

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

CONRAD ROCKENHAUS,  
ADRIENNE ROCKENHAUS,  
35560 Grand River Ave 244  
Farmington Hills, MI 48335  
Plaintiffs,

v.

STYLIANOS AGAPIOU, et al.,  
Defendants.

Case No.: 2:25-cv-12716 (Lead Case)

Hon. Jane M. Beckering

Magistrate Judge Sally J. Berens

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**PLAINTIFF ADRIENNE ROCKENHAUS’S NOTICE OF INABILITY  
TO COMPLY WITH CONSOLIDATION ORDER, ASSERTION OF  
PLAINTIFF STATUS, AND CONDITIONAL MOTION FOR  
APPOINTMENT OF COUNSEL**

**I. STATUS AS NAMED PLAINTIFF**

Pursuant to this Court's Order of January 8, 2026 (ECF No. 22), Adrienne Rockenhaus has been designated a Plaintiff in this consolidated action. This Order supersedes and nullifies the reasoning in the Magistrate Judge's Order of December 16, 2025 (ECF No. 11), which struck Plaintiff's evidence solely on the erroneous premise that she was "neither a party nor an attorney." As a named Plaintiff, I now re-assert all evidence previously stricken.

## **II. NOTICE OF INABILITY TO COMPLY (MEDICAL PRECLUSION & COMPLEXITY)**

The Court has ordered Plaintiffs to file a "Consolidated Complaint" within 14 days. I respectfully notify the Court that I cannot comply with this directive in the manner requested.

1. **Medical Incapacity:** Attached as ***Exhibit A*** is a letter from my treating psychiatrist, Dr. Robert Garcia, MD. Dr. Garcia confirms that I suffer from severe PTSD symptoms that are "notably exacerbated in high-stakes or adversarial environments such as legal proceedings."

2. **Request for Reasonable Accommodation (ADA & Rehabilitation Act):** This Notice serves as a formal request for reasonable accommodation under Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973. Dr. Garcia's

attached medical determination [**Exhibit A**] confirms that I hold a qualifying disability that prevents me from safely navigating these adversarial proceedings pro se. The Court is required to provide accommodations to ensure meaningful access to justice. As explicitly recommended by my treating physician, the necessary "reasonable accommodation" to mitigate this disability is the appointment of counsel to act as an intermediary. Denying this accommodation would effectively bar a disabled Plaintiff from the Court.

**3. Impossibility of Joint Compliance (Co-Plaintiff's Incapacity & ADA Status):** The Court's January 8 Order commands "Plaintiffs" to file a single consolidated complaint. Compliance with this Order requires joint coordination between myself and Co-Plaintiff Conrad Rockenhaus. **This is impossible.** Mr. Rockenhaus is a 100% service-connected disabled veteran suffering from a combat-related Traumatic Brain Injury (TBI) that was **severely** exacerbated by the Defendants' assault on September 4, 2025. He is currently held in solitary confinement, experiencing uncontrolled seizures and cognitive decline. Because the facility is denying him necessary ADA accommodations (such as medical stabilization, TBI care, and legal assistance), he is physically and mentally incapable of participating in the drafting of complex pleadings. **I cannot consolidate**

**my claims with a Co-Plaintiff who has been rendered legally and medically effectively absent by the Defendants.**

**4. The "Consolidation" Trap:** To file a proper Consolidated Complaint, I would need to join approximately 20 additional federal defendants (Marshals, Warden, Guards) to address the violent raid on September 4, 2025, and the subsequent **harassment, extortion, terrorization, torture, medical neglect, and lethal conditions that are actively killing my husband.** This expanded complaint would need to include evidence of ongoing retaliation against me personally, including **being run off the road** by federal agents and subjected to **financial extortion schemes via Cash App** orchestrated through the prison network. I possess digital forensic evidence linking these acts to federal agents. I am medically and legally unable to perform this complex expansion of the litigation *pro se*. Forcing me to file a complaint that omits these critical developments would present a false and sanitized narrative to the Court; forcing me to attempt to plead them myself violates my doctor's orders.

**5. State-Created Incapacity and Manifest Injustice:** It creates a perverse incentive and a manifest injustice for the Court to dismiss this action based on my inability to file complex pleadings when **that inability was caused by the Defendants themselves.** The Defendants have

created a living horror movie for my family. The U.S. Marshals violently raided my 2nd sanctuary home, beating my **disabled veteran husband with a combat TBI** (who did not live there) into a seizure, and are now holding him in a solitary confinement cell where he is seizing to death, being denied medical care, and tortured by guards displaying hate-group tattoos. This violence physically disabled my husband and psychologically broke me. For the Judiciary to punish us for the very injuries the Executive Branch inflicted is not justice; it is the ratification of witness intimidation. The Court cannot demand performance from a litigant after the government has systematically stripped them of the capacity to perform.

### **III. THE RETALIATION & JUDGE SHOPPING TIMELINE (PRESERVATION OF RECORD)**

For the record, and to prevent any further "striking" of facts, the Consolidated Complaint cannot be sanitized of the following:

- **August 28, 2025:** Plaintiffs filed Civil Rights Complaints 2:25-cv-12716 and 2:25-cv-12736 against U.S. Probation Officers.
- **September 4, 2025 (7 Days Later):** U.S. Marshals executed a "Tactical Breach" of Plaintiff's second sanctuary home. This residence was not Conrad Rockenhaus's registered address and was not known to Probation. A neighbor is prepared to testify that federal agents

were stalking me at this private location for days prior to the breach, proving this was a targeted retaliatory hit, not a routine supervision arrest.

- **Proof of "Judge Shopping"(*Exhibit B*):** To execute this retaliatory raid, Defendants bypassed the Federal Judiciary and obtained a "Secret" warrant from a State County Judge (Judge Anzalone, Lenawee County) because no Federal Magistrate would have authorized a tactical raid on a disabled veteran for a technical violation at a home where he did not even reside.
- **Innocence:** Plaintiff Conrad Rockenhaus was innocent of the alleged violations; the raid was a pretext for retaliation against a whistleblower. The violence inflicted during this illegal raid caused the TBI and seizures he is now dying from in the SHU.

**IV. CONDITIONAL MOTION & DEMAND FOR RELIEF** Given my medical inability to proceed *pro se* without severe harm, and my **disabled veteran husband's** medical crisis in custody, I move this Court for the following **IMMEDIATE** relief before any deadlines are enforced:

**1. APPOINT CONFLICT-FREE, OUT-OF-DISTRICT COUNSEL:**

Pursuant to Dr. Garcia's medical recommendation and 28 U.S.C. § 1915(e)(1), the Court must appoint counsel immediately. **Crucially,**

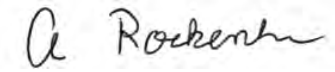
**appointed counsel must be located outside the Eastern and Western Districts of Michigan, and unconnected to any local federal practice.** Given that the harm involves local Federal Judges, Probation, U.S. Marshals, and the extortion network operating within Michigan federal prisons, no local attorney can represent Plaintiffs without fear of professional reprisal or conflict of interest. Effective assistance requires counsel insulated from the local "club" and corruption alleged herein.

2. **RECUSAL AND CHANGE OF VENUE:** I demand the recusal of Judge Beckering and Magistrate Berens due to the appearance of bias demonstrated by the striking of valid evidence regarding torture and the "closing" of my case to silence me. Furthermore, given the involvement of local federal agents in the extortion and stalking of Plaintiff, I request the case be transferred to an impartial District **outside the State of Michigan** to ensure safety and fairness.
3. **STAY OF DEADLINES:** All deadlines for the "Consolidated Complaint" must be STAYED until Conrad Rockenhaus receives neurological care and conflict-free counsel is appointed.

***I am not refusing to litigate; I am reporting that the Defendants' violence and the Court's procedural maneuvers***

***have rendered me medically unable to do so safely without counsel.***

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "A. Rockenhaus".

Adrienne Rockenhaus | Plaintiff Pro Se | Jan 11, 2026

734-585-6277 | [adrienne@rockenhaus.com](mailto:adrienne@rockenhaus.com)



## **INDEX OF EXHIBITS**

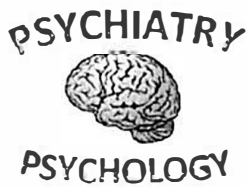
### **Exhibit A**

**Letter from Dr. Robert Garcia, MD (Psychiatrist)** Confirming Plaintiff Adrienne Rockenhaus's medical incapacity, severe PTSD, and inability to safely represent herself *pro se* due to trauma caused by the Defendants.

### **Exhibit B**

**State Search Warrant & Affidavit (Lenawee County)** The Judge-shopped warrant obtained by U.S. Marshal Brett Fimbinger from a State County Judge to execute the September 4, 2025 raid, demonstrating the Judge Shopping used to bypass Federal jurisdiction.

# *EXHIBIT A*



**THE PSYCHIATRY AND PSYCHOLOGY CENTER**

650 GRISWOLD ST, NORTHVILLE, MI 48167  
PHONE (248) 912-0080  
FAX (248) 912-0208

December 1<sup>st</sup>, 2025

RE: Adrienne Rockenhaus  
DOB: 08/16/1979

To the Honorable United States District Court,

I am Dr. Robert Garcia, MD, a board-certified psychiatrist practicing in Northville, Michigan. I am currently the treating psychiatrist for Adrienne Rockenhaus, who is under my ongoing care at The Psychiatry & Psychology Center.

Adrienne has a longstanding history of anxiety and trauma-related symptoms, which have been further intensified by recent traumatic experiences. She currently exhibits PTSD-like symptoms including:

- Severe stress responses during conflict or procedural demands
- Difficulty maintaining emotional regulation under pressure
- Episodes of overwhelming anxiety that interfere with her ability to communicate or advocate for herself effectively

These symptoms are chronic, and they are notably exacerbated in high-stakes or adversarial environments such as legal proceedings. Based on my clinical assessment, it is my professional opinion that Adrienne is not able to safely represent herself in a federal civil matter. The stress and demands of self-representation would likely result in significant deterioration of her mental health and could worsen her symptoms.

For these reasons, I recommend that Adrienne be appointed legal counsel to ensure her ability to participate in legal proceedings without undue risk to her mental health.

Sincerely,

Robert Garcia, MD  
Diplomate of the American Board of Psychiatry & Neurology  
Fellow of the American Psychiatric Association  
An affiliate of Henry Ford/Ascension Health Medical Staff

# *EXHIBIT B*

# UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

**RECEIVED**

By Amy Godlewski at 3:26 pm, Aug 21, 2025

United States of America  
v.

Case No. 23-CR-20701-01

ROCKENHAUS, Conrad  
Defendant

FILED USDC - CLERK DET  
2025 SEP 5 PM 12:07

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Conrad Rockenhaus

who is accused of an offense or violation based on the following document filed with the court by U.S. Probation Officer Stylianos Agapiou, 313-655-2842:

- ☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☐ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☒ Order of the Court

This offense is briefly described as follows:

Violation of bond conditions. Order of the Court to revoke bond due to continued non-compliance.

Date: August 20, 2025



Issuing officer's signature

City and state: Detroit, Michigan

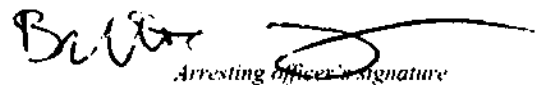
Stephen J. Murphy, III, Chief United States District Judge  
Printed name and title

### Return

This warrant was received on (date) 9/4/25  
at (city and state) [REDACTED]

, and the person was arrested on (date) 9/4/25

Date: 9/4/25



Arresting officer's signature

Brett Frangione, Decon  
Printed name and title

State Of Michigan

**SEARCH WARRANT & AFFIDAVIT**

County of Lenawee SS

**TO THE SHERIFF OR ANY PEACE OFFICER OF SAID COUNTY:**

I, Deputy United States Marshal Brett Fimbinger, hereby referred to as Affiant, having subscribed and sworn to an affidavit for a Search Warrant, and I having under oath examined Affiant, am satisfied that probable cause exists:

THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN, I COMMAND THAT YOU SEARCH THE FOLLOWING DESCRIBED PLACES:

Legal Description of property:

Further described as a single-family residence facing north on [REDACTED] The mailbox is on the front of the yard, with a [REDACTED] The numbers read [REDACTED] The residence is [REDACTED] The driveway is to the west of the residence [REDACTED] he [REDACTED]

**AND THE PERSON OF: Conrad Rockenhaus W/M 2-3-1982**  
**Rockenhaus is wanted out of the Eastern District of Michigan for violation of supervised release, his second time being charged.**

The search is to include the entire premises, curtilage, all out buildings, garages or other storage buildings related to the above described premises, all containers on the premises.

Any and all out buildings, trailers, or garages at the time the search warrant is executed.

Any and all persons present and their clothing at the time the search warrant is executed.

Any and all communication devices including but not limited to cell phones and pagers.

Any and all vehicles associated with the residence at the time the search warrant is executed

**And that the items to be seized, secured, tabulated according to law are the following property and things:**

Any and ALL items related to **Conrad Rockenhaus** including but not limited to writings, mail, letters, journals, documents, phone records, bank statements, power of attorney documents, property records, photographs.

Any and all items related to aliases of **Conrad Rockenhaus**

AMA

State Of Michigan

SEARCH WARRANT & AFFIDAVIT

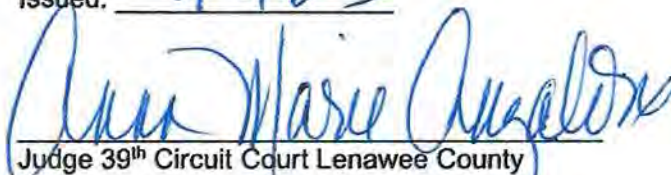
County of Lenawee SS

Any and all weapons including but not limited to firearms.

Any and all evidence associated with the crimes in the State of MICHIGAN

**IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN:** I have found that probable cause exists and you are commanded to make the search and seize the described property. Leave a copy of this warrant and tabulation (a written inventory) of all property taken with the person from whom the property was taken or at the premises. You are further commanded to promptly return this warrant and tabulation to the court.

Issued: 9-4-25

  
Judge 39<sup>th</sup> Circuit Court Lenawee County

## **CERTIFICATE OF SERVICE**

I hereby certify that on Jan 11, I served a copy of the foregoing:

**PLAINTIFF ADRIENNE ROCKENHAUS'S NOTICE OF INABILITY TO COMPLY WITH CONSOLIDATION ORDER, ASSERTION OF PLAINTIFF STATUS, AND CONDITIONAL MOTION FOR APPOINTMENT OF COUNSEL (together with Exhibits A and B)**

Upon the following counsel and Defendants via U.S. Mail:

**Benjamin A. Anchill**

U.S. Attorney's Office, E.D. Michigan  
211 W. Fort St., Suite 2001  
Detroit, MI 48226

**Jeffry W. Konal**

Supervisory U.S. Probation Officer  
231 W. Lafayette Blvd.  
Detroit, MI 48226

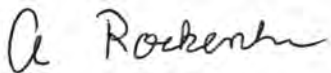
**Dion Thomas**

Deputy Chief U.S. Probation Officer  
231 W. Lafayette Blvd.  
Detroit, MI 48226

**Stylianos Agapiou**

U.S. Probation Officer  
P.O. Box 8289  
Ann Arbor, MI 48104

Respectfully Submitted,



Adrienne Rockenhaus | Plaintiff Pro Se  
734-585-6277 | adrienne@rockenhaus.com

35560 Grand River Ave 244 | Farmington Hills, MI 48335