Imre Kifor
[redacted]
Newton, MA 02464
ikifor@gmail.com
I have no phone
I have no valid driver's license
I have to move to a homeless shelter
https://femfas.net

January 26, 2024

Scott S. Harris, Clerk
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

SUBMITTED FOR: Imre Kifor v. Massachusetts. et al., No. 23-6398

Dear Clerk Harris,

Enclosed for filing and docketing on my behalf, please find the following mailed documents:

1. Imre Kifor's Status Affidavit On Continued Systemic Statutory Discriminations And Retaliations (with incorporated addendum),
2. Proof Of Service.

I respectfully note that the deadline set for responses to my above-captioned petition for a writ of certiorari is 1/29/2024.

Respectfully,
/s/ Imre Kifor, Pro Se

Enclosure

Cc: Katherine B. Dirks, Esq. (Assistant Attorney General), via katherine.dirks@mass.gov
Michael Xavier, Esq. (for [redacted]), via mxavier@princelobel.com
[redacted], Pro Se, via [redacted]
Caroline Hendel, Esq. (for Yale School Of Medicine), via caroline.hendel@yale.edu
Allyson R. Cady, Esq. (for LifeStance Health, Inc.), via ACady@beneschlaw.com
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John Puleo, Esq. (for Atrius Health), via jpuleo@hmdrslaw.com

No. 23-6398

IN THE

SUPREME COURT OF THE UNITED STATES

IMRE KIFOR,
Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS et al.,
Respondents.

IMRE KIFOR'S STATUS AFFIDAVIT ON CONTINUED SYSTEMIC STATUTORY DISCRIMINATIONS AND RETALIATIONS

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

1) Father's above-captioned petition directly referred to the 2/16/2023 Presidential Executive Order. Father also requested a joint review of the specific decisions from the Court of Appeals and the binding Executive Order under Rule 12.4.
2) In his petition, Father substantiated the preserved controversy from the lower courts as a "dogmatic interplay" to subvert justice based on merit and replace it with justice based on a more convenient (but also superficial) group identity.
3) Specifically, discounting Father's factual claims of systemic discrimination, the lower courts endorsed the open deception by the State that "[Father's] Title VII

claim is defective because he is not an employee of any of the Commonwealth Defendants," despite the established precedent, i.e., "Reasoning that Title VII was intended to prohibit employers 'from exerting any power [they] may have to foreclose, on invidious grounds, access by any individual to employment opportunities otherwise available to him,' the court concluded that the statute did not contemplate providing protections only in those situations where there was a direct employment relationship between the plaintiff and defendant, i.e., that of 'an employee of an employer.' The court held that, although the defendant was not the plaintiff's 'actual [or] potential direct employer,' the complaint alleged sufficient facts to state a claim against one 'who control[s] access to ... employment and who den[ies] ... access by reference to invidious criteria.' *Sibley Memorial Hosp. v. Wilson*, 488 F.2d 1338 (D.C.Cir.1973) at 1342," Lopez v. Commonwealth, 463 Mass. 696, 703 (Mass. 2012).

4) Continuing the same "group identity"-based superficial interpretation of the law, the U.S. District Court dismissed Father's referenced Civil RICO Class Action Complaint with "Kifor's complaint fails to state a discrimination claim under Title VII because he is not an employee of the state." The District Court also noted on 12/21/2023 that "it is 'crystal clear' that allowing Kifor to amend the complaint in this action could not cure the pleading deficiencies." However, based on his extensive 1,319 pages of filed factual evidence, Father was able to assert just a few weeks later to the Massachusetts Supreme Judicial Court that:

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

5) In his filing to the highest state court, Father specifically alleged statutory and systemic "Discrimination Based On National Origin And Sex," "Retaliation Against A Complaining Father," "Rule 60 (b)(6) Fraud On The Court," "Interference With Protected Rights," "Defamation To Forced Indigency To Jail Sentence," and also "Aiding And Abetting Employment Discrimination."
6) Father is attaching his open letter/affidavit respectfully mailed to The White House titled "Agenda-Driven Statutory Discriminations/Retaliations Are 'Prisoner-Like' Segregations" incorporating by reference the *pro se* text of Father's already substantiated "Status Affidavit And Memorandum Of Law On

Continued Systemic Discriminations And Retaliations" filed with the Massachusetts Supreme Judicial Court as SJ-2023-M014 on 1/13/2024.

7) To continue his desperate defenses against the now systemic and sustained "conspiracy to silence and enslave," Father has docketed his appeal of the District Court's hasty and "prisoner-like" *sua sponte* dismissal of his Civil RICO complaint with the U.S. Court of Appeals, First Circuit, as No. 24-1075.

8) Moreover, the also attached "Complaint Against State-Endorsed 'Prisoner-Like' Segregations Per 42 U.S.C. §§ 12131–12134" to U.S. Attorney Levy is a precursor for Father's defenses against the expected future rights violations.

ADDENDUM TABLE OF CONTENTS

I declare under penalty of perjury that the foregoing is true and correct.

January 26, 2024

/s/ Imre Kifor
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January 26, 2024

President Joseph Biden
The White House
1600 Pennsylvania Ave, NW
Washington, DC 20500

Agenda-Driven Statutory Discriminations And Retaliations Are "Prisoner-Like" Segregations

Dear President Biden,

In my previous open letter to The White House (and affidavit to the U.S. Supreme Court), I claimed on 1/1/2024 that Marxist equity-based ideas are grossly inadequate for any honest "rule of the law"-based justice, as not even activist feminism can morph a millionaire mother's equity into that of a poor mother.

Most importantly, I meticulously documented in my letter that while "fatherlessness" is meaningless for a now 65-year-old millionaire mother, it is crucially meaningful for my still minor but very dear children as "extreme parental alienation should be considered emotional child abuse and referred criminally."

Moreover, I reported to the Massachusetts Supreme Judicial Court on 1/14/2024 that "conclusive proof for the State deploying forced separation and extreme parental alienation of children as sustained statutory (G.L.c. 151B) retaliations came only on 1/10/2024 when the Probation Officer confirmed to me upon the Family Court orders that my minor children felt so alienated and so utterly 'fatherless' that they wanted to change even their names. These are my 'State-owned' children who never had contact with their loving father outside of the agenda-driven and deliberately retaliatory 'supervised visitations.'"

Through over 1,400 pages of diligently filed evidence, I have substantiated that agenda-driven statutory (M.G.L.c. 151B) discriminations and retaliations are behind the State's stubborn efforts to conceal and obstruct the existentially destructive effects of just such Marxist "equity-based justice" (see attached).

Due to the fast turn of events, I have now docketed the appeal of my Civil RICO class action complaint with the U.S. Court of Appeals (see attached) with the intent to reiterate the troubling federal question:

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

In my previous open letter, I indicated that my meticulously substantiated complaint in the U.S. District Court was summarily dismissed with 16 direct misrepresentations of my relevant facts. Among other things, I specifically claimed that "as the consequences of the Presidential Executive Order (effectively equivalent to mandating new **'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 base for the new 'forced deprogramming' of the masses."

The *sua sponte* dismissal immediately targeted & banished even the possibility of any existence of such an "American Gulag Of Leftovers." Moreover, the District Court flatly asserted that *"Kifor cannot fairly and adequately represent the interests of the class that he has identified"* while also acknowledging that I was a forcedly indigent *pro se* individual who had expressly waived his attorney-client privileges to specifically protect his children from the allowed predatory practices of prior million-dollar attorneys.

The **silencing and enslaving intent** behind the dismissal is stated unambiguously: *"Here Kifor has filed several unsuccessful lawsuits with allegations arising out of the same or similar events against identical or substantially similar parties. Nonetheless, the dismissal of his earlier actions has not deterred Kifor from again filing suit. Kifor's conduct rises above the level of litigiousness and qualifies as vexatious. His repeated filing of lawsuits concerning his family court matters is an abuse of the process."*

My complaint was dismissed by referring to a "gatekeeper" statute written specifically for "prisoners." As I have not committed any crimes, have never been convicted, and have never been a prisoner, I immediately objected to the court's **"prisoner-like" (but purely group-identity-based) segregation**.

The court justified on 1/22/2024 that *"To the extent plaintiff states that the in forma pauperis statute is limited to prisoners, plaintiff misunderstands the scope of cases to which this statute applies due to a clerical error in the statute. Under federal law, a court may authorize the commencement of any suit without prepayment of fees or security therefore, by a person who submits an affidavit that includes a statement of all assets such prisoner possesses... The use of the word prisoner in 28 U.S.C. 1915 (a)(1)* ***appears to be a typographical error****"* (see attached). Yet, the same statute also duly clarifies that "28 U.S.C. § 1915 (h): As used in this section, the term 'prisoner' means any person incarcerated or detained in any facility who is accused of, convicted of, sentenced for, or adjudicated delinquent for, violations of criminal law or the terms and conditions of parole, probation, pretrial release, or diversionary program."

Backed by my personal experiences, I reiterated in my petition No. 23-5932 to the U.S. Supreme Court that "In Marxism, ambiguity and inconsistency were unsurprisingly essential: 'It's on purpose! The laws are unclear for a reason. Because everybody is a criminal. So anybody can be arrested at any moment ... They've always violated something because the laws are badly written, and they seem to be written that way on purpose,'" (see The Gulag: What We Know Now and Why It Matters at 1:19:11 to 1:21:10). In my **"unprotected with no equity at all"** desperate defense, I will now submit my attached "Complaint Against State-Endorsed 'Prisoner-Like' Segregations Per 42 U.S.C. §§ 12131–12134" to the DOJ.

Respectfully,
/s/ Imre Kifor[1], Pro Se

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[1] Signed under the pains and penalties of perjury as an affidavit in support of my petition for a writ of certiorari, No. 23-6398, to the Supreme Court and my appeal, No. 24-1075, to the Court of Appeals For the First Circuit.

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January 26, 2024

Joshua S. Levy, Acting U.S. Attorney
U.S. Federal Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
USAMA.CivilRights@usdoj.gov

Complaint Against State-Endorsed "Prisoner-Like" Segregations Per 42 U.S.C. §§ 12131–12134

Dear U.S. Attorney Levy,

Substantiated by my attached "Status Affidavit On Continued Systemic Statutory Discriminations And Retaliations" filed today with the U.S. Supreme Court and "Agenda-Driven Statutory Discriminations And Retaliations Are 'Prisoner-Like' Segregations" open letter/affidavit mailed today to The White House, I continue to claim that I have been a deliberate target of statutory discriminations (based on my national origin and sex) and child-predatory retaliations by the Commonwealth of Massachusetts.

The long-term targeted discrimination and retaliations, coupled with efforts to conceal and deliberately obstruct the unlawful acts, have resulted in my purpose-induced and meticulously documented **forced indigency**. To avoid succumbing to the therefore deliberate conspiracy to outright silence and enslave me, I must make every effort possible to attend and rightfully represent myself in all court hearings.

The ongoing Family Court hearings are being held in Lowell, MA. I currently receive shelter in Newton, MA. Due to my forced indigency, I have no ability to physically transport myself the ~26 miles one way other than to walk. I diligently attempted to do just that for the hearings on 3/23/2023 (see attached).

I am 62 years old. Walking ~32 miles resulted in a paralyzing inflammation in both of my knees, so much so that I could not even stand up. Seeing a doctor was out of the question as I do not have any insurance. My health started to degrade fast without being mobile, presumably also caused by my very restricted and "poor man's" diet of bread, bread, and more bread. In my excruciating pain (driven by my ever-expanding systemic infections, inflammations, and allergies), I still could not request medical help.

The Commonwealth of Massachusetts offers no-cost health insurance. Unfortunately, it also comes with the impossible pre-condition that I **deliberately abandon and renounce my dear children**. The Family Court has knowingly refused to accept and consider my complaints for modifications. I have attempted

to modify the orders since 2018, specifically regarding my children's health insurances. Moreover, the Commonwealth receives federal reimbursements related to Child Support Enforcement ("CSE").

Accordingly, as a non-custodial parent, I am entitled by CSE to file complaints for modifications when my circumstances change. Due to the deliberate discrimination and retaliations by the entire state apparatus, my circumstances have changed dramatically. In fact, they have changed so much that even the U.S. District Court has started to hastily **segregate me as a "prisoner"** without clearly being one.

I have alleged factually substantiated Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d, *et seq.*) and Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-6107) violations as the Commonwealth continues to effectively silence me in my desperate efforts to modify the existing orders. These orders are all based on sustained fraud on the court and systemic statutory discriminations and retaliations.

The existing orders have caused not just my forced indigency but also deliberately created a **medical disability** in a manner that unnecessarily segregates me (with an implied and now long-term house arrest), in violation of Title II of the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§ 12131–12134. The Family Court denying my continued requests for assistance to attend my court hearings is an unnecessary institutionalization (implied house arrest) or segregation and constitutes an injury in fact.

Quoting from the attached "Statement Of Interest Of The United States Of America," the DOJ cites Murphy by Murphy v. Minn. Dep't of Hum. Servs., 260 F. Supp. 3d 1084, 1100 (D. Minn. 2017) ("Through the ADA and the R[ehabilitation] A[ct], Congress has elevated the segregation of individuals with disabilities to the status of a legally cognizable injury."); see also Fisher v. Okla. Health Care Auth., 335 F.3d 1175, 1181 (10th Cir. 2003) ("[T]he ADA and its attendant regulations clearly define unnecessary segregation as a form of illegal discrimination against the disabled."); Davis v. Shah, 821 F.3d 231, 263–64 (2d Cir. 2016) (holding that plaintiffs' showing that they were "at a substantial risk of requiring institutionalized care establishe[d] an injury sufficient [for their] integration mandate claim").

I have requested remote (via Zoom) access to the Family Court hearings. On 12/11/2023, the court emailed that "Judge Allen is not sitting today, but I was able to contact her. She said you could log onto Zoom tomorrow and that your motion would probably be allowed, but do not expect that you will be allowed to be on Zoom all the time, especially for a contested matter" (see attached). The DOJ asserted in its above filing that, "a request for such an accommodation is gratuitous when there is an obvious need for an accommodation." That **condition is manifestly satisfied** by the attached 12/12/2023 order.

To this effect, the DOJ cites Haddad v. Arnold, 784 F. Supp. 2d 1284, 1297–98 (M.D. Fla. 2010) (plaintiff was likely to succeed on the merits because Florida had affirmative duty "[t]o avoid the discrimination inherent in the unjustified isolation of disabled persons" by making "reasonable modifications to policies, practices, and procedures for services they elect to provide"); cf. Toledo v. Sanchez, 454 F.3d 24, 32 (1st Cir. 2006) ("Title II imposes an affirmative obligation on public entities to make their programs accessible to qualified individuals with disabilities, except where compliance would result in a fundamental alteration of services or impose an undue burden.")

Respectfully,
/s/ Imre Kifor, Pro Se