

**COMMONWEALTH OF MASSACHUSETTS**

**SUPREME JUDICIAL COURT**

SUFFOLK, ss

DOCKET No. SJC-13392

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IMRE KIFOR,

Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS,

GOVERNOR MAURA HEALY (official capacity)

ATTORNEY GENERAL ANDREA CAMPBELL (official capacity),

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

MIDDLESEX PROBATE AND FAMILY COURT,

Respondents.

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On Appeal From Single Justice Supreme Judicial Court

DOCKET No. SJ-2023-0028

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**Imre Kifor's SJC Rule 2:21 Memorandum**

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Date: 3/5/2023

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## INTRODUCTION

1. Pursuant to Supreme Judicial Court Rule 2:21, the Petitioner, Imre Kifor, ("Father"), is appealing the Single Justice denial of relief entered on 2/21/2023.
2. The denial is attached in the addendum, see A:44<sup>1</sup>.
3. "The record appendix shall be accompanied by ... a memorandum of not more than ten pages ... in which the appellant must set forth the reasons why review of the trial court decision cannot adequately be obtained on appeal from any final adverse judgment in the trial court or by other available means," SJC Rule 2:21.
4. Father filed his "Emergency Petition To Correct And Prevent Ongoing Errors Pursuant To G.L.c. 211, § 3" on 1/23/2023, R:07,191, and later updated the status with affidavits on 2/2/2023, R:715, and 2/11/2023, R:799.
5. Father's petition was based on his substantiations that a systemic and sustained conspiracy to silence & enslave Father, R:810, had been behind the retaliatory actions by the Respondents, ("State"), that directly induced Father's now fully confirmed **forced indigency**.

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<sup>1</sup>Pages of the attached addendum or the also filed record appendix are referred to by "A:" or "R:", respectively.

6. Since 1/19/2018, Father has properly and timely filed repeated parallel complaints for modifications with the Middlesex Probate And Family Court, ("Family Court"), as a testament to his continued commitment to prosecuting his child support cases that also led to the skyrocketing **\$315,000+** of in-arrears obligations.

7. The Family Court has been deliberately sabotaging Father's efforts in that regard with endless delays, "silent treatment," and by outright falsifying their dockets, A:48, in violation of G.L.c. 261, §§ 27B-D.

#### **STATEMENT OF ISSUES**

8. Addressed and preserved in the docket records, this appeal respectfully raises the following three issues:

A) Question of fact (reviewable for "clear error"):

did the Single Justice Court err on 2/21/2023 when ignoring the "entirety" of the record for the denial?

B) Question of law (reviewable *de novo*): did the

Single Justice Court err when disregarding the Family Court's repeated violations of G.L.c. 261, §§ 27B-D?

C) Question of discretion (reviewable for abuse): did

the Single Justice err when neglecting due process, equal protection, and other constitutional rights?

## STATEMENT OF THE CASE

4. Starting in 2011, the Family Court deliberately allowed the bitterly jealous and vindictive mothers to collude and simultaneously target Father with false claims based on the mothers' child-predatory fraud, defamations, and also stereotypical discriminations.

5. Notoriously cruel "activist" Harvard GALs were allowed to custom fabricate false narratives like: "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."

6. Using the GALs' evasive depositions, Father later compiled a 110 pages affidavit documenting 900+ errors in the GALs' report. However, Father was not permitted to present his unified defense of the deliberately splintered "one person, divergent sets of facts" reality of the Family Court dockets, and parallel adverse judgments were issued on 2/13 and 6/30/2014.

7. The substantiated fraud, deliberate defamation, and stereotypical discriminations by the Family Court have

also tormented Father's children and led to the four children's now **absolute and total parental alienation**.

8. The ongoing activities allowed in Family Court have thus resulted in Father's fully depleted finances and his induced forced indigency that started on 2/12/2018 when the Family Court initiated the punitive crusade against him in response to his efforts to seek relief.

9. In the now substantiated conspiracy to silence and enslave Father, the Family Court has systemically, and without proper appellate jurisdiction, sabotaged his efforts to appeal the sequence of fraud-based rulings.

10. This conspiracy intrinsically relies on knowingly violating Father's civil rights. Therefore, Father asserted in federal courts that "Massachusetts openly seeks to maximize federal reimbursements. Competing against all other states, this can be accomplished only by: (1) targeting families with more resources, (2) individually maximizing each support amount by forcefully separating children from their nonresident parents, (3) allowing fabrications of 'high-conflicts' into the cases only to incentivize the vast 'feeder network' of colluding professionals, (4) hiding the thus induced legal struggle by 'cooking' the court's

docket records, and (5) concealing any wrongdoing with protecting schemes from all appellate discovery and federal penalty inducing corrections," see R:862.

11. Father's cited reason for the U.S. Supreme Court granting his petition was plain: "by substantiating these child-predatory 'activist' schemes, Father alleges that the many federal taxpayers are being used to benefit the few state taxpayers," see R:860.

#### **STATEMENT OF FACTS**

12. Father specifically asserted that the conspiracy to silence and enslave him, by ruthlessly leveraging his children, was behind the punitive and retaliatory actions by the State as he had repeatedly requested due investigations into the matters from the State.

13. Father contended that the "association in fact" between the Family Court and the various other parties was a legitimate RICO Enterprise. The definition of the Enterprise, as it aims to maximize federal [CSE] reimbursements (along with their reinvestments in a positive feedback loop), satisfies the RICO interstate or "federal" commerce requirement. The Family Court is

the *de facto* "hub" of this Enterprise with all the other parties being the service provider "spokes."

14. The scheme behind the intent of these racketeering activities was to deceive a prepared Father in his affirmed efforts to appeal the Family Court's rulings and to conceal from and sabotage any appellate reviews of his duly filed evidence or the mere docket entries.

#### **Falsified Family Court Docket Entries**

15. Father has substantiated that the docket entries of the Family Court continue to not reflect the simple reality of his proper filings and the court's orders.

16. These inconsistencies are caused by the documented racketeering schemes that continue to be deployed in a conspiracy to silence and enslave. Specifically, G.L. c. 261, § 27B, the "Indigency Law," is arguably one of the simplest statutes as courts publish pre-formatted Motions to Waive based on it. The concise language of the statute also yields trivial steps for compliance.

17. The facts behind Father's petition combined with the recent email evidence, A:48, confirm that Father's filed requests to waive had been "referred to a judge" and yet they were also missing from the dockets, A:49.



18. Looking at those dockets, the Appeals Court still only "remains convinced that the issues [i.e., the Motion to Waive] have never squarely been presented to the judge," A:61, but **cannot know with any certainty.**

19. Despite clear-cut evidence and simple facts, the lack of any signed orders or acknowledgments by the Family Court creates an artificial ambiguity in the docket records that is even further amplified by the attorneys' purposely allowed deliberately deceptive or **flatly false** filings. For example, "Father agrees not to contact the children in any manner, phone, email, mail, in person, social media, or video conferencing," on 4/24/2019, and the "Defendant's Motion to Dismiss Plaintiff's Amended Complaint for Modification," on 3/3/2023, A:80, were both flatly false docket entries.

#### **"Men Can Get Pregnant" Political Agenda**

20. Responding to Father's numerous petitions, this Court continued to dismiss with threats his inquiries of "has the deliberate withholding of Father's timely filed oppositions from the Family Court's docket entries ultimately caused the direct preclusion of any appellate reviews of the Family Court's judgments?"

21. Despite the still raging “men can get pregnant” federal debate, this State has already apparently **declared its independence** by “double protecting rights during a time of federal constitutional upheaval.”<sup>2</sup>

22. Loudly “double-protecting” a negligible minority is legally cost-effective in the much bigger context of the legislated “maximized federal reimbursements,” otherwise any double-protection is legally wasteful.

23. Moreover, any protection for “men who cannot get pregnant” would directly lower the already maximized federal reimbursements. As Father has complained about the deliberate “castration of young American boys” by perjured sex-obsessed child predator activists, R:849, Father has become “dangerous” regarding this State’s objectives to enhance the importance of the “men get pregnant” agenda aimed at subverting our federal law.

24. Therefore, as the State now openly asserts that “men can get pregnant,” and Father is undoubtedly not a man who could ever get pregnant, Father ceases to exist as a man worthy of any protection by the State.

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<sup>2</sup> See [Scott L. Kafker, State Constitutional Law Declares Its Independence: Double Protecting Rights During a Time of Federal Constitutional Upheaval, 49 Hastings Const. L.Q. 115 \(2022\).](#)

25. Moreover, by deliberately allowing the falsifying of docket entries, the State can now shift the blame of knowingly violating laws to suborning perjury onto the two mothers who thus aided and abetted the "Father 'willfully' neglected to pay child supports" findings.

#### ARGUMENT

26. Facing incompetence to deal with harsh economic realities, states have reliably resorted to focusing only on severely restricted subsets of their issues.

27. Specifically, all communist tyrannies, directly rooted in the more sophisticated and much larger scale Russian "white slavery" sick principles (as opposed to those of the American naive & direct "black slavery"), have successfully solved the problem of those millions of "dangerous" citizens who would not comply with the "comrade" forced "preferred pronouns" by ordering them to the Gulags, the major unfree labor-camps instrument of political repression in the vast "Soviet land."

28. When ignoring the "entirety" of Father's record, disregarding the Family Court's repeated deliberate violations of state and federal law, and neglecting Father's due process, equal protection, and other

constitutional rights, the Single Justice repeated his **clear declarations** as per "when dealing with sovereign exemption from judicial interference in the vital field of financial administration a clear declaration of the state's intention to submit its fiscal problems to other courts than those of its own creation must be found," see Great Northern Ins. Co. v. Read.

### **CONCLUSION**

29. The mere presence of "men who cannot get pregnant" on the Family Court's dockets provides the State with legislated profiteering opportunities from open-ended federal reimbursements. A superficial effort to loudly focus on "double protecting" the few "men who can get pregnant" deceives from this child-predatory and also unconstitutional practice and effectively renders the existence of thus to-be-silenced and enslaved targets outside of the applicability of any laws and forces them into the grip of a newly emerging American Gulag.

30. In this context of deliberately falsified and effectively obfuscated docket records, that even the Appeals Court cannot positively rely on immediately after even trivial violations, it is thus **manifestly impossible** to start a "dangerous" case in the Family

Court or to later adequately appeal in any way a final decision thus predetermined to be an adverse judgment.

Signed under the pains and penalties of perjury.

March 5, 2023

Respectfully submitted,

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