

UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT

IMRE KIFOR,  
Plaintiff-Appellant,

v.

THE COMMONWEALTH OF  
MASSACHUSETTS, MIDDLESEX  
PROBATE AND FAMILY COURT,  
MASSACHUSETTS DEPARTMENT  
OF REVENUE CHILD SUPPORT  
ENFORCEMENT DIVISION, YALE  
SCHOOL OF MEDICINE, THE  
COUNSELING CENTER OF NEW  
ENGLAND, and ATRIUS HEALTH,  
INC.,  
Defendants-Appellees.

CIVIL ACTION  
No. 23-1008

**PLAINTIFF-APPELLANT’S STATUS AFFIDAVIT ON FURTHER  
EVIDENCE AGAINST THE DEFENDANTS-APPELLEES’  
MOTION FOR SUMMARY DISPOSITION**

The Plaintiff-Appellant, Imre Kifor (“Father”), respectfully states as follows:

- 1) The Defendant-Appellee Middlesex Probate And Family Court (“Family Court”) held simultaneous hearings in Father’s parallel matters on 3/23/2023.
- 2) The Family Court’s Probation Department concluded that Father had complied with the weekly “seek work” orders as he had submitted **630+** job applications

by 3/21/2023. Consequently, the Family Court seemed to admit that Father had not been the “right candidate” for the retaliatory and thus obsessive program.

- 3) Should the Family Court relax the absolute control over Father’s employment, Father will immediately cease claiming a “joint employment” relationship.
- 4) Through the allowed endlessly renewed frivolous complaints for contempt, the Family Court has waged a years-long “war of attrition” on Father. Despite the arrests and the damaging jail sentence, a switch to eject Father’s now 19 years old twins from the Family Court occurred on 3/23/2023 (see attached affidavit).
- 5) The Defendant-Appellee Massachusetts Department Of Revenue - Child Support Enforcement Division (“DOR”) issued an Annual Notice Of Child Support Delinquency to Father on 3/7/2023 with the option to request a review.
- 6) On 3/25/2023, Father submitted his Request For Administrative Review to the DOR (see Father’s letter and supporting documents attached in the addendum).
- 7) December 2017 was the last time the forcedly indigent Father could pay his ~\$5K monthly obligations ordered by the Family Court for his four children. Therefore, Father’s in-arrears obligations will reach **\$320,000+** on 4/1/2023.
- 8) According to the [Child Support Enforcement: Program Basics](#)<sup>1</sup>, i.e., “a federal-state matching (financial assistance) grant program under which states must

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<sup>1</sup> <https://crsreports.congress.gov/product/pdf/RS/RS22380>

spend money in order to receive federal funding,” Father has been lawfully attempting to modify the parallel Family Court matters since January 2018.

- 9) Father’s parallel matters in the Family Court have now consumed ~80 hearings.
- 10) The matters have touched all the CSE program’s core services and incentive payments in addition to the DOR’s involvement that only started on 2/19/2019.
- 11) Therefore, the DOR Notice Of Delinquency also confirms that the state has received significant federal financial assistance as “federal reimbursements.”
- 12) Accordingly, Title VI of the Civil Rights Act of 1964 should apply to the CSE program’s “review and modification of child support orders” as its core service.
- 13) Leading up to the 3/23/2023 hearing, and after the Family Court repeated the already duly substantiated 18 U.S.C. § 1961(1) retaliations and mail (and wire) fraud RICO predicate acts by not communicating any indigency decisions with Father, a sudden **secretive “gatekeeper order”** manifested itself on 3/7/2023.
- 14) After confirming the existence of such arbitrary, untraceable, and unappealable (as they are not based on statutes) instruments on 3/23/2023, Father filed his attached Motion To Stay Pending Appeal with the District Court on 3/24/2023.
- 15) To frame the overriding cause for Father’s existential struggle in the Family Court, i.e., “is the ‘open-ended’ and thus manipulatable federal program constitutional as currently practiced by Massachusetts?”, Father refiled his Petition for Writ of Certiorari with the U.S. Supreme Court on 3/19/2023.

16) Also, on 3/6/2023, Father filed his Mass. Supreme Judicial Court Appeal by asserting: “Therefore, as the State now openly asserts that ‘men can get pregnant,’ and Father is undoubtedly not a man who could ever get pregnant, Father ceases to exist as a man worthy of any protection by the State.”

**“Gatekeeper Orders”: Specific And Generic Discrimination**

17) During the 3/23/2023 hearing, the Family Court insisted that Father’s objective with the lawsuits had been to “reduce child support amounts,” demanding that Father agree to that falsity under oath. Father respectfully rejected the narrative and restated that he wanted **“to triple”** his support for his children. Father is a trained, skilled, and hard-working professional, and without the systemic fraud unleashed upon him, Father would have no issues supporting his dear children.

18) The bullying episode by the Family Court was identical to Father’s experience in Romania with the [Securitate](#)<sup>2</sup> (the Secret Police). The Securitate’s practice was to fabricate a “crime” and then threaten its targets until they agreed to become informants. No defenses, arguments, or discussions were ever allowed, eerily similar to the Family Court’s latest secretive “gatekeeper orders.”

19) Father never gave in to the Securitate, despite being beaten and later isolated. Therefore, Father will not sabotage his children by folding under pressure.

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<sup>2</sup> <https://en.wikipedia.org/wiki/Securitate>

- 20) And contrary to the allowed trivialization by the Family Court, see the trial transcripts on pages 204-211, the Secret Police in communist tyrannies did not formally arrest their targets. The Secret Police came at night and operated just like the Family Court does by setting traps, resorting to informal house arrests, and using endless cruel psychological torture. And by leveraging loved ones.
- 21) This shared agenda is captured precisely by the transcript on page 203: **“But don’t you agree that he needs to accept his role in what happened to the children to understand how to change his behavior? GAL: Yes, I do.”**
- 22) Father was the ideal candidate for activist “reprogramming.” He was from Romania, and as per [Hillary Clinton](#)<sup>3</sup>: “‘The Government Has No Business’ In Abortion Decisions. **We are not Romania,**” and “I’ve been to countries where governments forced women to bear children like they used to do in Romania.”
- 23) The activist GALs immediately fabricated a false narrative by delegitimizing Father’s mother, see the GALs’ report, page 166, and Father’s affidavit, pages 169-172, and then setting their “experiment”’s goal by mandating “supervised visits only, indefinitely, due to the history of punitive behaviors and data that suggest Mr. Kifor will not be amenable to mental health treatment,” page 167.
- 24) As Harvard psychologists, i.e., without “first, do no harm” Hippocratic Oaths, the activist GALs were purpose trained to invalidate and provoke their subjects

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<sup>3</sup> [https://www.huffpost.com/entry/hillary-clinton-abortion-debate\\_n\\_5808457de4b0180a36e92518](https://www.huffpost.com/entry/hillary-clinton-abortion-debate_n_5808457de4b0180a36e92518)

to such a massive degree that even the hallmarks of manic psychosis, e.g., “unusually strong expenditures of energy” would appear, see pages 173-175.

- 25) Could a sadistic zoo keeper use massive federal assistance to endlessly poke and torture their bleeding caged animals until their openly public collapse?
- 26) Yet Father, who was used to the communist “weaponized psychology,” never turned violent, avoided succumbing to depression, never became sick, and most importantly, never gave up hope despite his deliberately induced full indigency.
- 27) A significant amount of federal assistance has been diverted by the state to continue to finance this specific sadistic activist “experiment,” **a targeted discrimination based on national origin** in Father’s specific case, armed with systemically fabricated “mental health” fraud only to see how to “reprogram” men who cannot ever get pregnant but still want a connection with their dear deliberately stolen children. In the case of the class, the generic discrimination would take other forms, but the core discrimination against the men who know with certainty that they cannot get pregnant yet want children would be shared.
- 28) Father is now ready to amend his original Civil RICO Class Action Complaint with simultaneous claims of deliberate violations of his civil rights by the state, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., and 42 U.S.C. § 1983, as the direct “targeting modalities” of each and every substantiated RICO predicate act, transcending the state’s sovereign immunity.

29) Moreover, Father is also ready to amend the list of Defendants with the other activist GAL, **Dr. Robin Deutsch, PhD.** and Father's ex-wife, [REDACTED], the mother of Father's now 19 years old twins to be imminently ejected by the Family Court as "grown adults needing no parental protection."

Signed under the pains and penalties of perjury.

March 26, 2023

Respectfully submitted,

/s/ Imre Kifor

Imre Kifor, Pro Se

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I have no phone

I have no valid driver's license

I have to move to a homeless shelter

<https://femfas.net>

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