

Imre Kifor

[REDACTED]  
Newton, MA 02464

[ikifor@gmail.com](mailto:ikifor@gmail.com)

I have no phone

I have no valid driver's license

I have to move to a homeless shelter

<https://femfas.net>

January 14, 2024

Francis V. Kenneally, Clerk  
Supreme Judicial Court  
John Adams Courthouse  
One Pemberton Sq., Suite 1400  
Boston, MA 02108-1724  
[SJCCommClerk@sjc.state.ma.us](mailto:SJCCommClerk@sjc.state.ma.us)

Maura S. Doyle, Clerk  
SJC for The County of Suffolk  
John Adams Courthouse  
One Pemberton Sq., Suite 1300  
Boston, MA 02108-1707  
[newsjcsinglejusticecase@jud.state.ma.us](mailto:newsjcsinglejusticecase@jud.state.ma.us)

**SUBMITTED FOR:** Kifor v. The Commonwealth of Mass. et al. - SJ-2023-M014

Dear Clerks Kenneally and Doyle,

On 12/18/2023, I submitted my motion for leave and petition to the Supreme Judicial Court. Conclusive proof for the State deploying forced separation and extreme parental alienation of children as sustained statutory (G.L.c. 151B) retaliations came only on 1/10/2024 when the Probation Officer confirmed to me upon the Family Court orders that my minor children felt so alienated and so utterly "fatherless" that they wanted to change even their names. These are my "State-owned" children who never had contact with their loving father outside of the agenda-driven and deliberately retaliatory "supervised visitations."

To substantiate my comprehensive G.L. c. 151B claims, I would like to extend my petition with the attached:

1. Imre Kifor's Status Affidavit And Memorandum Of Law On Continued Systemic Discriminations And Retaliations and exhibits.

Respectfully,  
/s/ Imre Kifor, Pro Se

Enclosure

Cc: Ying Mo, Esq., EEOC Project Coordinator, MCAD, via [EEOCWeight@state.ma.us](mailto:EEOCWeight@state.ma.us)  
Katherine B. Dirks, Esq., Assistant Attorney General, via [katherine.dirks@mass.gov](mailto:katherine.dirks@mass.gov)  
Michael G. Xavier, Esq. (for [REDACTED]), via [mxavier@princelobel.com](mailto:mxavier@princelobel.com)  
[REDACTED], Pro Se, via [REDACTED]

SUPREME JUDICIAL COURT  
for Suffolk County  
Case Docket

IMRE KIFOR v. THE COMMONWEALTH OF MASSACHUSETTS,  
GOVERNOR MAURA HEALY (OFFICIAL CAPACITY), ATTORNEY  
GENERAL ANDREA CAMPBELL (OFFICIAL CAPACITY),  
COMMISSIONER GEOFFREY SYNDER (OFFICIAL CAPACITY,  
MA DOR CSE), MIDDLESEX PROBATE AND FAMILY COURT,  
[REDACTED] AND [REDACTED]  
THIS CASE CONTAINS IMPOUNDED MATERIAL OR PID  
SJ-2023-M014

CASE HEADER

<b>Case Status</b>	Active: Motion Pending	<b>Status Date</b>	12/18/2023
<b>Nature</b>	Superintendence c 211 s 3	<b>Entry Date</b>	12/18/2023
<b>Sub-Nature</b>	Not Applicable	<b>Single Justice</b>	
<b>TC Ruling</b>		<b>TC Ruling Date</b>	
<b>SJ Ruling</b>		<b>TC Number</b>	
<b>Pet Role Below</b>		<b>Full Ct Number</b>	
<b>Lower Court</b>		<b>Lower Ct Judge</b>	

INVOLVED PARTY

**Imre Kifor**  
Pro Se Petitioner

**The Commonwealth of Massachusetts**  
Respondent

**Governor Maura Healy (Official Capacity)**  
Respondent

**Attorney General Andrea Campbell (Official Capacity)**  
Respondent

**Commissioner Geoffrey Syder (Official Capacity, MA DOR CSE)**  
Respondent

**Middlesex Probate and Family Ct.**  
Respondent

[REDACTED]  
Respondent

[REDACTED]  
Pro Se Respondent

ATTORNEY APPEARANCE

[Katherine B. Dirks, Assistant Attorney General](#)

[Katherine B. Dirks, Assistant Attorney General](#)

[Katherine B. Dirks, Assistant Attorney General](#)

[Katherine B. Dirks, Assistant Attorney General](#)

[Katherine B. Dirks, Assistant Attorney General](#)

[Michael Gabriel Xavier, Esquire](#)

DOCKET ENTRIES

Entry Date	Paper	Entry Text
12/18/2023		Case entered.
12/18/2023	#1	(IMPOUNDED) Affidavit of Indigency Request for Waiver, Substitution or State Payment Fees & Costs pursuant to G. L. c. 261, s. 27A-G, filed by Imre Kifor, pro se.
12/18/2023	#2	MOTION to Waive Entry Fee, filed by Imre Kifor, pro se.

12/18/2023	#3	Imre Kifor's MOTION For Leave to File, filed by Imre Kifor, pro se.
12/18/2023	#4	Imre Kifor's Emergency Petition to Correct and Prevent Ongoing Errors Pursuant to G.L.c. 211, sec. 3, filed by Imre Kifor, pro se.
12/18/2023	#5	Imre Kifor's Record Appendices I-V to Petition to Correct and Prevent Ongoing Errors, filed by Imre Kifor, pro se.
12/18/2023	#6	Copy of Letter to EEOC Project Coordinator From Imre Kifor, pro se, filed.
01/01/2024	#7	Letter to Clerks Kenneally and Doyle, dated January 1, 2024 saying "On 12/18/2023, I submitted my motion for leave and petition to the Supreme Judicial Court. In the petition I indicated that I would be filing my third petition for a writ of certioari with the U.S. Supreme Court. Subject to the Supreme Judicial Court's decision on my motion for leave, I therefore respectfully amend my petition with the attached: 1. Imre Kifor's Status Affidavit on Federal Question filed with the U.S. Supreme Court." filed.
01/01/2024	#8	Imre Kifor's Status Affidavit on Federal Question filed with the U.S. Supreme Court with attachment filed by Imre Kifor, pro se.
01/16/2024	#9	Imre Kifor's Status Affidavit and Memorandum of Law on Continued Systemic Discrimination and Retaliations with Certificate of Service and attachments filed by Imre Kifor, pro se.

As of 01/16/2024 10:25am

COMMONWEALTH OF MASSACHUSETTS

SUPREME JUDICIAL COURT

SUFFOLK, ss

DOCKET No.

IMRE KIFOR,

Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS,

GOVERNOR MAURA HEALY (official capacity)

ATTORNEY GENERAL ANDREA CAMPBELL (official capacity),

COMMISSIONER GEOFFREY SNYDER (official capacity, MA  
DOR CSE),

MIDDLESEX PROBATE AND FAMILY COURT,

[REDACTED],

[REDACTED],

Respondents.

**Imre Kifor's Status Affidavit And Memorandum Of Law On  
Continued Systemic Discriminations And Retaliations**

Date: 1/13/2024

Imre Kifor, Pro Se

[REDACTED]

Newton, MA 02464

[ikifor@gmail.com](mailto:ikifor@gmail.com)

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**COMMONWEALTH OF MASSACHUSETTS**

**SUPREME JUDICIAL COURT**

SUFFOLK, ss

DOCKET No.

IMRE KIFOR,

Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS,

GOVERNOR MAURA HEALY (official capacity)

ATTORNEY GENERAL ANDREA CAMPBELL (official capacity),

COMMISSIONER GEOFFREY SNYDER (official capacity, MA  
DOR CSE),

MIDDLESEX PROBATE AND FAMILY COURT,

████████████████████,

████████████████████,

Respondents.

**IMRE KIFOR'S STATUS AFFIDAVIT AND MEMORANDUM OF LAW ON  
CONTINUED SYSTEMIC DISCRIMINATIONS AND RETALIATIONS**

The Petitioner, Imre Kifor ("Father"), respectfully  
states:

1. Satisfying the conditions mandated by this Court,  
Father submitted his Motion For Leave To File and his  
Emergency Petition To Correct And Prevent Ongoing  
Errors Pursuant To G.L.c. 211, § 3, on 12/18/2023.

2. In his emergency petition, Father reiterated that "the erroneous and specific court proceedings are ongoing in the Middlesex Probate And Family Court ('Family Court'), with recent acts and manifestations occurring since this Court last ruled on the matters."

3. G.L.c. 151B, § 9, permits "[a]ny person claiming to be aggrieved by a practice made unlawful under this chapter" to bring a civil action for injunctive relief and damages. Father substantiates herein that Family Court (and implicitly the State) continues to commit deliberate G.L.c. 151B, § 4, "unlawful practices."

4. These are: "It shall be an unlawful practice:

(4) For any person, employer, labor organization or employment agency to discharge, expel or otherwise discriminate against any person because he has opposed any practices forbidden under this chapter or because he has filed a complaint, testified or assisted in any proceeding under section five;

(4A) For any person to coerce, intimidate, threaten, or interfere with another person in the exercise or enjoyment of any right granted

or protected by this chapter, or to coerce, intimidate, threaten or interfere with such other person for having aided or encouraged any other person in the exercise or enjoyment of any such right granted or protected by this chapter;

(5) For any person, whether an employer or an employee or not, to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this chapter or to attempt to do so."

5. As part of the record, MCAD responded to Father's previous complaint for discrimination against Family Court on 2/28/2022 by directly asserting that:

"It is a violation of M.G.L.c. 272, § 98, to make any distinction, to discriminate, or to restrict a person's access to a place of public accommodation based on race, color, religious creed, national origin, gender, disability, gender identity, and sexual orientation. M.G.L.c. 272, § 92A, defines a place of public accommodation to include 'any place ... which

is open to and accepts or solicits the patronage of the general public.'"

6. G.L.c. 272, § 98, asserts "this right is recognized and declared to be a civil right" and binds the Family Court as just such a "place of public accommodation."

7. Moreover, G.L.c. 272, § 98, affords relief subject to G.L.c. 151B, §5, and it has been established that "In previous cases considering waiver of sovereign immunity under G.L.c. 151B, we concluded that '[t]he Legislature has expressly waived sovereign immunity of the Commonwealth 'and all political subdivisions ... thereof' by including them in the statutory definition of persons and employers subject to [G.L.c. 151B].'" Lopez v. Commonwealth, 463 Mass. 696, 702 (Mass 2012).

8. MCAD also found on 2/28/2022 that "based on the present facts, [Father] fails to articulate a basis for how his national origin creates a reasonable inference of discrimination or nexus to any adverse action implemented by [Family Court]" (see attached).

9. Pursuant to G.L.c. 151B, § 9, Father attempted to remove the MCAD complaint against Family Court to the Middlesex Superior Court. His attempt was denied with



the "this [Superior] Court has no jurisdiction to consider cases in Family Court" ruling on 8/23/2022.

10. Therefore, Father substantiated to this Supreme Judicial Court that "systemic discriminations and sustained conspiracies to silence and enslave targeted fathers (**by cruelly leveraging their dear children**) are behind the State's prohibited yet endlessly renewed retaliatory acts" in his 1,319 pages 5-volume Record Appendices ("RA") submitted on 12/18/2023.

11. Furthermore, Father also asserted in his submitted Status Affidavit On Federal Question Filed With The U.S. Supreme Court on 1/1/2024 that "while [forced] fatherlessness is meaningless for the now 65-year-old millionaire mother, it is crucially meaningful for [Father's] minor children as 'extreme parental alienation [by the State] should be considered emotional child abuse and referred criminally.'"

12. Conclusive proof for the State deploying forced separation and extreme parental alienation of children as sustained statutory (G.L.c. 151B) retaliations came only on 1/10/2024 when the Probation Officer confirmed to Father upon Family Court orders that his dear minor

children felt so alienated and so utterly "fatherless" that they wanted to change even their names. These are Father's "State-owned" children who never had contact with their loving father outside of the agenda-driven and deliberately retaliatory "supervised visitations."

**Discrimination Based On National Origin And Sex**

13. The filed Record Appendices documented that the agenda-driven "activist" and profiteering Family Court had committed "intentional, purposeful discrimination" against Father purely based on inherent attributes:

- a) Father's national origin: "The original 'Father is [a barbaric] Romanian' fabrication (the insinuated reason for the 'Romanian Orphans' tragedy publicized on TV) has been upheld by Family Court since the child-predatory GAL investigation in 2011. Through years of litigation, Father consistently informed that the U.S. had granted him political asylum in 1986 precisely because he was 'not Romanian, not Hungarian, not German, etc.' (as per denials from those countries)," see RA-I:16.

b) Father's sex (or identically gender in Father's parallel cases): "As the biased GALs refused to consider the submitted extensive evidence (e.g., that directly contradicted their existing and boiler-plated 'binary victim' scripts, i.e., 'mother either lacks affect or was bullied into abandoning her 3.5 yo Twins'), the 'superstar' GALs' scheme of stereotypically targeted massive invalidations was obscenely profitable for them at ~\$55K," see RA-I:27.

14. Father consistently complained about the allowed direct "stereotypical" discriminations and the agenda-driven forced "reprogramming" with targeted torture:

"Contrary to the manifested trivializations in Family Court, the Secret Police in communist tyrannies did not formally arrest their targets. They came at night and operated just like the Family Court does by setting traps, resorting to informal house arrests, and using endless psychological torture. And by **leveraging their targets' innocent loved ones.**

This shared activist feminist agenda was

captured during the trials in Family Court:

'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?

[Activist feminist Harvard] GAL: Yes, I do,' see the attached trial transcripts," RA-II:11.

15. Father asserted that the "Family Court's blatant suppression of the truth (and systemic covering for the deeply child-predatory feminist 'activism' of the celebrated 'superstar' Harvard psychology professor and 400 times Mass. GAL and her vast professional 'feeder network') started when two Family Court judges simultaneously 'buried' Father's 100+ pages affidavit, meticulously documenting the GALs 900+ under oath lies, deceptions, and 'activist' manipulations," see Father's "I Can't Breathe" Affidavit On The Crushing Burden Of The State filed on 5/10/2021, RA-I:124.

#### **Retaliation Against A Complaining Father**

16. "Courts commonly use 'retaliation' as shorthand for the more detailed wordings of antidiscrimination statutes such as [G.L.c. 151B] §4(4) and (4A)," Psy-Ed Corp. v. Klein, 459 Mass. 697, 707 n.24 (Mass. 2011).

17. Family Court retaliated directly against Father by forcefully degrading his fatherly bonds with his dear children: Family Court ordered politicized and agenda-driven "indefinite" supervised visitations between Father and even his non-communicative toddler and his newborn, despite the GALs' refusing to consider them.

18. "To make out his prima facie [retaliation] case, Mole had to show that he engaged in protected conduct, that he suffered some adverse action, and that 'a causal connection existed between the protected conduct and the adverse action.'" Mole v. University of Massachusetts, 442 Mass. 582, 591-92 (Mass. 2004).

19. Father substantiated the necessary direct "causal connection" when stating (and proving) that "Directly refuting the maliciously projected activist 'mental health' agenda, Father spared no effort to seek comprehensive psychiatric evaluations from 3 Harvard clinical psychiatrists. The professional tests from superiors of the activist GALs confirmed that Father **'presented no danger to his children, and there was no indication of impairment of his fitness to parent.'** To refute the viciously invalidating projection by the

'feminist' GAL onto Father's 'good' mother, the psychiatric tests included evaluations of Father's parents as well, who had never abandoned their children and had retired in 2004 after working in the U.S. together for the prior 18 years as effective Harvard Medical School scientists." RA-II:13.

20. To conceal the committed original discriminations (based on national origin and sex) and the sustained targeted retaliations against the complaining Father, Family Court also deliberately violated Father's civil rights on 12/5/2013 when denying his relevant evidence and his many qualified witnesses as "No State shall... deny to any person within its jurisdiction the equal protection of the laws," asserts the Equal Protection Clause of the Fourteenth Amendment, see RA-I:48.

21. Family Court also committed mail & wire fraud when neglecting to communicate that 12/5/2013 denial with Father. The objective was to obstruct and sabotage his rights to appeal the deeply discriminatory decisions.

22. In his docketed Civil RICO Class Action Complaint, Father asserted that the 12/5/2013 denial started the now 10-years-long RICO "racketeering activities":

"This complaint refers to allegations of § 1961(1) obstruction of justice (and of state or local law enforcement), mail (and wire) fraud, and retaliation against a victim and informant as the offenses or 'predicate acts' of the RICO racketeering activities... The scheme behind the intent of the Racketeering Activities was to deceive a prepared Father in his affirmed efforts to appeal the Family Court's decisions and conceal from and sabotage any appellate reviews of filed evidence and/or docket entries. Mails and wires (internet and emails) were used to further this deception scheme with 'property in Father's hands.'" RA-I:23.

23. Therefore, the fraudulently ordered "indefinite" supervised visitations regarding all four of Father's children (based on the now substantiated "intent to discriminate") is a direct manifestation of Family Court's subsequent "desire to also retaliate" against a complaining Father, as per "However, the employer's desire to retaliate against the employee must be shown to be a determinative factor in its decision to take adverse action," Psy-Ed Corp. v. Klein, *supra* at 707.

**Rule 60 (b) (6) Fraud On The Court**

24. The thus consistently alleged mail and wire fraud became a Rule 60(b)(6) Fraud On The Court when even this Supreme Judicial Court was (apparently) deceived: "Among [Father's] claims is the contention that he was precluded from seeking review of those orders because one or more of them was not timely entered on the [Family] Court's docket," see SJC-13427 on 8/8/2023.

25. Appealing the SJC's conclusion, Father re-asserted to the U.S. Supreme Court: "However, the uncontested fact that Family Court did not communicate in any way the 12/5/2013 denial to Father remains. Father could not appeal a decision that he could have no knowledge of as its direct consequence. Additionally, the 12/5/2013 denial was not entered on the docket until 7/15/2014. This means that Father unequivocally could not have received the 'nonexistent' 12/5/2013 ruling (itself a material fact) in a timely manner or at all (the factual reality)," see No. 23-5932 or RA-III:30.

26. SJC-13427 also noted on 8/8/2023: "To the extent [Father] contends that the docketing of any order was delayed and that the appellate period lapsed in the



interim, a motion under Mass. R. Civ. P. 60(b)(1) or (6) may provide a remedy." Mass. R. Civ. P. asserts, "The motion shall be made within a reasonable time," and clarifies, "The saving clause [i.e., (6),] in Rule 60(b) which allows the court to set aside a judgment for fraud upon the court contains no time limit."

27. On 2/28/2022, as attached, MCAD dismissed Father's complaint for discrimination by noting, "Investigating this matter would require a review of [Family Court's] processes and handling of matters... none of which is appropriately within the purview of the Commission."

28. The MCAD restrictions certainly do not apply to this Supreme Judicial Court in the herein context of Father's current Emergency Petition To Correct And Prevent Ongoing Errors Pursuant To G.L.c. 211, § 3.

29. Moreover, the discriminations and retaliations reported to MCAD in 2022 were implicitly renewed in the Family Court hearing on 12/12/2023. The mother of Father's minor children testified that the children felt "fatherless." Upon hearing her verbal testimony, Father had no reason to doubt his children's feelings.

30. Father reiterated the underlying facts in his 1/1/2024 open letter addressed to President Biden:

"I have never communicated with my younger children without the State's supervision. The State has never raised a complaint against me during my **500+** supervised visits with them. I have repeatedly complained to the State about the forceful supervision's activist agenda. I have never abandoned my children. Despite my **1,360+** calls, they could never respond."

31. Family Court could not reprogram the whistleblower Father from complaining. The agenda-driven retaliatory orders forcefully "reprogrammed" his children instead while deliberately defrauding the state (and now also federal) judicial processes and our rule of the law.

32. Father has substantiated that "The State publicly seeks to maximize federal reimbursements (despite potential harm and injury to taxpayers)... Competing against all other states, this can be accomplished only by (1) targeting families with more resources, (2) maximizing each support amount by forcefully and fully separating children from their nonresident

parents, (3) allowing fabrications of 'high conflicts' into the cases only to incentivize the 'feeder network' of colluding professionals, (4) hiding the thus induced legal struggle by 'cooking' docket records, and (5) concealing any wrongdoing with protecting schemes from discovery, or appeals, and federal penalty inducing corrections," RA-I:21.

33. Consequently, Father turned to the U.S. Supreme Court, No.23-6398, with the substantiated question:

Does sovereign immunity apply to an "LGBTQ+" Massachusetts when using federal funds to subsidize the forceful separation and activist-agenda-driven alienation of innocent American children from their loving American parents?

#### **Interference With Protected Rights**

34. Father has asserted that "Through 20+ hearings (since 2018 when [his] forced indigency started), Family Court rejected all of [his] evidences regarding supervised visitations, even denying his sole trial exhibit about how he had to voluntarily end the visits to protect his crying little children," RA-I:175.

35. Moreover, "[G.L.c. 151B,] § 4(4) addresses action taken by 'any person' against 'any person,' while § 4(4A) concerns actions taken by 'any person' against 'another person.' In neither case does the statute expressly require that an employer-employee relationship exist at the time of the wrongful conduct or at any other time. In light of the ... broad remedial purposes, it would be an error to imply such a limitation where the statutory language does not require it. See G.L.c. 151B, § 9, (G.L.c. 151B to be 'construed liberally for the accomplishment of its purposes')," Psy-Ed Corp. v. Klein, *supra* at 708.

36. Father substantiates his claims of interference as he has repeatedly reported, "Continually deceiving about Father's relationship with his Twins, Mother-B also instructed Family Court to order Father not to contact his children. As [he] has been unsuccessfully attempting to call his children (1,360 times already), Mothers' controlling actions underscore their stated goal of a sadistically destroyed parental bond between Father and his [four dear] children," RA-I:175.

37. G.L.c. 151B, § 9, applies to Family Court, i.e., "Any person claiming to be aggrieved by a practice made unlawful under this chapter... may, at the expiration of ninety days after the filing of [an MCAD] complaint..., but not later than three years after the alleged unlawful practice occurred, bring a civil action for damages or injunctive relief or both in the superior or probate court for the county in which the alleged unlawful practice occurred."

38. As attached, Father asserts and reiterates that:

"Father submitted his parallel complaints for modifications on 10/1/2022. [Family Court] permitted [his] complaints to be filed and summonses issued on 11/17/2022. Before serving the summonses, Father repeatedly requested permission to amend his complaints on 11/27 and 12/12/2022 while also submitting his Amended Complaints For Modifications Pursuant To [G.L. c. 151B] Employment Discrimination... [Family Court] ignored Father's substantiated (with 386 pages of relevant exhibits) amendments. Father refiled his requests for permissions and [his]

amended complaints on 3/13/2023. During the 3/23/2023 hearings, the Defendants confirmed receiving the summonses with the attached amended complaints and exhibits, yet [Family Court] continued ignoring them. Father refiled his requests for permission to file and the substantiated amended complaints again on 9/6/2023. [Family Court] continued to ignore Father's amendments [pursuant to G.L.c. 151B]."

39. Father asserted in his herein petition that "In his consistent filings, Father observed that the objective of the now systemically applied *ad hoc* 'gatekeeper orders' against Father is to conceal the allowed fraudulent GAL investigations and subsequent specific and systemic 'disparate treatments' against Father by Family Court and the colluding parties."

40. Father concludes that the **secretive "gatekeeper orders"** are the effective means for Family Court to deliberately "interfere with [Father] in the exercise or enjoyment of any right granted or protected by this chapter... or interfere with [the Mothers] for having aided or encouraged [silencing (and enslaving) Father]

in the exercise or enjoyment of any such right granted or protected by this chapter," G.L.c. 151B, §4(4A).

41. Specifically, "among the rights protected by G.L. c. 151B is the right to be free from discrimination in the terms, conditions, and privileges of employment," Lopez v. Commonwealth, *supra* at 707 (also see below).

#### **Defamation To Forced Indigency To Jail Sentence**

42. Unlike a retaliation claim, defamation does not require discriminatory intent. Nevertheless, Father's separate complaint for defamations against the Mothers was dismissed based on the two Mothers' deliberately false representation that "all of the alleged false statements by defendants occurred in the litigation context," despite the specific supervised visitations occurring entirely outside of any "judicial process."

43. "To prevail on a claim of tortious interference with a contract, a plaintiff must establish '(1) he had a contract with a third party; (2) the defendant knowingly induced the third party to break that contract; 3) the defendant's interference, in addition to being intentional, was improper in motive or means;

and (4) the plaintiff was harmed by the defendant's actions,' " Psy-Ed Corp. v. Klein, *supra* at 715-16.

44. In the attached Amended Complaint For Modification Due To Defamation filed on 1/9/2024 (and its exhibits filed on 3/18/2021 in the Middlesex Superior Court), Father addressed all four conditions of the above claim of "tortious interference with a contract."

45. The original 2011 fraud and discrimination against Father in Family Court provided the means for the two Mothers' now substantiated "mental health" defamation in 2014. This predictably and directly resulted in Father's fully depleted finances by 2018. Father has consistently complained about his thus **deliberately induced forced indigency** since the 2/12/2018 hearings.

46. Family Court still allowed the Mothers' endlessly renewed complaints for contempt to be filed against Father, which resulted in his arrest & jail sentence.

47. "'Sham' litigation, at least in the antitrust context, is litigation that is 'objectively baseless in the sense that no reasonable litigant could realistically expect success on the merits,' and also is subjectively motivated by the litigant's desire to



use the governmental process – as opposed to its outcome – to influence or harm the target of the litigation,” Psy-Ed Corp. v. Klein, *supra* at 709.

48. Consequently, Father concludes that the repeatedly allowed complaints for contempt were simultaneously G.L.c. 151B interferences and retaliations as neither the Mothers nor Family Court could conceal the direct result of Father’s forced indigency: Father’s concrete (and endlessly accumulating) in-arrears court-ordered obligations for his four children reaching **\$365,000+**.

49. “Where the alleged retaliatory act is the filing of a lawsuit, however, the scope of [G.L.c. 151B,] §4(4) and (4A) are bounded by State and Federal constitutional rights to seek judicial resolution of disputes... But the ‘right to petition is not . . . an absolute right.’ The filing of ‘sham’ or ‘baseless’ litigation, as distinct from ‘unsuccessful but reasonably based suits,’ is not a constitutionally protected right,” Psy-Ed Corp. v. Klein, *supra* at 709.

#### **Aiding And Abetting Employment Discrimination**

50. To complete the children’s “reprogramming,” Family Court had to allow a thus forcedly indigent Father to

attend the 12/12/2023 hearing. Therefore, Family Court accepted that the **1,850+** job applications submitted in compliance with the obsessive "seek work" orders could never secure employment for Father in the context of his in-arrears support obligations reaching \$365,000+.

51. This substantiates Father's allegations that the endlessly allowed frivolous complaints for contempt by the mothers were the foundation of the Family Court's conspiracy to "silence and enslave" the vocal Father.

52. The complaints for contempt conveniently justified the impossible "seek work" orders while deliberately aiding and abetting **total employment discrimination** against Father in the context of the Family Court's "main" discrimination (based on his national origin and sex) and the sustained retaliations by the agenda-driven, fraudulently ordered "indefinite" supervision.

53. The law is satisfied as "To prevail on an aiding and abetting claim under [G.L.c. 151B,] § 4(5), a plaintiff must show (1) that the defendant committed 'a wholly individual and distinct wrong separate and distinct from the claim in main'; (2) 'that the aider or abetter shared an intent to discriminate not unlike

that of the alleged principal offender'; and (3) that 'the aider or abetter knew of his or her supporting role in an enterprise designed to deprive [the plaintiff] of a right guaranteed him or her under G.L.c. 151B,'" Lopez v. Commonwealth, *supra* at 713.

54. Father (a skilled software engineer) asserts in his Amended Complaint For Modifications that "[he has] complied with Family Court's 'seek work' orders [by submitting 1,850+ compliant job applications. Yet,] the feedback received from employers is crystal clear: 'You are not judged on technical merits by engineers; you are judged purely on legal merits (and risks) of your open lawsuits, and only by lawyers.'" This fact satisfies the "an aiding and abetting claim under § 4(5) requires the defendant to act in concert with one or more specific employers to 'aid' or 'abet' a primary and independent act of discrimination by those employers." Lopez v. Commonwealth, *supra* at 714 n.23.

55. Moreover, "Unlike [G.L.c. 151B,] § 4(1), which by its terms prohibits discrimination by employers, [Family Court] need not be an employer to be subject to an interference claim under § 4(4A) ... That

provision 'independently and explicitly provides for an interference claim, not merely against employers, but against all person[s],'" Lopez v. Commonwealth, supra at 706. Therefore, the "seek work" orders (in the context of prior discriminations, retaliations, defamations, and the concealed Rule 60 Fraud On The Court, etc.) also count as G.L.c. 151B interference.

#### **Status Updates And Respectful Request**

56. Father could not claim the deliberate G.L.c. 151B discriminations, retaliations, and interferences in any of his filed federal complaints as "the Eleventh Amendment to the United States Constitution bars State law claims against State officials in Federal court," Lopez v. Commonwealth, supra at 698 n.3.

57. Father's Civil RICO Class Action Complaint was dismissed sua sponte in the U.S. District Court on 12/21/2023. In his filed appeal (see attached) of the hasty dismissal, Father will argue that "Reasoning that Title VII was intended to prohibit employers 'from exerting any power [they] may have to foreclose, on invidious grounds, access by any individual to employment opportunities otherwise available to him,'

the court concluded that the statute did not contemplate providing protections only in those situations where there was a direct employment relationship between the plaintiff and defendant, i.e., that of 'an employee of an employer.' The court held that, although the defendant was not the plaintiff's 'actual or potential direct employer,' the complaint alleged sufficient facts to state a claim against one 'who control[s] access to employment and who den[ies] access by reference to invidious criteria,'" Lopez v. Commonwealth, *supra* at 703.

58. Accordingly, continued systemic discrimination and statutory retaliation against Father by the conspiring and obstructing State are sufficient facts for a claim against the one "who controls access to employment and who denies access by reference to invidious criteria."

59. Pursuant to "an aggrieved person may also seek temporary injunctive relief in the superior or probate court within such county at any time to prevent irreparable injury during the pendency of a complaint with the commission," G.L.c. 151B, § 9, Father is filing motions for injunctive relief in Family Court.

60. Father extends his herein petition by respectfully requesting a "speedy trial" in this Court pursuant to "an action filed pursuant to this section shall be advanced for a speedy trial at the request of the petitioner. If the court finds for the petitioner, it may award the petitioner actual and punitive damages. If the court finds for the petitioner it shall, in addition to any other relief and irrespective of the amount in controversy, award the petitioner reasonable attorney's fees and costs unless special circumstances would render such an award unjust," G.L.c. 151B, § 9.

Signed under the pains and penalties of perjury.

January 13, 2024,

Respectfully submitted,

/s/ Imre Kifor

Imre Kifor, Pro Se

Newton, MA 02464

[ikifor@gmail.com](mailto:ikifor@gmail.com)

I have no phone

I have no valid driver's license

I have to move to a homeless shelter

<https://femfas.net>