

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

IMRE KIFOR,
Plaintiff-Appellant,

CIVIL ACTION
No. 24-1075

v.

THE COMMONWEALTH OF MASSACHUSETTS,
GOVERNOR MAURA HEALEY (official capacity),
ATTORNEY GENERAL ANDREA CAMPBELL
(official capacity), COMMISSIONER GEOFFREY
SNYDER (official capacity, Department of Revenue,
Child Support Enforcement Division), MIDDLESEX
PROBATE & FAMILY COURT, THE COUNSELING
CENTER OF NEW ENGLAND (now LIFESTANCE
HEALTH, INC.), ATRIUS HEALTH, [REDACTED],
[REDACTED],
Defendants-Appellees.

**PLAINTIFF-APPELLANT’S MOTION FOR LEAVE TO FILE THE
ATTACHED MOTION FOR AN INJUNCTION AND A DECLARATION
SUPPORTED BY HIS SUBSTANTIATED MEMORANDUM OF LAW**

NOW COMES the Plaintiff-Appellant, Imre Kifor (“Father”), and states:

- 1) Pursuant to the Massachusetts Supreme Judicial Court (“SJC”) order on 9/6/2024 for docket No. SJ-2024-M026, i.e., “The court will grant leave if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim,” Father has diligently assembled and e-filed his meticulously collected (and preserved on 5,514-pages) “SJC Record” with the SJC and with this U.S. Court Of Appeals, simultaneously and identically.

- 2) On 11/5/2024, the forcedly indigent Father also demonstrated in the Middlesex Superior Court, docket No. 2481CV00983, that he is now openly bullied into discarding or **outright erasing** his own meticulously preserved evidence before being allowed to e-file his pleadings and affidavits in the Massachusetts courts.
- 3) Moreover, Father's attached "Memorandum Of Law In Support Of Motion For An Injunction Against The Commonwealth Defendants And For A Declaration That The Marxist-Inspired 'Equity For All' Deception Is Unconstitutional" also substantiates that the Commonwealth Defendants ("State") has now manifestly split into an ignored (but benevolent) "DEI layer" and a nameless and ruthlessly discriminating "Administrative Deep State." The two clearly delineated sides of a still vindictive State (with Marxist and Stalinist-inspired "absolute immunity") directly contradict each other and are subject to an immediate judicial estoppel.

WHEREFORE, Father respectfully requests that this Court grant Father a leave to file his "Motion For Injunction Against The Manifestly Vindictive Commonwealth Defendants And For Declaration That President Biden's Marxist-Inspired 'Equity For All' Blatant Deception Is Unconstitutional" attached herein with its supporting memorandum diligently substantiated with carefully preserved relevant evidence.

Signed under the pains and penalties of perjury.

November 12, 2024,

Respectfully submitted,
/s/ Imre Kifor
Imre Kifor, Pro Se

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I have no phone

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CENTER OF NEW ENGLAND (now LIFESTANCE
HEALTH, INC.), ATRIUS HEALTH, [REDACTED],
[REDACTED],
Defendants-Appellees.

CIVIL ACTION
No. 24-1075

**PLAINTIFF-APPELLANT’S MOTION FOR INJUNCTION AGAINST THE
MANIFESTLY VINDICTIVE COMMONWEALTH DEFENDANTS AND
FOR DECLARATION THAT PRESIDENT BIDEN’S MARXIST-INSPIRED
“EQUITY FOR ALL” BLATANT DECEPTION IS UNCONSTITUTIONAL**

NOW COMES the Plaintiff-Appellant, Imre Kifor (“Father”), and states:

- 1) Pursuant to the Massachusetts Supreme Judicial Court (“SJC”) order on 9/6/
2024 for docket No. SJ-2024-M026, i.e., “The court will grant leave if [Father]
demonstrates that he has no other adequate remedy and provides the court with
a record to substantiate his claim,” Father has diligently assembled and e-filed

his meticulously collected (and preserved on 5,514-pages) “SJC Record” with SJC and this U.S. Court Of Appeals (“USCA1”), simultaneously & identically.

- 2) On 11/5/2024, the forcedly indigent Father also demonstrated in the Middlesex Superior Court, docket No. 2481CV00983, that he is now openly bullied into discarding or **outright erasing** his own meticulously preserved evidence before being allowed to e-file his pleadings and affidavits in the Massachusetts courts.
- 3) Moreover, Father’s attached “Memorandum Of Law In Support Of Motion For An Injunction Against The Commonwealth Defendants And For A Declaration That The Marxist-Inspired ‘Equity For All’ Deception Is Unconstitutional” also substantiates that the Commonwealth Defendants (“State”) has now manifestly split into an ignored (but benevolent) “DEI layer” and a nameless and ruthlessly discriminating “Administrative Deep State.” The two clearly delineated sides of a still vindictive State (with Marxist and Stalinist-inspired “absolute immunity”) directly contradict each other and are subject to an immediate judicial estoppel.
- 4) In his attached open letter/affidavit to President-Elect Trump, titled **“Forced Fatherlessness Is The Manifested Objective Behind The Child-Predatory ‘Feminism’ And Profiteering ‘LGBTQ+’ Dual Discrimination Schemes In Today’s Agenda-Driven Massachusetts,”** Father also summarizes his prior claims that President Biden’s Executive Order, dated 2/16/2023, has a pressing logical fallacy and the core “equity for all” blatant deception must be corrected, as a logically unacceptable conclusion, to a less deceitful “equity for some.”

- 5) Father's repeated complaints to the various federal agencies, e.g., EEOC, Office of Federal Operations (OFO), U.S. Departments of Health and Human Services, and Labor, NLRB, and ultimately the DOJ, have all been immediately rejected, apparently due to President Biden's discriminating order to effectively erase all complaints for disparate treatment by the now confirmed (personally by a mad or just sneering President Biden) **"garbage" half of the American population.**
- 6) Moreover, the DOJ, Civil Rights Division, emailed Father on 10/21/2024, "We are not determining that your report lacks merit. Rather, another federal agency may be able to help in your situation," and then, incapacitated by the routinely fabricated Marxist-inspired ambiguities and inconsistencies, blindly proceeded to instruct Father to simply restart his endless Stalinist-style "guilty until proven innocent" vicious circles and go back to continue idly complaining to the above federal agencies only to be "discarded as Biden's garbage" time and time again.
- 7) Directly contradicting the substantiated record, the State also confirmed in their submission to the Middlesex Superior Court on 8/6/2024 that Father's claims of sustained and systemic disparate treatments (including deliberate Title VI/VII of the Civil Rights Act of 1964 violations) committed by the agenda-driven State are acts protected by the State's "absolute judicial or prosecutorial immunities."
- 8) In his to-be-reviewed Civil RICO Class Action Complaint, Father stated, "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 RICO racketeering activities.”

- 9) Nevertheless, the State continues to claim that the now substantiated sustained mail fraud, the falsified Family Court dockets, and the deliberate discarding of evidence or outright erasure of motions, affidavits, notices of appeal, etc. (only to obstruct and interfere with, i.e., conceal the otherwise diligently documented disparate treatments) were protected by some “judicial immunity” when in fact they were committed in the absence of jurisdiction as judicial estoppel applies.
- 10) Moreover, the State claimed on 10/30/2024, “Additionally, [Father] has not met his burden to establish that imminent irreparable harm will befall him in the absence of an injunction... Rather, a straightforward remedy is available... he may simply ‘file [] a motion in the [Family Court] to direct the clerk of that court to take any appropriate steps to prepare the record or correct the docket.’”
- 11) However, as already established since 10/14/2024, the Middlesex Probate And Family Court (“Family Court”) continues to refuse to docket even Father’s e-filed and timely opposition (supported by his affidavit and extensive relevant evidence) to a maliciously biased and otherwise hateful anti-immigrant motion.
- 12) As the thus committed predicate acts of RICO racketeering activities support Father’s assertion that “no remedy for discrimination is ever possible if the evidence is deliberately discarded or erased by the perpetrators themselves,” they also simultaneously violate: “[Title VI, which] prohibits discrimination

based on race, color, and national origin in programs and activities receiving federal financial assistance” and “Title VII also makes it unlawful to use policies or practices that seem neutral but have the effect of discriminating against people because of their race, color, sex,... or national origin.”

WHEREFORE, Father respectfully requests this Court to a) enjoin the child-predatory “feminist” and profiteering “LGBTQ+” agenda-driven State from discriminating against the significant number of immigrant men by either inciting the “ignorant illegals” into violating federal law or effectively discarding the legal immigrant men as mere “Biden’s garbage” by outright erasing their evidence and systemically nullifying their complaints and b) declare that President Biden’s 2/16/2023 Executive Order is unconstitutional as it deceptively intends to foster the above discrimination by the states against the predominantly male immigrants.

Signed under the pains and penalties of perjury.

November 12, 2024,

Respectfully submitted,
/s/ Imre Kifor
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Defendants-Appellees.

CIVIL ACTION
No. 24-1075

**PLAINTIFF-APPELLANT’S MEMORANDUM OF LAW IN SUPPORT OF
MOTION FOR AN INJUNCTION AGAINST THE COMMONWEALTH
DEFENDANTS AND FOR A DECLARATION THAT THE MARXIST-
INSPIRED “EQUITY FOR ALL” DECEPTION IS UNCONSTITUTIONAL**

NOW COMES the Plaintiff-Appellant, Imre Kifor (“Father”), and states:

- 1) Father submitted his attached “Plaintiff’s Memorandum Of Law, Facts, And Precise Timeline In Support Of Combined Reply To Defendants’ Oppositions To Relief” to the Middlesex Superior Court, docket No. 2481CV00983, on 11/5/2024.
- 2) The substantiated text of the memorandum effectively and identically applies to this matter as well, and Father is hereby incorporating herein the text in its entirety.

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Signed under the pains and penalties of perjury.

November 12, 2024,

Respectfully submitted,

/s/ Imre Kifor

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COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT

MIDDLESEX, ss.

SUPERIOR COURT

IMRE KIFOR, Plaintiff, v. THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALEY (official capacity), ATTORNEY GENERAL ANDREA CAMPBELL (official capacity), COMMISSIONER GEOFFREY SNYDER (official capacity, MA DOR CSE), MIDDLESEX PROBATE AND FAMILY COURT, ██████████ ██████████, ██████████ Defendants.	
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Case No: 2481CV00983

**PLAINTIFF’S MEMORANDUM OF LAW, FACTS, AND PRECISE TIMELINE IN
SUPPORT OF COMBINED REPLY TO DEFENDANTS’ OPPOSITIONS TO RELIEF**

NOW COMES the Plaintiff, Imre Kifor (“Father”), and respectfully states/reiterates as follows:

- 1) The Massachusetts Supreme Judicial Court (“SJC”) has repeatedly ordered Father to “create a record,” i.e., substantiate his claims of the Defendants’ sustained & systemic disparate treatment against him step-by-step with his meticulously preserved and relevant evidence. Starting on 8/5/2024, Father has diligently assembled a 5,514-page “SJC Record” under docket SJ-2024-M026.
- 2) In his “Petition To Correct And Prevent Ongoing Errors Pursuant To G.L.c. 211, § 3, And Due To List Of G.L.c. 151B Disparate Treatments And Deliberate Title VI/VII Violations Committed By The Agenda-Driven State,” Father asserted: “Therefore, the above three key events prove that a) disparate treatments exist, b) they extend back to 5/2/2011, and c) sabotaging of appeals was committed specifically to obstruct justice (e.g., the reviewing of the denials of the motions for

relief from judgment pursuant to Rule 60 fraud on the court) and, thus, any ‘prior final judgment on the merits’ is invalidated. The concerted effort to sabotage Father’s appeals (and then conceal the sabotaged appeals) is a clear manifestation that the State is not comfortable with the Appeals Court (or this SJC) reviewing the raised (and now duly documented) Marxist-inspired and purely equity-based ‘guilty until proven innocent’ agenda. In [his record], Father referred to the agenda as the ‘**LGBTQ+ discrimination scheme**’ as it targets, for ‘maximized’ federal reimbursements, the ‘leftover’ simple men (i.e., fathers) excluded from all ‘LGBTQ+’ protections (despite blatant civil rights violations). Father reiterates that the ‘LGBTQ+’ label usage has nothing to do with the actual minorities, as it refers to the never-protected and implicit ‘leftovers’: Nevertheless, to solve [Russell's Paradox](#)¹ (carelessly introduced by the naive enumeration of the purposely non-inclusive ‘LGBTQ+’ alphabet soup of ‘specially protect from others’ groups without mentioning the also always inherently present mere ‘leftovers’), the deliberately deceitful ‘equity for all’ must be corrected to a mere ‘equity for some,’ in a direct contradiction with our... Constitution.”

3) In an attempt to address the deficiency cited by the U.S. Supreme Court on 2/2/2024, “Under Article III of the Constitution, the jurisdiction of this Court extends only to the consideration of cases or controversies properly brought before it from lower courts in accordance with federal law and filed pursuant to the Rules of this Court,” Father’s SJC Record specifically incorporates and reiterates his claims already diligently substantiated for SCOTUS (No. 23-5932), i.e., “The ‘Sec. 8. Affirmatively Advancing Civil Rights ... to prevent and address discrimination and

¹ See <https://plato.stanford.edu/entries/russell-paradox/>.

advance equity for all' clause of the [2/16/2023 Presidential Executive Order](#)² results in Russell's Paradox, and it must be corrected as a logically unacceptable conclusion to a less deceitful 'equity for some.' Is the mandate to selectively 'advance equity' (for only some) Constitutional?"

4) Apparently, on 10/30/2024, even President Biden himself referred to this "leftover" class of millions of Americans, i.e., the ones who would never be able to vote in clear conscience for the deeply child-predatory "feminist" & profiteering "LGBTQ+" politicians, as "[Biden's Garbage](#)"³.

5) Father has been and continues to be strictly apolitical. Nevertheless, in the legal context of his diligently assembled SJC Record, he concedes that Marxist activists could view him as "Biden's Garbage" and continue to discard Father, i.e., his meticulously preserved evidence, accordingly.

6) Father specifically pointed to this possibility (as a substantiated reality) in his SJC Record on 10/14/2024. In his SJC "Motion For Relief From Judgments Pursuant To Rule 60 Fraud On The Court Continuously Committed With The Assistance From The Attorney General's Office," Father requested that "[the SJC] declare that [his] submitted 'record' (to substantiate his claims) is now complete and that [the SJC's] conditions are satisfied, as **no remedy for discrimination is ever possible if the evidence is deliberately discarded by the perpetrators themselves.**"

7) Father then diligently supplemented his SJC Record with his 2-volume (or 431 + 351 pages long) "Supporting Affidavit And Created Record To Substantiate Claims Of Systemic 'Rule 60 Fraud On The Court Continuously Committed With The Assistance From The Attorney General's Office'" on 10/22/2024. By noting "Pleadings too large for processing. Please file hard copies

² See <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/02/16/executive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

³ See <https://www.cnn.com/2024/10/30/politics/kamala-harris-joe-biden-garbage-comment/index.html>.

with the Clerk's Office" on 10/23/2024, this Superior Court rejected Father's e-filing of his preserved and relevant evidence against the Massachusetts Attorney General's Office ("AGO").

8) Consequently, Father is hereby attempting once again to incorporate herein his meticulously collected and diligently assembled SJC Record of **a Marxist agenda-driven AGO discarding his 174 complaints (and/or desperate messages) on purpose as mere "garbage"** (see the attached 3-volume "Record Appendix To Substantiate Claims Of Systemic 'Rule 60 Fraud On The Court Continuously Committed With The Assistance From The [AGO]'"). By respectfully reiterating, Father notes that he has no means to physically transport himself to the courts nor funds to re-mail his extensive evidence, only to be immediately discarded time and time again.

9) Specifically, Father reiterated (and diligently substantiated with the preserved "Thank you for contacting the Office of Attorney General Maura Healey..." email responses) in his SJC Record:

Father's first confirmed submission to the AGO was his email on 2/13/2018 (see addendum). In it, Father attached his "03-Court.pdf," "04-Judge.pdf," and "05-FBI.pdf" documents, specifically listing "Defendant's Renewed Motion For Relief From Judgments" that he had filed with the Family Court and emailed to the clerk. In the documents, Father specifically alleged that [Respondents ██████████ ("Mother-B"), ██████████ ("Mother-C"), and Family Court have been targeting Father with disparate treatment based on sex, gender, and national origin since the inception of the dual lawsuits on 5/2/2011. The Family Court dockets still reflect on 10/21/2024 that, while Mother-B also filed an opposition to Father's motion for relief on 2/6/2018, the entire exchange regarding the question of "clear abuse of judicial discretion" (of all prior rulings) in the MI07D3172DV1 docket has been discarded and erased. Nevertheless, the Mother-B docket's downloadable 7/26/2018 entry repeats

(without providing evidence) the anti-immigrant projections, i.e., “[Father] now claims that he has no money, no income, no assets. Indeed, he repeatedly disposed of assets during the litigation for less than their actual value, then claimed he was harmed. It is believed that he has hidden assets with his parents, who have returned to Romania.” Evidence for the Family Court receiving both Father’s properly filed motion for relief and Mother-B’s clear anti-immigrant opposition comes from Mother-C’s docket MI11W0787WD, from where Father was able to download the “02/12/2018 Opposition to Defendant's Renewed Motion for Relief from Judgments” entry on 10/21/2024. While Mother-C has been endlessly claiming that “[Father] brings in information from another case involving a different family here. Whatever has happened in a case that does not involve [Mother-C] needs to be stricken. There is no ambiguity. The Court has been clear that in THIS case, Father IS in Contempt of the Court. Until [Mother-C] receives notice otherwise or until she's served to partake in another family's case, this is irrelevant,” even on 10/15/2024 [see attached addendum], the MI11W0787WD docket still reflects on 10/21/2024 that Mother-B’s clear anti-immigrant bias and hatred, as mere projections without any evidence, have been directly transferred to and specifically adopted by the somehow “irrelevant” Mother-C matters. In fact, as another deliberate mail fraud, the “10/01/2018 Motion For Relief From Judgment DENIED on 08/24/2018 File Reference #119, Judge: Black, Hon. Mary” entry from Mother-C's MI11W-0787WD docket is still “secret” on 10/21/2024, i.e., it has never been communicated with Father and still cannot be downloaded. Clear evidence for the Family Court’s continued and systemic discarding (and erasing) of Father’s not just evidence but proper and timely filed pleadings as well also comes from Mother-C’s MI11W0787WD docket. The attached

downloaded “03/09/2018 Motion For permission to publish DENIED on 02/12/2018 File Reference #114, Judge: Donnelly, Jr., Hon. Edward F” entry on 10/21/2024 inadvertently shows a copy of Father’s “Defendant’s Renewed Motion For Relief From Judgments,” signed on 1/19/2018, just as filed (and then discarded) for Mother-B’s MI07D3172DV1 docket. Despite the clear fraud, i.e., the deliberately and systemically falsified Family Court dockets (only to conceal the long-term and unlawful disparate treatment against a legal immigrant Father), Mother-C continues to actively maintain (even today) claims docketed on 7/26/2018, i.e., “Lastly, evidence does not support that there has been fraud on the Court by anyone other than Father himself and as the inflictor of damages, Father does not deserve monetary compensation.” Directly contradicting Mother-C’s now established anti-immigrant bias and outright hatred regarding the sustained and systemic Rule 60 fraud on the court, her other docket, MI11W1147WD, is the now manifested proof of Father’s claims of deliberate discarding and erasing his pleadings and evidence by Family Court as it still has no records whatsoever of any of Father’s [above] pleadings, otherwise docketed in the parallel dockets.

10) Therefore, the AGO’s rejection, i.e., “Please be advised that after reviewing your complaint, the Civil Rights Division has decided not to further investigate or intervene in this matter at this time,” on 10/21/2024 of Father’s complaint for manifested G.L.c. 272, § 98 discriminations/civil rights violations (based on his sex, gender, and national origin), involving a literal 5 minutes of competent effort in reviewing the very first submissions by him to the AGO (complemented by simply accessing the relevant and publicly available Family Court dockets), is a now direct proof for the AGO consistently refusing to consider or investigate any NON-“feminist” and/or NON-“LGBTQ+” discrimination complaints, even involving otherwise “protected classes” of males.

11) Specifically, as further direct evidence of the sustained and systemic “discrimination in a public place” allowed to continue by the AGO, Father points to Mother-C’s manifestly biased & outright hateful anti-immigrant e-filings allowed to be docketed without evidence on 10/10 and 14/2024 while Father’s secretly-demanded “permissions” to e-file his extensively substantiated proper and timely opposition and his 24-page affidavit (with the attached 485 pages of evidence) are effectively “parked” on the sidelines as mere “an immigrant’s garbage” by the Family Court.

12) Consequently, the AGO’s continued acts to collude with the now manifested “silencing and enslaving” of Father are thus G.L.c. 151B, §4(4) retaliations, (4A) interferences, and (5) aiding and abetting employment discriminations by the AGO, just as he has already claimed to MCAD.

13) Father notes that his combined in-arrears obligations for his four children (accumulated since Father first emailed the AGO on 1/12/2018; see his “Castrating young American boys?” email) have now reached a manifestly intractable **\$415,000+** level (with both IRS & DOR confirming an “uncollectible” status). As a direct consequence of the purposely fabricated and deliberately induced staggering “federal felony,” no employer will even consider “screening in” Father’s now **2,280+** compliant (monitored for 2 years by Family Court) and diligent weekly job applications.

14) Refuting the Commonwealth Defendants’ repeatedly raised “absolute judicial/prosecutorial immunity” theory, Father first reiterates the now crystalized core controversy of the matters, i.e.,

Father’s specifically assembled SJ-2024-M026 docket provided the explicit guidance for the AGO to review the Family Court’s continued targeting of Father based on his national origin, i.e., as per [Mother-B’s] submission on 2/6/2018, ‘If there has been any fraud perpetrated upon this [Family] Court it has been by [Father]. It is likely that [he] has hidden his assets and money and perhaps with his parents who, upon information and belief, have returned to

Romania where they previously enjoyed an upper-class lifestyle & continue to own property.’

Father reiterates that he and his family were granted political asylum by the U.S. in 1986 and has not held any assets in (or connections with) Romania since then. Moreover, as a legal immigrant, he has no means to “prove the negative,” i.e., that he has NO foreign assets...

15) As both Mother-B and Mother-C knew from day one that Father and family had left nothing behind when emigrating from Romania in 1986, they were also aware that the IRS, DOR, and all the courts had access to his entire net worth, as per “The maxim ‘he who comes into equity must come with clean hands’ closes the doors of a court of equity to one tainted with inequity or bad faith relative to the matter in which he seeks relief, however improper may have been the behavior of the defendant,” Precision Co. v. Automotive Co., 324 U.S. 806, (1945).

16) Through his consistently filed affidavits of indigency, Father diligently attested in all courts since 2019 that he has no assets, money, property, etc., left anywhere inside (or outside) the U.S.

17) Other than immigrants, no other U.S. citizen can be credibly targeted in court with either “he has a passport” or “he has hidden Romanian assets” without immediately furnishing some proof.

18) Consequently, Father is a genuine member of the “discriminated against based on national origin” group, i.e., the explicitly protected class in all state & federal anti-discrimination statutes.

19) Therefore, the Commonwealth Defendants’ claim that he “appears to be relying on his recent baseless MCAD complaint” is a further manifestation that the AGO is continually colluding and deceiving only to misrepresent the record of Father’s 174 complaints to the AGO as “garbage.”

20) Moreover, Father is entitled to a preliminary injunction during the pendency of his reiterated MCAD complaints as he has now established the necessary elements of a preliminary injunction.

21) Specifically, Father has shown “(1) a likelihood of success on the merits (see the SJC’s 9/26/2024 order, “The court will grant leave if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim” with a denial/dismissal by this Superior Court being that specific proof); (2) that irreparable harm will result from denial of the injunction (i.e., see below, as “no remedy for discrimination is ever possible if the evidence is deliberately discarded by the perpetrators themselves”); and (3) that, in light of the [Father’s] likelihood of success on the merits, the risk of irreparable harm to the [Defendants] outweighs the potential harm to the [Defendants] in granting the injunction (see judicial estoppel below).”

The Equitable Doctrine Of Judicial Estoppel

22) “Judicial estoppel is an equitable doctrine that precludes a party from asserting a position in one legal proceeding that is contrary to a position it had previously asserted in another proceeding,” Blanchette v. School Committee of Westwood, 427 Mass. 176, 184 (Mass. 1998).

23) “We have, however, long adhered to the principle that ‘[a] party who has successfully maintained a certain position at a trial cannot in a subsequent trial between the same parties be permitted to assume a position relative to the same subject that is directly contrary to that taken at the first trial’ (citations omitted). Judicial estoppel goes beyond that principle, and a party in the second action may rely on judicial estoppel, even though not a party in the first action,” East Cambridge Savings Bank v. Wheeler, 422 Mass. 621, 623 (Mass. 1996).

24) “As an equitable doctrine, judicial estoppel is not to be defined with reference to ‘inflexible prerequisites or an exhaustive formula for determining [its] applicability.’ Rather, the doctrine is properly invoked whenever a ‘party is seeking to use the judicial process in an inconsistent way

that courts should not tolerate’ (citations omitted),” Otis v. Arbella Mutual Insurance Company, 443 Mass. 634, 640 (Mass. 2005).

25) “[T]wo fundamental elements are widely recognized as comprising the core of a claim of judicial estoppel. First, the position being asserted in the litigation must be ‘directly inconsistent,’ meaning ‘mutually exclusive’ of the position asserted in a prior proceeding. Second, the party must have succeeded in convincing the court to accept its prior position. Where the court has found in favor of that party's position in the prior proceeding, ‘judicial acceptance of an inconsistent position in a later proceeding would create the perception that either the first or the second court was misled’ (citations omitted). See *East Cambridge Sav. Bank v. Wheeler*, supra at 623 (judicial estoppel not applicable where party did not achieve success in prior proceeding),” Otis v. Arbella Mutual Insurance Company, 443 Mass. 634, 640-41 (Mass. 2005).

26) While “The purpose of the doctrine is to prevent the manipulation of the judicial process by litigants,” Canavan's Case, 432 Mass. 304, 308 (Mass. 2000), and despite the clearly manifested evidence, the Commonwealth Defendants still deceptively claim on 10/30/2024 that “the motion seeks to enjoin governmental action, the judge must find that ‘the requested order promotes the public interest, or, alternatively, that the equitable relief will not adversely affect the public.’”

27) Consequently, Father substantiated and properly concluded in his “Combined Reply To Commonwealth Defendants’ Oppositions To Motions For Injunctive Relief And To Strike”:

“In summary, the just reinforced judicial findings regarding Father’s guilt, ability to pay, and status as ‘not-to-be-discarded’ directly contradict the administrative Deep State’s ongoing & Marxist agenda-driven ‘meager garbage’ projections. Therefore, Father argues that the issue of ‘absolute judicial or prosecutorial immunity’ has been rendered irrelevant until this Court

decides on which side of the government carries priority in these matters, i.e., do the judicial findings of NOT ‘GARBAGE’ come before the administrative ‘GARBAGE’ projections or not? Pursuant to this Court’s judicial estoppel doctrine, both cannot be simultaneously true.”

28) Therefore, should this Court accept the Commonwealth Defendants’ Marxist agenda-based mere projections and deliberate misrepresentations, i.e., the theory summarized effectively as:

“Considering Father’s unlikelihood of success on the merits of his claims and the absence of irreparable harm, an injunction would have an inequitable impact on the Family Court (and AGO). The Family Court (and AGO) have a duty to efficiently adjudicate cases and represent the Commonwealth Defendants in the instant case. Part of that representation includes raising sound legal arguments, such as those that [he] improperly challenges in the instant [motions]. If an injunction disrupts or impairs the defense..., the public will ultimately suffer the consequences. Accordingly, an injunction would have a negative impact on the public, including the individuals who are litigating cases against Father in the Family Court,”

the proven deeply child-predatory activist “feminist” and profiteering “LGBTQ+” discrimination schemes would prevail and replicate through all Massachusetts courts, effectively replacing the current American rule of law with a Stalinist “guilty until proven innocent” guiding principle (with the “proving your innocence” deliberately sabotaged by the administrative Deep State).

No Remedy For Discrimination Is Ever Possible If The Evidence Is Deliberately Discarded

By The Perpetrators Themselves

29) Completely and effectively disregarding the root controversy of the matters, i.e., that “the forcedly indigent Father has demonstrated that he is now openly bullied into discarding or

outright erasing his own meticulously preserved evidence before being allowed to e-file his pleadings and affidavits,” the Commonwealth Defendants also claimed on 10/30/2024 that:

“Additionally, [Father] has not met his burden to establish that imminent irreparable harm will befall him in the absence of an injunction... Rather, a straightforward remedy is available to [Father]: he may simply ‘file [] a motion in the [Family Court] to direct the clerk of that court to take any appropriate steps to prepare the record or correct the docket.’ See Sibinich v. Com., 436 Mass. 1008, 1009 (2002) (citing Temple, 395 Mass. at 133).”

30) However, as already established since 10/14/2024, the Family Court continues to refuse to docket even Father’s e-filed opposition (supported by his affidavit and extensive evidence) to a maliciously biased and hateful anti-immigrant motion and “Feminist Manifesto” by Mother-C.

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Signed under the pains and penalties of perjury.

November 5, 2024,

Respectfully submitted,
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November 10, 2024

President-Elect Donald J. Trump
The White House
1600 Pennsylvania Ave, NW
Washington, DC 20500

Vice President-Elect JD Vance
The White House
1600 Pennsylvania Ave, NW
Washington, DC 20500

Elon Musk
Tesla Headquarters
1 Tesla Road
Austin, TX 78725

Forced Fatherlessness Is The Manifested Objective Behind The Child-Predatory “Feminism” And Profiteering “LGBTQ+” Dual Discrimination Schemes In Today’s Agenda-Driven Massachusetts

Dear President-Elect Donald J. Trump, Vice President-Elect JD Vance, and Elon Musk,

Waking up Wednesday morning to peace and silence on the streets felt unbelievably liberating. Having been raised in a Marxist tyranny, I gained a visceral understanding of how the malicious State routinely fabricates intractable conflict, purposefully and only to justify its unbearable fear-mongering existence.

I am incredibly grateful to you for your focused and persistent efforts to engineer such an overwhelming and disciplined “victory of reason and common sense” for the future of America. And I congratulate you for leading the now clear majority of Americans to strongly reject a soon-to-be former President Biden’s **sneering “garbage”** remark (and [officially devaluing classification](#)) for half of the country’s population.

As a fiercely apolitical immigrant and a loving “simple” father, I have been writing to The White House regarding the [2/16/2023 Executive Order](#). I have been repeatedly claiming that “as the consequences of [President Biden’s] Executive Order (effectively equivalent to mandating ‘Jim Crow’-like segregation of Americans into ‘double protected with equity’ and ‘unprotected with no equity at all’ disjoint camps), the directly implied ‘**American Gulag of leftovers**’ can be categorized only as a hateful [Clintonian-base](#) for ‘forced deprogramming’ of masses of Americans,” similar to the Chinese Xinjiang internment camps.

I justified my claims (that the Presidential Order has a crucial and fundamental **logical fallacy**) in my three docketed *pro se* and indigent SCOTUS petitions by substantiating my repeated layman (but also pressing legal) question: “The ‘Sec. 8. Affirmatively Advancing Civil Rights ... to prevent and address discrimination and advance equity for all’ clause of the 2/16/2023 Presidential Executive Order results in [Russell's Paradox](#), and it must be corrected as a logically unacceptable conclusion to a less deceitful ‘equity for some.’ Is the mandate to selectively ‘advance equity’ (for only some) Constitutional?”

Moreover, in my appellants' brief filed with the U.S. Court Of Appeals For The First Circuit, No. 24-1075, I summarized my arguments on 3/3/2024: "1) The Issue Of 'Equity For All': To resolve the flaw in deductive logic carelessly introduced by [President Biden] **naively enumerating** the purposely non-inclusive 'LGBTQ+' alphabet soup of 'specially protect from others' groups without mentioning the always inherently present 'leftovers,' i.e., Russell's Paradox, the deceitful 'equity for all' promise of the Executive Order must be corrected to a mere 'equity for a chosen some' in contradiction with the U.S. Constitution, 2) The Issue Of Sovereign Immunity: After growing up as a hated minority in a communist tyranny, [this "simple" non-LGBTQ+ father] sympathizes with all minorities. Therefore, the 'LGBTQ+' label used herein refers to [my] already elaborated claim that 'as the consequences of the Executive Order (effectively equivalent to mandating new 'Jim Crow'-like segregation of Americans... [see above]. 3) The Issue Of 'Dogmatic Interplay': In his petition, [this father] substantiated the controversy from the lower courts as a 'dogmatic interplay' to subvert justice based on individual merit and replace it with justice based on [the simplistic], efficient, and convenient but also entirely superficial 'group identity.'"

The root controversy of my lawsuits stems from my "first principles"-based observations, analysis, and meticulous documentation of the forced fatherlessness, i.e., the [extreme parental alienation](#), that my four dear children experienced in the agenda-driven Massachusetts courts since 2011. I referred to the "win-win" divorce strategy by attorney Monroe Inker, a self-described "father of Massachusetts divorce law" from Harvard, as the **Marxist-inspired and deeply child-predatory "feminism" invented by men.**

The ruthless child-predatory strategy is as follows: provoke the distraught father out-of-court by openly torturing his dear children. Predictably, as any human, he will stereotypically respond by "attacking" the mother in court, i.e., openly "victimizing" her directly in front of the judge. Repeat this until he breaks down either by abandoning his children or by being ordered out of the life of his children by the court.

This blatant discrimination scheme based merely on sex was later refined by the first openly lesbian, i.e., the only credible "toxic masculinity combatant," Attorney General and now Governor Maura Healey, to a more precise (thus always "maximized" federal reimbursements producing) gender-based "LGBTQ+" discrimination "tool" in her proverbial "toolbox." The combined deeply child-predatory "feminist" and profiteering "LGBTQ+" dual discrimination schemes provide the ultimate vehicle for Massachusetts to impose the **Stalinist-inspired "predominantly white men are always guilty until proven innocent."**

However, as the American people seemingly took advantage of the liberating "last chance" elections to prevent the Marxist takeover of the country (and the implied deliberate subversion of our Constitution), the frightened citizens of Massachusetts could not follow their "sisters and brothers" in the other states to overwhelmingly reject the to-be-imposed Marxist (and punitive Stalinist) extremes. Still remembering the "forced march" to vote for Ceausescu in Romania, I did not dare to approach a Massachusetts voting booth due to our "one-party dominance" and the extreme "weaponized lawfare" I had been subjected to.

Specifically, as I have been living under an implied house arrest for years now (with literally everything stolen from me), I have no ability anymore to overcome the all too real threat [voiced by Massachusetts](#) just days ago, i.e., "Massachusetts Democratic Gov. Maura Healey... warning that **she will use 'every tool in the toolbox'** to 'protect' residents in the blue state" (see attached). As a legal immigrant, I have tried to use the same "tools in the toolbox" when meticulously collecting and diligently assembling my 5,514-page "SJC Record" the Massachusetts Supreme Judicial Court ordered on purpose. While the state

and federal anti-discrimination statutes equally apply to all, the Massachusetts Attorney General's Office ("AGO") continues to claim that "absolute immunities [for Stalinist 'tools']" exist for them to bully by adopting "guilty until proven innocent" principles and to openly discriminate against "Biden's garbage."

Starting in 2018, I have now sent **174 complaints (and/or desperate messages)** to the AGO regarding the rabid anti-immigrant and anti-"toxic masculinity" discriminations I experienced in Massachusetts:

"Nevertheless, to support an activist and forcefully projected 'feminist' agenda, a notoriously cruel **400 times GAL** Harvard psychologist, a child predator Dr. Robin Deutsch, was brought in to custom fabricate factually false and thoroughly infantile QAnon-style narratives for the [court], specifically: '[child] is afraid the father will 'put suction cups on her feet and take her out the window,' and [child] is afraid the father would 'put him in boiling water' if he went back in the father's care.'"

The "superstar" GAL based her incomplete, faulty, and biased (with my meticulously documented **900+** errors and distortions) investigation on a provocatively administered and defective "psychology test" by a sex-obsessed postdoc with an experience of "probably 10" completed evaluations (without a license).

I diligently reported to Maura Healey, the then Attorney General and proud author of the profiteering "LGBTQ+" discrimination "tool" against the "toxic masculine" fathers of our dear innocent children:

"The GALs went on to lead the American Psychological Association and Pediatric Gender Program at Yale. My forced indignity, caused by systemic discriminations and sustained retaliations by [the AGO], started with my email: Dr. Olezeski, Is your 'Pediatric Gender Program,' in fact, in plain English, **castrating young American boys**? It is well known that the Nazis, as part of the 'emerging eugenics movement,' started with castrating the hated 'inferior' minorities (for clarity, I grew up as a deeply hated minority in a ruthless dictatorship). They moved onto gassing them in masses only after the population and 'scientific community' did not complain nor 'resist' them in any way."

I now have federal proof that the Healey government's combined child-predatory "feminist"/profiteering "LGBTQ+" dual discrimination schemes' manifested objective is to target "ignorant immigrants" to first father children and then "steal" the forever abused and victimized "fatherless children" for "maximized" federal reimbursements. The Healey government is using all the "tricks" (e.g., **mail fraud, obstruction, falsified dockets, etc.**) to cheat and to extort the last penny from a blinded federal government by using immigrants while also barring them access to her "tools in the toolbox," see my endlessly sabotaged *pro se* Title VI/VII of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d/e, *et seq.*) and Civil RICO lawsuits.

Respectfully,
/s/ Imre Kifor¹, Pro Se

Cc: Senator Elizabeth Warren, via Elizabeth_Warren@warren.senate.gov
Katherine B. Dirks, Esq., Deputy Chief, Government Bureau, via katherine.dirks@mass.gov
Judiciary_Whistleblower@mail.house.gov
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¹ Signed under the pains and penalties of perjury as an affidavit (in support of my motion for an injunction against the Commonwealth of Massachusetts submitted to the U.S. Court Of Appeals For The First Circuit, No. 24-1075).

Referenced Links:

1. <https://www.cnn.com/2024/10/30/politics/kamala-harris-joe-biden-garbage-comment/index.html>,
2. <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/02/16/executive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>,
3. <https://www.cnn.com/videos/politics/2023/10/06/hillary-clinton-maga-cult-extremists-donald-trump-house-republicans-amanpour-cnntm-vpx.cnn>,
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5. https://www.ncsc.org/___data/assets/pdf_file/0014/42152/parental_alienation_Lewis.pdf,
6. <https://www.foxnews.com/politics/dem-governor-threatens-use-every-tool-fight-back-against-trump-era-deportations>.

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Superior Court - Middlesex
Docket Number 2481CV00983

COMMONWEALTH OF MASSACHUSETTS

SUPREME JUDICIAL COURT

SUFFOLK, ss

DOCKET No. SJ-2024-M026

IMRE KIFOR,

Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALEY (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 Motion For Leave To File Substantiated
Motion For Relief From Judgments Pursuant To Rule 60
Fraud On The Court**

Date: 10/14/2024

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[REDACTED],
Respondents.

**IMRE KIFOR'S MOTION FOR LEAVE TO FILE SUBSTANTIATED
MOTION FOR RELIEF FROM JUDGMENTS PURSUANT TO RULE 60
FRAUD ON THE COURT**

Pursuant to the SJ-2024-M026 order on 9/26/2024, i.e.,

"The court will grant leave if Kifor demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim," the Petitioner, Imre Kifor ("Father"), certifies that: 1) Father has completed the "record" (to substantiate his claims) that this Court had previously demanded.

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Docket Number 2481CV00983

2) Father has demonstrated that now he is openly bullied into discarding his own meticulously preserved evidence before being allowed to e-file his pleadings.

WHEREFORE, Father respectfully requests that this Court allow docketing of his attached "Motion For Relief From Judgments Pursuant To Rule 60 Fraud On The Court Continuously Committed With The Assistance From The Attorney General's Office" as no remedy for discrimination is ever possible if the evidence is deliberately "discarded" by the perpetrator itself.

Signed under the pains and penalties of perjury.

October 14, 2024,

Respectfully submitted,

/s/ Imre Kifor

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Docket Number 2481CV00983

COMMONWEALTH OF MASSACHUSETTS

SUPREME JUDICIAL COURT

SUFFOLK, ss

DOCKET No. SJ-2024-M026

IMRE KIFOR,

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THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALEY (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 Motion For Relief From Judgments Pursuant To Rule 60 Fraud On The Court Continuously Committed With The Assistance From The Attorney General's Office

Date: 10/14/2024

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COMMONWEALTH OF MASSACHUSETTS

SUPREME JUDICIAL COURT

SUFFOLK, ss

DOCKET No. SJ-2024-M026

IMRE KIFOR,

Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALEY (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 MOTION FOR RELIEF FROM JUDGMENTS PURSUANT TO RULE 60 FRAUD ON THE COURT CONTINUOUSLY COMMITTED WITH THE ASSISTANCE FROM THE ATTORNEY GENERAL'S OFFICE

NOW COMES the Petitioner, Imre Kifor ("Father"), and, pursuant to Mass. R.Civ.P. 60(b)(3 & 6), respectfully requests relief from the attached orders dated 5/31 and 9/26/2024. Therefore, Father respectfully states:
1) In response to the repeated orders by this Court ("SJC"), Father docketed his latest renewed "Petition To Correct And Prevent Ongoing Errors Pursuant To

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Docket Number 2481CV00983

G.L.c. 211, § 3," as SJ-2024-M026 on 8/5/2024. In the docket, Father diligently assembled the meticulously preserved record he was therefore tasked to create.

2) Father's petition concluded that "Consequently, this SJC's observation on 5/31/2024 (that no sign of direct appeal existed in the [Middlesex Probate And Family Court ("Family Court")] dockets) can only be explained by Family Court deliberately: a) discarding the timely notices of appeal, b) concealing that by falsifying the dockets, c) and deceiving about that by committing mail fraud [i.e., by pretending to have allowed Father to file but he then failed to do so]."

3) Father acknowledges that his chain of reasoning had a significant fault: he did not have actual proof of Family Court "carefully stripping the evidence from his mail & silently, without a trace, discarding it."

4) Growing up in a communist tyranny, Father received significant "hands-on" experience with Marxist ideals, i.e., officially stealing from one to satisfy another.

5) Therefore, since Father's first complaint about the systemic discriminations he had experienced in Family Court, he knew that stealing on such a massive scale, i.e., targeting thousands of Massachusetts families

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(and their innocent children) on purpose, amid the literal "most significant distress of their lives," had to involve some quite simple but crucial steps.

6) In his Civil RICO federal class action complaints against the Respondents, Father correctly identified deliberate mail fraud as the "predicate acts" of the RICO racketeering activities. Specifically, a dictated "you must physically mail all your submissions to the Family Court" had a purpose: one could never be sure that one's evidence would ever actually reach a judge.

7) In Father's attached "Updated Affidavit Of Facts In Support Of His Motions For Relief And Judgment On Claims Of Agenda-Driven 'LGBTQ+' Discriminations And Continued Concealing Civil Rights Violations," already submitted to the Family Court on 10/13/2024, Father substantiates that the last three Family Court judges effectively confirmed "never seeing" Father's factual evidence (that he had physically mailed to the Court).

8) As Father knows that a) he diligently mailed his explicitly allowed evidence, b) Family Court received it, and c) his attached evidence then "disappeared" with no trace before the judges reviewed his filings, Father concludes that the Family Court has a "split-

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personality": the visibly benevolent but also ignored "DEI facade" and a hidden, silencing, defrauding and unlawfully discriminating administrative "Deep State."

9) Having to continue to physically mail his filings to the Family Court would have never allowed Father to substantiate his pleadings for relief. Apparently, the SJC also concluded the same, as between the 5/31/2024 order and the SJC's later 9/26/2024 order, Father was suddenly allowed to e-file his Family Court pleadings.

10) Just as with computer networks, where reliable and trusted communication is a necessity, an e-file system properly implements the needed "handshake" protocol to confirm all the steps of a court's submission process.

11) Therefore, the Family Court could not continue to rely on the past "mailed-in" shenanigans, and the SJC's 9/26/2024 order was correct for denying the filing of an outdated petition, i.e., "The court will grant leave if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim. He has not met the requirement set forth in our prior decision that would entitle him to leave to file the current papers."

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Docket Number 2481CV00983

12) Recognizing that the finally allowed e-filing gave Father a possibility of an "adequate remedy," i.e., to request relief directly from Family Court, he promptly e-filed his already explicitly "allowed to be e-filed (including all the extensive substantiating evidence)" submissions. However, on the same day, Family Court rejected all of his e-submissions. Specifically, as Family Court could no longer silently discard Father's evidence from his mailed-in envelopes, it bullied him to discard his "attachments" himself, lest the Family Court would pretend that the e-filing never happened.

13) While Father immediately submitted complaints to MCAD and the AGO's Civil Rights Division, it is clear that the Family Court has no intentions of allowing Father to file his preserved evidence, especially now that a *pro se* Mother (**with strong anti-immigrant bias**) finally, after 6 years of her total inaction, reminded the Family Court on how to proceed, "The Law (Mass General Law Section 1) states that [Father's] actions are a felony and as such the Court shall not enter any order which would result in a decrease in the amount paid for current support pursuant to an order or judgment on behalf of the child who support is owed."

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14) Elaborating on the above "schism" in Family Court, i.e., that the last three judges, the benevolent "DEI layer," have specifically allowed Father to file his evidence, and that the hidden, silencing, defrauding and unlawfully discriminating administrative "Deep State" effectively discarded Father's evidence before it could be seen by the judges, Father continues to argue that the Commonwealth Respondents' now recorded attempt to deceive in the Middlesex Superior Court, by deliberately misrepresenting that the mere "record-keeping" operations in the Family Court are somehow genuine "judicial" acts (**while directly contradicting the thus explicitly judicial decisions**) amounts to silently defrauding even the SJC, as no remedy against discrimination is ever possible when the "untouchable" administrative "Deep State" breaks the law on purpose.

WHEREFORE, Father respectfully requests that this Court declare that Father's submitted "record" (to substantiate his claims) is now complete and that this Court's conditions are finally satisfied, as no remedy for discrimination is ever possible if the evidence is deliberately discarded by the perpetrators themselves.

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10/13/2024 Imre Kifor's Updated Affidavit Of Facts In
Support Of His Motions For Relief And Judgment On
Claims Of Agenda-Driven "LGBTQ+" Discriminations
And Continued Concealing Civil Rights Violations
(509 pages)

Signed under the pains and penalties of perjury.

October 14, 2024,

Respectfully submitted,

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47.1

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11/5/24

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT

MIDDLESEX, ss.

SUPERIOR COURT

IMRE KIFOR, Plaintiff, v. THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALEY (official capacity), ATTORNEY GENERAL ANDREA CAMPBELL (official capacity), COMMISSIONER GEOFFREY SNYDER (official capacity, MA DOR CSE), MIDDLESEX PROBATE AND FAMILY COURT, ██████████ ██████████ Defendants.

Case No: 2481CV00983

**PLAINTIFF’S COMBINED REPLY TO COMMONWEALTH DEFENDANTS’
OPPOSITIONS TO MOTIONS FOR INJUNCTIVE RELIEF AND TO STRIKE**

NOW COMES the Plaintiff, Imre Kifor (“Father”), and, in this reply to the Commonwealth Defendants’ (“CWD”) oppositions to his motions for relief and to strike, respectfully states:

- 1) Substantiated by Father’s attached “Plaintiff’s Memorandum Of Law, Facts, And Precise Timeline In Support Of Combined Reply To Defendants’ Oppositions To Relief” and his three-volume “Plaintiff’s Record Appendix To Substantiate Claims Of Systemic ‘Rule 60 Fraud On The Court Continuously Committed With The Assistance From The Attorney General’s Office,’” Father asserts that the recent decisions (since 10/17/2024) by the CWD have rendered the CWD’s “barred by absolute judicial or prosecutorial immunity” boilerplate legal theory and text, routinely applied by the Attorney General’s Office (“AGO”), irrelevant.

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- 2) Specifically, on 10/18/2024, the Middlesex Probate And Family Court (“Family Court”) reiterated once again that Father was (forcedly) indigent and allowed his requests for the Commonwealth to “substitute or pay” the “normal fees and costs” to initiate his litigations.
- 3) This Superior Court and the Massachusetts Supreme Judicial Court (“SJC”) had made the same (forced) indigency decisions on 4/18 and 8/5/2024 (see SJ-2024-M026), respectively.
- 4) Moreover, Father’s **forced indigency** decisions (as he is a trained, skilled, and accomplished software engineer and past successful entrepreneur) by all of the Massachusetts courts now (see the 40+ Massachusetts Appellate Court dockets) therefore directly reinforce the Family Court’s recent 2/26/2024 judgment, i.e., “The [Family] Court finds [Father] does not have a present ability to pay [his thus endlessly accumulated **\$415,000+** of court-ordered in-arrears obligations for his four children], and therefore finds [Father] NOT GUILTY of contempt.”
- 5) Consequently, since Father filed his “Notice Of Motions For Temporary Injunctive Relief And To Strike The Commonwealth Defendants’ Motion To Dismiss” and properly served his accompanying motions for temporary injunctive relief and to strike on 10/17/2024, all the prior judicial findings supporting his claims of disparate treatment have been renewed, i.e.,
 - a) Father is NOT GUILTY (of non-payment of now manifestly usurious “child supports”),
 - b) Father is still NOT ABLE (to pay for “normal fees and costs” required by courts), and
 - c) therefore, Father is NOT “GARBAGE” (i.e., his evidence should not be discarded and, in fact, the Commonwealth should pay for his opportunity to present his evidence in court).
- 6) In his “Updated Affidavit Of Facts In Support Of Motions For Relief And Judgment On Claims Of Agenda-Driven ‘LGBTQ+’ Discriminations And Continued Concealing Civil Rights Violations,” Father substantiated on 10/13/2024 (with 485 pages of evidence) that:

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- “As Father knows that a) he diligently mailed his explicitly allowed evidence, b) the Family Court received it, and c) Father’s attached evidence then ‘disappeared’ with no trace before the judges reviewed his filings, Father concludes that the Family Court has a ‘split personality’: the visibly benevolent but also ignored ‘DEI facade’ and a hidden, silencing, defrauding and unlawfully discriminating administrative ‘Deep State.’”
- 7) Father also reported to the SJC in his “Motion For Relief From Judgments Pursuant To Rule 60 Fraud On The Court Continuously Committed With The Assistance From The [AGO]”:
- “Elaborating on the above ‘schism’ in the Family Court, i.e., that the last three judges, the benevolent ‘DEI layer,’ have specifically allowed Father to file his evidence, and that the hidden, silencing, defrauding and unlawfully discriminating administrative ‘Deep State’ effectively discarded Father’s evidence before it could be seen by the judges, Father continues to argue that the [CWD’s] now recorded attempt to deceive in [this Superior Court], by deliberately misrepresenting that the mere ‘record-keeping’ operations in Family Court are somehow genuine ‘judicial’ acts (**while directly contradicting the thus explicitly judicial decisions**) amounts to silently defrauding even the SJC, as no remedy against discrimination is ever possible when the ‘untouchable’ [i.e., blindly protected by absolute/sovereign immunity] administrative ‘Deep State’ breaks the law on purpose.”
- 8) Confirming the even wider schism between all the affected courts (i.e., the manifestly signed and mailed orders by named officers of the courts) and a merely administrative Deep State, Father’s attempts to e-file his relevant evidence were rejected once again on 10/22 & 23/2024 by the nameless yet agenda-driven “record-keeping” administration noting, “It looks like the Judge allowed you to file the motion and affidavits, not all these attachments. Mail in or drop

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- off,” “[W]e cannot accept exhibits on e-file, you either have to bring them in or mail them,” and “Pleadings too large for processing. Please file hard copies with the Clerk's Office.”
- 9) The immediate, deliberate obstructions by the Deep State of Father’s meticulously collected and diligently assembled evidence (for sustained and systemic disparate treatment against a legal immigrant, i.e., a member of a “protected class” but still NOT the desired “feminist”/ “LGBTQ+” victim), were seemingly meant to further bolster the AGO’s just reiterated 10/21/2024 concealment, i.e., “Please be advised that after reviewing your complaint, the Civil Rights Division has decided not to further investigate or intervene in this matter at this time.”
- 10) Father's extensively substantiated 2-volume “Status Affidavit On SJC Supporting Affidavit And Created Record To Substantiate Claims Of Systemic ‘Rule 60 Fraud On The Court Continuously Committed With The Assistance From The [AGO]’” (that this Court rejected on 10/23/2024 from e-filing) duly documented **“a Marxist agenda-driven AGO discarding Father’s 174 complaints (and/or desperate messages) on purpose as mere ‘garbage.’”**
- 11) Therefore, on 10/21/2024, the AGO continued to collude with (and openly obstruct, despite Father’s thus explicitly and diligently assembled SJC Record) the administrative Deep State’s blatantly anti-immigrant “discrimination in a public place” when declining Father’s desperate requests to the AGO, e.g., “I need the AGO’s help in mediating or resolving my complaint.”
- 12) Father asserts and reiterates that his now 174 complaints (and/or desperate messages) to the AGO were due to the manifestly false, biased, & outright hateful anti-immigrant projections maliciously metastasized to all of his Family Court dockets back in early 2018, i.e., “It is believed that [Father] has hidden assets with his parents, who have returned to Romania.”

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- 13) Consequently, all the prior deeply child-predatory “feminist” and profiteering “LGBTQ+” agenda-driven projections by the administrative Deep State have resurfaced with the AGO’s collusion on 10/21/2024, therefore directly & forcefully re-inducing the disparate treatments:
- a) Father is still GUILTY (of non-payment of now manifestly usurious “child supports”),
 - b) Father must be ABLE (to pay for “normal fees and costs” of all his court filings), and
 - c) Father is mere “GARBAGE” (i.e., his meager “immigrant evidence” must be discarded).
- 14) In summary, the just reinforced judicial findings regarding Father’s guilt, ability to pay, and status as “not-to-be-discarded” directly contradict the administrative Deep State’s ongoing & Marxist agenda-driven “meager garbage” projections. Therefore, Father argues that the issue of “absolute judicial or prosecutorial immunity” has been rendered irrelevant until this Court decides on which side of the government carries priority in these matters, i.e., do the judicial findings of NOT “GARBAGE” come before the administrative “GARBAGE” projections or not? Pursuant to this Court’s judicial estoppel doctrine, both cannot be simultaneously true.
- 15) Arguing that “the forcedly indigent Father has demonstrated that he is now openly bullied into discarding or **outright erasing** his own meticulously preserved evidence before being allowed to e-file his pleadings and affidavits,” Father filed his attached “Emergency Motion For A Temporary Injunction Against The Commonwealth Respondents Pursuant To Anti-Discrimination Statutes” with the SJC on 10/24/2024. In the motion, “Father reiterates that the now 6+ years-long open conspiracy by the [CWD] (to silence and enslave Father) has resulted in Father’s fully intractable forced indigency and absolute unemployability (see his attached “Job applications for [11/6/2024 (2,280+) submitted job applications since 2019)”

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email proof) and he has no means to physically transport himself to the courts nor funds to keep re-mailing his evidence, only to be immediately discarded time and time again.”

- 16) CWD also claims in the oppositions on 10/30/2024 that “[Father’s] Motion [to strike] should be denied because it is procedurally improper, untimely, and lacking in merit... [and] because [Father] had the opportunity to - and did - prepare a response in opposition to the [CWD’s] motion to dismiss.” While Father desperately attempted to update this Court by submitting his first amended complaint on 7/8/2024, Father’s proper motion to amend is still pending.
- 17) Even CWD noted this relevant detail on 10/30/2024, i.e., “Although there are filings related to the Amended Complaint on the Court’s docket, the [CWD] note that the Amended Complaint does not appear on the docket.” Consequently, Father concludes that this Court dismissing a so far “rejected from even filing” (and therefore effectively non-existent) first amended complaint would defy all reasonable logic and would violate the rules of the Court.
- 18) Moreover, CWD argues in their oppositions on 10/30/2024 that “Even if the Court were to consider the merits of the [motions, they] should still be denied as baseless... [Father] appears to argue that the [CWD] motion to dismiss should be stricken because acts by Family Court administrative staff are outside the scope of the judicial immunity doctrine... [He] argues that court personnel who are responsible for entering documents onto the court’s docket are part of a ‘hidden, silencing, defrauding & unlawfully discriminating administrative Deep State.’”
- 19) Specifically, CWD deceives, obstructs, and deliberately misrepresents in this Court with the following: “However, there is no evidence to support that claim beyond [his] own subjective, and highly implausible, beliefs. Because [Father’s] assertions of wrongdoing relate to court administrative personnel who were acting in their capacity as such, the doctrine of judicial

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immunity applies.” Evidence for Father’s assertion that “no remedy for discrimination is ever possible if the evidence is deliberately discarded by the perpetrators themselves,” i.e., that his mailed-in evidence had been silently discarded as mere “garbage,” comes from the “All other requested relief fails to be supported by facts that are not merely speculative and conclusory” judgment by Family Court on 2/26/2024 and later corroborated by the direct confirmation:

“However, on 10/15/2024, during the hearing in Family Court, Hon. Judge Manisha H. Bhatt directly confirmed that [Father’s] specifically ‘allowed to be filed’ affidavits containing the explicitly requested number (by the Judge) of [Father’s] physically mailed 2,318+ (21 text) pages, and [Father’s] later e-filed 388 (7 text) pages, of evidence, have been discarded with no trace. Judge Bhatt effectively said during the hearing, ‘I certainly have no 2,318 pages nor 388 pages of evidence in front of me on the dockets.’”

CONCLUSION

20) The reinforced judicial findings directly contradict the sustained and systemic agenda-driven mere projections by the CWD and render CWD’s arguments irrelevant, as judicial estoppel must apply. Therefore, Father has satisfied the requirements for a preliminary injunction and reiterates his respectful request that this Court issue the injunction against the Defendants.

Signed under the pains and penalties of perjury.

November 5, 2024,

Respectfully submitted,
/s/ Imre Kifor
Imre Kifor, Pro Se
32 Hickory Cliff Rd.
Newton, MA 02464
ikifor@gmail.com
I have no phone

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I have no valid driver's license
I have to move to a homeless shelter
<https://femfas.net>

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COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT

MIDDLESEX, ss.

PROBATE AND FAMILY COURT

**IMRE KIFOR'S UPDATED AFFIDAVIT OF FACTS IN SUPPORT OF HIS MOTIONS
FOR RELIEF AND JUDGMENT ON CLAIMS OF AGENDA-DRIVEN "LGBTQ+"
DISCRIMINATIONS AND CONTINUED CONCEALING CIVIL RIGHTS VIOLATIONS**

NOW COMES the Plaintiff, Imre Kifor ("Father"), and, pursuant to Mass. R. Civ. P. Rule 12 (c),
"Motion for judgment on pleadings," and Rule 56, "Summary judgment," respectfully states:

SJC Record Assembled As Direct Opposition To Relentless Discriminations

- 1) The Massachusetts Supreme Judicial Court ("SJC") ordered Father to "create a record" to substantiate claims of disparate treatment, fraud on the court, institutionalized child abuse, etc.
- 2) Father furnished the properly served, never contested, and timely record as SJ-2024-M026.
- 3) Father substantiated his SJC record with his meticulously preserved and redundantly verifiable evidence already repeatedly submitted to his now 41 Massachusetts Appellate Courts dockets.
- 4) Father's voluntary evidence specifically included his complete & exhaustive financial history.
- 5) Following the Massachusetts Commission Against Discrimination's ("MCAD") decision to dismiss his prior complaint due to "Duplicate filings with SJC," Father's SJC record included the identified 96 "Concise Factual Claims" of disparate treatment in an explicit opposition to them.
- 6) Father also encapsulated his entire SJC record into a 12-volume "affidavit on the record" for his Middlesex Probate & Family Court ("Family Court") dockets, see "Consolidated Affidavits."

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7) Immediately after the rejection by Family Court of Father's allowed attempt to e-file parts of his SJC record on 9/26/2024, he resubmitted his now crystalized 96 "Concise Factual Claims" to both MCAD and the Massachusetts Attorney General's Office ("AGO") as renewed complaints.

Sustained Anti-Immigrant And Systemic "LGBTQ+" Agenda-Driven Discriminations

8) The SJC record identifies 2 types of disparate treatments that the Respondents used on Father.

9) As an immigrant, Father was targeted in Family Court with a "he has a passport" to wrestle his children's physical custody away from him (as a last resort after the police refused to arrest him and DCF screened out the falsely claimed child abuse at the end of a maliciously staged "coup").

10) As a recipient of U.S. political asylum (due to having been a "hated" Hungarian minority), Father was also targeted in Family Court with a still ongoing "he has hidden Romanian assets."

11) Defendants [REDACTED] ("Mother-B") and [REDACTED] ("Mother-C") knew from day one that Father and family had left nothing behind when emigrating from Romania in 1986.

12) Through his consistently filed affidavits of indigency, Father diligently attested in all courts since 2019 that he has no assets, money, property, etc., left anywhere inside (or outside) the U.S.

13) Other than immigrants, no other U.S. citizen can be credibly targeted in court with either "he has a passport" or "he has hidden Romanian assets" without immediately furnishing some proof.

14) Consequently, Father is a genuine member of the "discriminated against based on national origin" group, i.e., the explicitly protected class in all state & federal anti-discrimination statutes.

15) As a white, forcedly non-custodial, and "simple" father (i.e., strictly non-"LGBTQ+"), Father also categorically falls into the "leftover" (or the "never protected") complementary "class" after considering all present & future protected classes in all (even merely conceivable) legal statutes.

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- 16) As a genuine “leftover,” Father can never protect himself from the discriminatory acts of a legal entity with sovereign immunity. Moreover, any entity with sovereign immunity can freely violate Father’s constitutional due processes and equal protection rights without consequences.
- 17) Specifically, Father complained to the AGO already on 3/13/2024, i.e., “As of 2/26/2024, a brand new G.L.c. 272, § 98, discrimination based on sex and gender occurred in Family Court violating my civil rights” and “I need the AGO's help in mediating or resolving my complaint.”
- 18) While sovereign immunity limitations do not bind the AGO, the Commonwealth Defendants (“State”), including the AGO itself, effectively forced the *pro se* Father on 7/23/2024 to dismiss altogether his claims of “deliberate discriminations in a public place” against the Family Court.
- 19) Consequently, an activist “feminist” and an “LGBTQ+” agenda-driven State can deliberately retaliate against Father by stereotypically punishing him for all the projected harm, injury, abuse, etc., committed by the thus “never protected” class against the (now vigilantly) protected classes.
- 20) Such merely projection-based stereotypical retaliations are also motivated by substantiated profiteering in the millions. Due to the Family Court’s discriminatory and child-predatory acts, the State continues to receive the mandated “maximized” (via deliberate fraud and “LGBTQ+” agenda-driven disparate treatments) Child Support Enforcement (CSE) federal reimbursements.
- 21) Father has meticulously documented these stereotypical retaliations in his SJC record. As targeted retaliations are discriminations, Father is also a genuine member of the never-protected (but still systemically “discriminated against based on sex and gender”) complementary “class.”
- 22) Father continues to reiterate in his records that the “LGBTQ+” label usage has nothing to do with the actual minorities, as it exclusively refers to the discrimination and profiteering scheme by the activist State against the never-protected (but always implicitly present) mere “leftovers.”

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23) The sustained activist “feminist” and systemic “LGBTQ+” discriminations against the thus insinuated “toxic masculine” Father are substantiated by his children’s complaints of “feelings of fatherlessness,” i.e., the officially induced extreme parental alienation, reaffirmed on 1/10/2024.

24) Consequently, the State’s profiteering agenda for creating forced “fatherlessness” in children is further substantiated by Father never having any contact with his younger children outside of the activist “feminist” and “LGBTQ+” agenda-driven interfering and retaliating “supervision.”

25) Specifically, Father had 500+ supervised visits with his children with no complaints at all.

Predatory Agenda-Driven Continued Due Process And Equal Protection Violations

26) Father identified and consistently claimed in his SJC record that the agenda-driven State’s continued unlawful disparate treatment against him based on sex, gender, and national origin was committed through the sustained & systemic denying of due process and equal protection rights.

27) Father has personally experienced that Marxist tyrannies solve the “problem of dissent” by splitting the state into a virtuously protective facade, e.g., the communist public “show trials,” and the secretive and viciously punishing “deep state,” e.g., the KGB, Stasi, Securitate, etc.

28) As predatory agenda-driven stereotypical projections only work if no exceptions are found, any dissent must be silenced. Family Court has consistently “silenced and enslaved” Father only to keep the court dockets free of his “dissenting” evidence for the sustained discriminatory acts.

29) In “**Affidavit On Sustained Institutionalized Child Abuse (Forced Parental Alienation),**” Father reiterated on 11/29/2023 that “the meticulously documented systemic child abuse and agenda-driven parental alienation were effectively concealed when Family Court ignored [his] submitted filings on 2/3/2014 while stripping him of his protecting legal custody of children... this occurred just after the first 12/5/2013 ‘gatekeeper orders’ were issued by Family Court.”

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30) Father also asserted on 11/29/2023, “Pursuant to [Civil RICO], Father was first injured by the first predicate act on 12/5/2013 when Family Court omitted mailing the above unappealable denial. Father learned about it only after 6/30/2014. Therefore, a simultaneous appeal of the parallel and colluding cases became predictably impossible (as the other judgment was dated 2/13/2014),” “Father’s cause of action was completed only on 8/9/2021 when he learned from the AGO that the 12/5/2013 secret denial was recorded in the Family Court docket entries 6+ months after it could have been appealed, rendering the omitted mailings deliberate obstruction and fraud,” and “Father’s now 5+ years-long diligent stream of timely and properly filed motions for relief (due to the fully substantiated Rule 60 Fraud On The Court) have consistently referred to the Family Court’s actions (both leading up to the above-listed first Civil RICO predicate act and beyond), including the 12/5/2013 purely ‘feminist equity’-based but discriminatory denial.”

31) In his “**Affidavit On Systemic Discrimination Based On Race, Sex, National Origin, And Age,**” Father recalled on 11/29/2023 that “On 4/21/2022, Father filed his ‘Memorandum Of Law In Support Of Motion To Certify Three Legal Questions’ with the SJC.... In it, [he] consistently substantiated, with a meticulously compiled record, that: ‘Father was never notified of the Family Court’s ‘secret’ [12/5/2013] denials of his attempts to substantiate his claims of therefore allowed systemic child-predatory fraud, defamation, and sustained [statutory] discriminations.’”

32) Moreover, Father diligently restated on 11/29/2023 his already substantiated facts, “the 12/5/2013 secret denial, with all subsequent unappealable decisions explicitly building upon it, demonstrates a materialized intent to defraud our entire ‘rule of law’ system, including our federal law. To avoid appellate reviews, Family Court has resorted to Civil RICO predicate act violations when sabotaging and retaliating against Father’s defensive steps of avoiding the now

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genuinely usurious debt from endlessly accumulating. Even the U.S. District Court asserted: ‘Put more simply, Kifor maintains that the Family Court, on multiple crucial occasions, deliberately failed to notify Kifor of its rulings, which resulted in Kifor not being able to appeal the same.’”

33) As Father’s affidavit filed on 11/29/2023 directly incorporated his also *pro se* full text of his federal **“Affidavit On Petition For Writ Of Certiorari Submitted To The U.S. Supreme Court,”** Father restated that “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). Moreover, it also unambiguously means that, while having a duty and legal obligation to disclose the 12/5/2013 denial, Family Court deliberately omitted ever mailing it, as per the statutory definition of 18 U.S.C. §1341 mail fraud: ‘There are two elements in mail fraud: (1) having devised or intending to devise a scheme to defraud (or to perform specified fraudulent acts), and (2) use of the mail for the purpose of executing, or attempting to execute, the scheme (or specified fraudulent acts),’ Schmuck v. United States, 489 U.S. 705, 721 n. 10 (1989).”

34) Father then concluded in his affidavit, “Since 12/26/2022, when the motions were first filed in Family Court, Father has been repeatedly claiming and meticulously substantiating to all courts that: ‘[Family] Court’s activist and deliberately child-predatory suppressing of evidence routine first manifested itself on 12/5/2013 as substantiated by a) [the Family] Court’s falsified official docket entries served on Father by the AGO’s office on 8/9/2021, and b) Father’s 545 pages long submissions documenting the circumstances of the prior actions to SJC-13263 on 4/

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21/2022.’ Moreover, Father’s repeated petitions to the SJC (a total of seven with five appeals to the full court) specifically referenced his filed (and substantiated with 299 pages of evidence) federal Civil RICO complaint and proper appeal. These ‘create a record’ to prove that the existentially threatened Father’s proper complaints of fraud, defamation, and discrimination had been silenced in Family Court (i.e., Father’s constitutional rights for free speech, due process, and equal protection had been deliberately violated during hearings and trials),” on 11/29/2023.

35) In “**Affidavit On Deliberately Induced Existential Employment, Health, And Housing Crisis,**” Father also noted on 11/29/2023, “Most importantly, just as baselessly floated by SJC-13427 on 8/8/2023, ‘To the extent Kifor 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,’ any premature appeal referencing this [Family] Court’s ‘secret’ 12/5/2013 denial would have resulted at most in a Mass. R. Civ. P. 60 (b) (1) ‘mistake, inadvertence, surprise, or excusable neglect’ finding. Father has been consistently alleging deliberately (i.e., purposely, knowingly, recklessly, and negligently) committed Rule 60 Fraud On The Court, or the explicit alternative, i.e., ‘Mass. R. Civ. P. 60 (b) (6),’ in the above SJC-13427. Through the now 80+ hearings, [Family] Court never once alluded to making any mistakes, inadvertences, or ‘excusable neglect’ in any decision, despite the parallel matters having ‘metastasized’ all over the Lowell District Court, the Middlesex Superior Court (2 cases), the Appeals and Supreme Courts (34 dockets), U.S. District Court (5 cases), U.S. Court of Appeals, First Circuit (2 dockets), and also the U.S. Supreme Court. Therefore, Father asserts that the 12/5/2013 secret denial, with all the subsequent decisions explicitly building upon it, demonstrates an intent to defraud the entire ‘rule of law’ system. The motive & means for the acts (and conspiracy to conceal by silencing &

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enslaving) are substantiated in [his] attached '*Class Action Complaint For Relief And Damages for Violations of Title VI/VII of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d/e, et seq.), Age Discrimination in Employment Act of 1967 (29 U.S.C. § 621, et seq.), Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-6107), deprivation of civil rights (42 U.S.C. §§ 1981, 1983, and 1985), and systemic/sustained Civil RICO (18 U.S.C. § 1962) prohibited activities*' and [supported by his] '*Affidavit On Deliberately Induced Existential Employment, Health, And Housing Crisis.*'"

36) In his "**Affidavit On Continued Conspiracy To Obstruct And Commit Federal Mail And Wire Fraud,**" Father also documented on 11/29/2023, "Father has had severely restricted access to his dockets in the Family Court... Without notice, Family Court opened public access to the dockets on (or before) 11/14/2023. Instead of the five pages of summaries on 10/3/2023, the same docket suddenly contained 20 pages of usable details on 11/14/2023. Father downloaded the docket entries for his dockets immediately. He also emailed the 47 pages of new data to the parties. Had Family Court provided access to the docket entries before, the *pro se* Father would have been able to promptly confirm that his proper and timely filings with the Family Court were indeed received and docketed as intended. Without this elementary (yet crucial) transparency, Father was forced to keep filing his existential pleadings redundantly, i.e., 'just to be sure.' To emphasize the gravity of the matters, his in-arrears obligations have reached \$355,000+. Father based his petition to the U.S. Supreme Court on a substantiated Rule 60 Fraud On The Court that occurred in Family Court on 12/5/2013. Father claimed that the appealed 8/8/2023 decision by the SJC was attempting to merely continue to obstruct the systemic fraud that has subsequently metastasized through the various courts. Consequently, Father now has 40+ dockets in the affected state courts. As all courts, other than Family Court, have a transparent system, Father

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had no problems with his proceedings. The state receives federal child support enforcement reimbursements based on the Family Court's actions. These have to be maximized by law. As no other state court has that strict constraint, Father concludes that the 'secrecy' of the Family Court dockets was driven by it. Father keeps a meticulous database of all his court proceedings. As all his verifiable steps are well preserved, Father can readily reconcile all his records with the new data provided by Family Court. The results of Father's analysis of the just-released docket entries are attached. The scope of the herein report is limited roughly to the period since Father first filed his Civil RICO claims on 7/13/2022. During this year and a half, Family Court has ignored Father's filings 41 times. Using the baseless and unappealable 'gatekeeper orders,' Family Court barred Father's filings 16 times. Family Court also kept crucial decisions secret seven times.”

37) In his filed and diligently substantiated “**Status Affidavit And Memorandum Of Law On Continued Systemic Discriminations And Retaliations,**” Father reiterated on 1/14/2024 that “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.’ To conceal the committed original discriminations (based on national origin and sex) and the sustained targeted retaliations against the complaining Father,

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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. Family Court also committed mail and 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. In his docketed Civil RICO Class Action Complaint, Father asserted that the 12/5/2013 denial [had] 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 [to] 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.’ 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, [459 Mass. 697, 707 n.24 (Mass. 2011)].”

38) Identifying the key elements in his “Emergency Petition To Correct And Prevent Ongoing Errors Pursuant To G.L. c. 211, § 3” (SJ-2023-M014), Father requested the SJC on 12/17/2023 to “Declare that deliberately omitting to communicate a court’s decisions with the parties interferes

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with the regular execution of the laws and order the Family Court to mail the 12/5/2013, 2/12/2018, and 3/23/2023 rulings of the 07D3172DV1 and the secret 'gatekeeper' orders of the 11W0787WD/11W1147WD dockets to Father to enable his intended appeals to be properly initiated.”

39) While the SJC denied his motion for leave to file his petition on 2/29/2024, Father continued to inform the SJC with his **“Status Affidavit On Sadistic ‘LGBTQ+’ Agenda-Driven Family Court Deliberately Victimized Confused Mothers While Forcefully ‘Reprogramming’ Children”** on 5/19/2024 (see SJ-2024-M008/010), “Father knew that he had been discriminated against by Family Court as early as 2011 and attempted to address the incidents immediately. Predictably, Father could not overcome the unleashed retaliations, interferences, and aiding and abetting. Diligently observing the Family Court’s actions, Father was able to infer later that the pivotal decision had been the never-communicated 12/5/2013 ‘gatekeeper’ order denying his evidence. Father categorized the mail fraud as an also G.L.c. 151B interference after receiving the Family Court’s 2/22 and 26/2024 decisions. This led to the sudden: ‘On 4/20/2024, Father was [allowed] to download the 12/5/2013 order from the online dockets,’” and “In his ‘Affidavit On First Justice Cafazzo’s Deliberate And Unlawful Conspiracy To Violate Title VI/VII Rights And Commit Civil RICO Prohibited Activities’ submitted to Family Court on 5/5/2024, Father duly observed that ‘the secret (for 10+ years) 12/5/2013 order immediately confirmed [Father’s] timely opposition’ and that ‘the following clear abuses of judicial discretions directly [underlie] the 6/30/2014 judgment as Family Court forcefully overruled: 1) even the GAL’s admission of errors, 2) the therapists’ joint conclusion that Father presented no danger to his children, 3) the attorneys’ documented collusion to defraud the court itself, 4) the easily verifiable record of Father’s and his family’s political asylum in 1986, and 5) that the three Harvard Medical School

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medical doctor/professor therapists professionally wanted nothing to do with Family Court's child-predatory profiteering.' The significance of the 12/5/2013 'gatekeeper' order, especially its secrecy, is that it kept the committed statutory discriminations based on sex and national origin concealed and effectively protected from any appellate reviews. Moreover, it also allowed Family Court to sanitize the dockets, as none of Father's 'merely speculative' filings were to be docketed. Such deliberately falsified dockets are the unequivocal 'evidence of fraud [including fraud of the court], mail fraud, discrimination or any other basis under Rule 60(b)' contradicting the Family Court's 2/22/2024 thus deceptive findings issued only to obstruct justice on purpose." 40) Carrying over his substantiated affidavits to his consolidated SJC record, to SJ-2024-M026, Father reiterated on 5/19/2024 that "Atty. Otis continued to deceive and lie knowingly in Family Court on 2/6/2018: 'It is likely that [Father] has hidden his assets and money and perhaps with his parents who, upon information and belief, have returned to Romania where they previously enjoyed an upper-class lifestyle and continue to own property.' Atty. Otis had known that Father's submission on 1/31/2014 was obstructed by Family Court per the secret 12/5/2013 'gatekeeper' order. On 1/31/2014, the whistleblower Father submitted his proper complaint to Family Court: 'Most importantly, Dr. Deutsch knowingly withheld significant facts about Father's traumatic special prior relationship with [Mother-B's] attorney, Gail Otis. Atty. Otis, through her long-term relationship with both [Mother-B] and Father, along with her extended and intimate knowledge of the couple's past, was in the position to **personally prompt and allow her client to flatly lie under oath during her trial testimony and hide over 4 million dollars of net worth.** The attorney thus created extreme legal duress in her client, allowing her to then churn the lawsuits... to her advantage while exposing children to unprecedented suffering as per

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[her] well-publicized never settle Inker(/Otis)-strategy.’ On 7/17/2017, Father summarized the ‘win-win’ legal strategy (through victimizing mothers) as ‘The predatory strategy is as follows: provoke the father out-of-court by torturing his children, and he will stereotypically respond by attacking the mother in-court, i.e., openly victimizing her in front of the judge. Repeat this until the father breaks down either by abandoning his children or by being ordered out of the life of his children by the court. Strategies have weak points. This high-stakes legal gaming targeting children is limited only by how far the mother is willing to go in punishing her children. And by how much the attorneys are able to professionally stomach. In the case of ruthless, psychopath lawyers, this shortcoming [is] mitigated by them by first incriminating the emotional mother.’”

AGO Claims “Absolute Judicial Immunity” Deceptions To Conceal Civil Rights Violations

41) Father stated in affidavits on 5/19/2024, “Conclusive evidence that the predatory ‘LGBTQ+’ scheme is driven solely by the allowed purpose-fabricated ‘high-conflicts’ came with the 2/26/2024 [Family Court] ruling that Father’s ‘all other requested relief fails to be supported by facts that are not merely speculative and conclusory.’ The release on 4/20/2024 of the previously secret 12/5/2013 ‘gatekeeper’ order confirmed directly that Father’s filings and oppositions were received by Family Court but were never recorded in the docket. A specific case in point is Father’s never-recorded 1/31/2014 whistleblower ‘complaint’ about Mother-B being blatantly suborned by Atty. Otis to lie about millions of dollars of her net worth during trial. Therefore, with the falsified dockets containing no opposition or uncomfortable refutals of the corrupt ‘professionals’ whatsoever, everything a ‘simple father’ could say would be forever destined to be ‘merely speculative and conclusory.’ If a simple father’s filed fact-based *pro se* oppositions

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and easily verifiable evidence against all deliberate attorney-assisted fabrications are kept out of court dockets on purpose, the dockets can be effectively sanitized against all later reviews.”

42) Moreover, on 5/19/2024, Father also concluded, “On 3/25 and 27/2024, the Appeals Court (Nos. 24-J-152 and 153) ordered, ‘Denial of motions for relief from judgment. [He] challenges the denial of his several motions for relief from judgment. These orders may be reviewed by a panel on appeal, but are beyond the jurisdiction of the single justice.’ Accordingly, Father submitted his timely notice of appeal, and Family Court permitted the filing on 3/28/2024. Father superficially speculates that his filed notice of appeal ultimately triggered the ‘On [or about] 4/20/2024, Father was [finally allowed] to download the [secret] 12/5/2013 [gatekeeper] order from the online dockets.’ With the actual previously secret ‘gatekeeper’ order in hand that references Father’s prior otherwise discarded *pro se* filings and meticulously substantiated oppositions directly, Father has conclusive evidence to support his allegations that the docket entries in Family Court have been falsified on purpose to conceal profiteering discriminations.”

43) On 5/31/2024, the SJC ordered, “There appears to be no reason, however, why [Father] could not have pursued a direct appeal from the denial of the trial court motions (also a point made by the Appeals Court single justice). That is [Father’s] remedy, at least as to those trial court rulings; the remedy does not lie with G. L. c. 211, § 3.” However, as substantiated in his “[SJC] **Motion For Relief From Judgments Pursuant To Rule 60 Fraud On The Court**” filed on 6/2/2024, Father timely submitted two proper notices of appeals to the Family Court. Father documented that “Family Court mailed the 3/28/2024 order to Father on 4/1/2024, explicitly allowing [his] ‘Motion For Permission To File The Attached Motion For Indigency And Notice Of Appeal.’ As a repeated deception and manifested mail fraud, no notice of appeal is listed anywhere in the

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docket,” and “[The SJC] noted on 5/31/2024 that, ‘Moreover, [Father’s] generalized statements that he has been subject to, among other things, intentional and purposeful discrimination and retaliation, stemming from the underlying trial court litigation, do not form a basis for relief.’ However, once again, Father cannot be blamed for deliberately falsified dockets. Father asserted in his affidavits that ‘While Father has meticulously maintained his records by implementing extensive redundancies with every step (see his extensive reliance on verifiable Appeals Court filings adorned with date, time, and page stamps), he cannot possibly know what is hidden behind the Family Court’s publicly visible records. Therefore, Father could only use generalized statements to describe the intentional and purposeful discrimination and retaliation effects of the Family Court’s actions. With [the SJC’s] 5/31/2024 order, it is now confirmed that not even [the SJC] can see through the Family Court’s dockets to spot at least one filed notice of appeal, despite the many dangling references pointing to its existence.’ As [the SJC’s] 5/31/2024 order confirmed that Family Court is deliberately obstructing justice by routinely and continually committing federal mail fraud, falsified docket entries, and absolute and total disregard for Father’s constitutional due process and equal protection of the law rights, Father has attached his fully substantiated ‘Notice Of Appeal Raising Constitutional Questions’ to [the full SJC].’

44) Reacting to Father’s claims “Consequently, this SJC’s observation on 5/31/2024 (that no sign of direct appeal existed in the dockets) can only be explained by Family Court deliberately: a) discarding the timely notice of appeal, b) concealing that by falsifying the dockets, c) deceiving about that by committing mail fraud“ substantiated in his SJC “Petition To Correct And Prevent Ongoing Errors Pursuant To G.L.c. 211, § 3, And Due To List Of G.L.c. 151B Disparate

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Treatments And Deliberate Title VI/VII Violations Committed By The Agenda-Driven State,”
i.e., Father’s SJC record or SJ-2024-M026 entered on 8/5/2024, the State responded on 8/6/2024:
“[Father’s] Amended Complaint should be dismissed. The Commonwealth Defendants are entitled to absolute judicial immunity, which is an independently sufficient basis to dismiss all of [Father’s] claims... [Father’s] claims are barred by absolute judicial or prosecutorial immunity because they arise from: judicial rulings in custody and child support proceedings in Family Court; the prosecution of those proceedings; or decisions not to pursue alleged civil rights claims arising out of those proceedings... this judicial absolute immunity ‘is essential to impartial decision-making and to engendering public trust in the judiciary’... [Father’s] allegations regarding the Family Court relate to the court’s orders in [Father’s] child custody and support proceedings. The court’s orders are ‘actions taken from the bench,’ and are therefore protected by absolute judicial immunity... Additionally, [Father’s] claims against [the DOR] relate to the agency’s official child support enforcement duties in connection with [Father’s] Family Court proceedings. Courts have held that ‘paternity and child support enforcement activities . . . are prosecutorial in nature,’ and claims related to those activities are barred by prosecutorial immunity. As in the judicial context, prosecutorial immunity is absolute. Finally, [Father’s] claims regarding the Commonwealth, Governor Healey, and Attorney General Campbell relate to the AGO’s decision not to pursue a civil rights action related to his allegations. The [SJC] has held that absolute immunity applies to government attorneys for actions associated with their conduct of civil litigation. Therefore, [Father’s] ‘claims against the Attorney General fail regardless of any procedural deficiencies, as she is absolutely immune from civil suits regarding decisions to proceed with criminal or

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civil actions.’ Therefore, because all Commonwealth Defendants are entitled to absolute judicial or prosecutorial immunity, [Father’s] claims against them should be dismissed.”

45) While fully understanding how the deeply child-predatory, activist “feminist,” i.e., driven by the purposely discriminating “LGBTQ+” agenda, and Marxist-inspired profiteering State works (by effectively splitting the government into a visibly benevolent, but ignored, “DEI facade” and a hidden ruthlessly silencing and punishing “Deep State”) Father still did not have a direct proof.

Administrative “Deep State” Defrauds Even The SJC By Pretending To Be “Judicial”

46) Father reiterates that, as attached, the recent 3 Family Court judges have directly allowed his supporting documents to be filed 4 times on 12/4/2023, 2 times on 12/6/2023, 2 times on 1/30/2024, 2 times on 2/22/2024, 3 times on 3/12/2024, once on 3/28/2024, and once on 9/20/2024.

47) Consequently, Father mailed the 75 (3 text) + 76 (2 text) + 25 (2 text) + 70 (4 text) + 33 (3 text) + 97 (1 text) + 80 (4 text) + 56 + 1,806+ (2 text) = **2,318+ (21 text)** pages of his explicitly allowed to be filed affidavits, i.e., the flat “text” and the attached preserved supporting evidence.

48) Moreover, the judges also resisted the attorneys’ deliberately false & discriminating bullying to force Father back in jail on 1/21/2022; they reversed the endless Stalinist “guilty until proven innocent” projections by finally finding Father NOT GUILTY on 2/26/2024 (and backdating the finding to an effectively 12/3/2021), they reversed the trend of awarding unjust “legal fees” to attorneys committing deliberate perjury and even subornation of perjury, they reversed the trend of claiming “sabotaged” seek work efforts when canceling the orders for probation and entering the dismissals of the probation’s 1/11/2022 complaints for contempt on the dockets on 2/20/2024 with the justification: “[Father] having complied with the Court’s order to report to Probation.”

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49) Significantly, the judges also ordered on 2/26/2024 that “the [child support] amounts are due and owing, and the orders shall remain in full force and effect and shall accrue interest at the statutory rate. At [Mother-B’s] discretion, she may register the support order and arrears with the Department of Revenue/CSEU,” therefore maintaining Father’s right to file new complaints for modification in Family Court as his older (now student) children have not been emancipated yet.

50) In summary, Father cannot possibly complain about the Family Court’s orders, and hence, the State has been deliberately misrepresenting the controversy by claiming, “The court’s orders are ‘actions taken from the bench,’ and are therefore protected by absolute judicial immunity.”

51) Father’s objections stem from the “All other requested relief fails to be supported by facts that are not merely speculative and conclusory” justification in the 2/26/2024 judgment. Specific revealing detail is provided in the 2/22/2024 denials of his motions for relief from fraud on the court, i.e., “The Court finds no evidence of fraud, mail fraud, discrimination based on national origin as alleged, ‘employment discrimination,’ or any other basis under Rule 60 (b). The Court has reviewed the moving party’s submissions, including the 56-page attachment/affidavit facts.”

52) Father’s summarizing 56-page “Affidavit On Full Compliance With Supplemental Orders And Uncontested Facts” had no evidence attached as it was his response to the Family Court’s explicit 2/16/2024 order, i.e., “Each party shall have 10 minutes to make all arguments on all pending motions. The parties must confer on how to present their arguments accordingly.”

53) As the 56-page affidavit was merely a 10-minute “inventory” of all the never-contested facts/evidence previously mailed to the Family Court on the above 2,318+ pages of explicitly allowed submissions, the 2/22/2024 denial confirmed that none of Father’s evidence was ever considered.

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54) Father knew that a) he diligently mailed the explicitly allowed evidence, b) the Family Court received it, and c) his attached evidence was discarded before the judges reviewed his filings.

55) The identical schemes of Father's explicitly allowed mailed submissions being discarded by the Family Court happened with his a) notices of direct appeal (observed by the SJC on 5/31/2024) and b) complaints for modifications (pursuant to "There is now a difference between the amount of the existing child support order and the amount that would result from the application of the Child Support Guidelines issued by the Chief Justice of the Trial Court") filed just after "the Court finds [Father] does not have a present ability to pay, and therefore finds [him] NOT GUILTY of contempt" reversal in the 2/26/2024 judgment. As Father could not witness Family Court discarding the attachments from his mailed-in submissions, he had no proof of the acts.

56) Perhaps as a result of Father's repeated petitions to the SJC, Family Court has become more and more transparent by allowing Father to a) access his docket entries, b) download the 12/5/2013 previously secret "gatekeeper" order, c) file pleadings with explicit permissions, and then d) confirm his marked motions. Also, on 6/21/2024, Father was finally allowed to use e-filing.

57) E-filing implements a proper "handshake" protocol to confirm the steps of the submission process. Therefore, Family Court cannot continue to rely on the past "mailed-in" shenanigans.

58) On 9/20/2024, Family Court mailed an explicit order to Father, allowing him to e-file his 388 (7 text) pages affidavit fully supported by his evidence. Upon receipt of the order, he promptly attempted to e-file his submissions on 9/26/2024. However, Family Court promptly "Rejected. Cannot accept any exhibits or attachments" regarding all of Father's e-filings. The specifically targeted rejections against Father also continued on 9/30/2024, despite the Family Court having previously accepted the opposing parties' e-filed affidavits AND (the fraud-based) attachments.

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59) Father argues that these continued rejections by the Family Court are the proof of its “split-personality,” i.e., the visibly benevolent but also ignored “DEI facade” and a hidden, ruthlessly silencing, systemically defrauding and unlawfully discriminating administrative “Deep State.”

60) Moreover, the State’s recorded attempt to deceive the Superior Court by misrepresenting with purpose this now concisely proven schism and pretending that the merely “record-keeping” operations in Family Court are somehow genuine “judicial” acts (while directly contradicting the thus explicitly judicial decisions) amounts to defrauding even the SJC as no remedy against the deliberate discrimination is ever possible when the administrative “Deep State” breaks the law.

Remedy For Discrimination Is Impossible With Deliberately Discarded Evidence

61) Contradicting the SJC’s 9/26/2024 order (of Father “having adequate remedies”), concrete evidence exists that even Attorney General-assisted deliberate Rule 60 fraud (and fraud on the court) continues to occur while deceptions of “absolute judicial/prosecutorial immunity” are used to specifically conceal the thus sustained, systemic, and unlawful discriminations by the “Deep Administrative State,” i.e., by Family Court directly contradicting its own expressly “judicial” decisions and purposely violating Father’s due process and equal protection rights by blatantly discarding his evidence only to interfere with the judicial processes (i.e., find no supported facts).

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Signed under the pains and penalties of perjury.

October 13, 2024,

Respectfully submitted,
/s/ Imre Kifor
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I have no phone
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I have to move to a homeless shelter
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