying his motion to reconsider. On appeal, David contends that the district court erred in failing to consider the amended complaint submitted with his motion to reconsider. Upon review, we find that the error was harmless because David's amendment was futile. *See Save Our Sound OBX, Inc. v. N.C. Dep't of Transp.*, 914 F.3d 213, 227-28 (4th Cir. 2019) (cleaned up); Fed. R. Civ. P. 15(a)(2). Accordingly, we affirm the district court's orders. *David v. Burrows*, No. 1:25-cv-00211-SAG (D. Md. Feb. 5, 2025; Apr. 11, 2025). We deny all pending motions and dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

AFFIRMED

**Additional material
from this filing is
available in the
Clerk's Office.**