

23-6398
No. _____

ORIGINAL

FILED

DEC 26 2023

OFFICE OF THE CLERK
SUPREME COURT, U.S.

IN THE
SUPREME COURT OF THE UNITED STATES

IMRE KIFOR,
Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS et al.,
Respondents.

On Petition For A Writ Of Certiorari To
The United States Court Of Appeals For The First Circuit
No. 23-1008

IMRE KIFOR'S PETITION FOR WRIT OF CERTIORARI

December 24, 2023

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80
QUESTIONS PRESENTED

ESJS 2 2 DEC

- 1) 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 Order¹ results in the predictable “equity for the rich or equity for the poor mother?” dilemma as “equity for all” is impossible by Marxist design. Is the mandate to selectively “advance equity” (for a select few) Constitutional?

- 2) 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?

¹ 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/>.

LIST OF PARTIES

All parties **do not** appear in the caption of the case on the cover page.

The list of all parties to the proceedings in the court whose judgment is the subject of this petition is as follows:

- 1) The Commonwealth Of Massachusetts,
- 2) Middlesex Division of the Probate and Family Court Department,
- 3) Massachusetts Department of Revenue, Child Support Enforcement Division,
- 4) Yale School Of Medicine (Yale University),
- 5) The Counseling Center Of New England (k/n/a LifeStance Health, Inc.),
- 6) Atrius Health, Inc.

RELATED CASES

1. Duchesne v. Kifor, MI07D3172DV1, Mass. Middlesex Probate & Family Court. Ongoing.
2. Oulton v. Kifor, MI11W0787WD/MI11W1147WD, Mass. Middlesex Probate & Family Court. Ongoing.
3. Oulton v. Kifor, MI22C1112CA & MI22C1113CA, Mass. Middlesex Probate & Family Court. Ongoing.
4. Conlin v. Kifor, 1811-RO-147, Mass. Lowell District Court. Relief denied 3/2/2018.
5. Duchesne/Oulton v. Kifor, 2019-J-0527, 2020-J-0007, 2020-J-0100, 2020-J-0147, 2020-J-0279, 2020-J-0280, 2021-J-0079 and 2021-J-0080, Mass. Single Justice Appeals Court. Petitions immediately denied.
6. Kifor v. Commonwealth et al., 1:20-cv-11601-PBS, U.S. District Court for the District of Massachusetts. Judgment entered 10/6/2020.
7. Kifor v. Duchesne & Oulton, 2081CV00109 and 2281CV02933, Mass. Middlesex Superior Court. Dismissed 10/15/2020 and 11/24/2023.
8. Kifor v. Duchesne/Oulton, DAR-28508, DAR-28518, and DAR-28519, Mass. Supreme Judicial Court. Petitions denied 11/30/2021.
9. Kifor v. Commonwealth et al., 1:21-cv-11968-IT, U.S. District Court for the District of Massachusetts. Judgment entered 1/3/2022.

10. Kifor v. Commonwealth et al., SJ-2022-0041 & SJC-13263, Mass. Supreme Judicial Court. Judgments entered 4/1/2022 and 6/22/2022.
11. Kifor v. Duchesne/Oulton, paired 2021-P-0503, 2021-P-0825, 2021-P-0901, and 2021-P-0902, Mass. Appeals Court. Judgment entered 6/23/2022.
12. Kifor v. Commonwealth et al., 2181CV00921, Mass. Middlesex Superior Court. Judgment entered 8/23/2022.
13. Kifor v. Duchesne/Oulton, FAR-28962, and FAR-28963, Mass. Supreme Judicial Court. Petitions denied 9/13/2022.
14. Duchesne/Oulton v. Kifor, 2021-J-0606, 2021-J-0607, 2022-J-0479, and 2022-J-0480, Mass. Single Justice Appeals Court. Petitions immediately denied.
15. Kifor v. Commonwealth et al., SJ-2022-0193 & SJC-13310, Mass. Supreme Judicial Court. Judgments entered 6/27/2022 and 10/13/2022.
16. Kifor v. Commonwealth et al., 1:22-cv-11141-PBS, U.S. District Court for the District of Massachusetts. Judgment entered 11/22/2022.
17. Kifor v. Commonwealth et al., SJ-2022-0271 & SJC-13339, Mass. Supreme Judicial Court. Judgments entered 9/30/2022 and 12/1/2022.
18. Kifor v. Commonwealth et al., 1:22-cv-11948-PBS, U.S. District Court for the District of Massachusetts. Judgment entered 12/7/2022.
19. Kifor v. Commonwealth et al., SJ-2022-0380 and SJ-2022-0407, Mass. Single Justice Supreme Judicial Court. Judgments entered 12/9/2022.

20. Kifor v. Duchesne/Oulton, 2023-J-0054 and 2023-J-0055, Mass. Single Justice Appeals Court. Petitions repeatedly denied 2/2/2023 and 3/1/2023.
21. Kifor v. Commonwealth et al., 23-1013, U.S. Court of Appeals, First Circuit. Judgment entered 3/6/2023.
22. Kifor v. Commonwealth et al., SJ-2023-0028 & SJC-13392, Mass. Supreme Judicial Court. Judgments entered 2/21/2023 and 5/16/2023.
23. Kifor v. Massachusetts, et al., 22-7115, U.S. Supreme Court. Petition denied 5/18/2023.
24. Kifor v. Commonwealth et al., SJ-2023-0122 & SJC-13427, Mass. Supreme Judicial Court. Judgments entered 5/1/2023 and 8/8/2023.
25. Kifor v. Duchesne/Oulton, 2023-J-0500 and 2023-J-0501, Mass. Single Justice Appeals Court. Petitions denied 9/12/2023.
26. Kifor v. Commonwealth et al., 23-1008, U.S. Court of Appeals, First Circuit. Judgment entered 8/4/2023. Petition for Rehearing denied 10/16/2023.
27. Kifor v. Massachusetts, et al., 23-5932, U.S. Supreme Court. Ongoing, docketed on 11/1/2023, scheduled for 1/5/2024 conference.
28. Kifor v. Commonwealth et al., 1:23-cv-12692-PBS, U.S. District Court for the District of Massachusetts. Ongoing, docketed on 11/8/2023.
29. Kifor v. Duchesne/Oulton, 2023-J-0679 and 2023-J-0680, Mass. Single Justice Appeals Court. Petitions denied 11/27/2023.

30. Kifor v. Duchesne/Oulton, Restraining orders, Mass. Newton District Court.

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31. Kifor v. Commonwealth et al., Mass. Supreme Judicial Court. Filing of Petition

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3) Baystate Alternative Staffing, Inc., 163 F.3d at 675	
4) Bercume v. Bercume, 428 Mass. 635 (Mass. 1999)	
5) Boston Edison Co. v. Board of Selectmen of Concord, 355 Mass. 79, 83 (Mass. 1968)	
6) Briggs v. Carol Cars, Inc., 407 Mass. 391 (Mass. 1990)	
7) Brown v. Gerstein, 17 Mass. App. Ct. 558 (Mass. App. Ct. 1984)	
8) Carey v. Piphus, 435 U.S. 247 (1978)	
9) Carter v. Housing Authority, 450 Mass. 626 (Mass. 2008)	
10) Cashman Equip. Corp. v. Penny, 19-P-1814 (Mass. App. Ct., 2021)	
11) Clyatt v. U.S., 197 U.S. 207 (1905)	
12) Comey v. Hill, 387 Mass. 11, 19 (Mass. 1982)	
13) Commonwealth v. Alphas, 430 Mass. 8 (Mass. 1999)	
14) Commonwealth v. Hatch, 438 Mass. 618, 623 (Mass. 2003)	
15) Dawson v. Equity Investment Group, No, No. 2001517 (Mass. Cmmw. Aug. 11, 2006)	

² The relevant text of the cited cases and statutes appears in Appendix H. *Passim* is implied throughout.

- 16) Edelman v. Jordan, 415 U.S. 651, 677 (1974)
- 17) Edwards v. Aetna Life Ins. Co., 690 F.2d 595, 599 (6th Cir. 1982)
- 18) Fisher v. University of Texas at Austin, 570 U.S. 297, 331 (2013)
- 19) Fitzpatrick v. Bitzer, 427 U.S. 447 (1976)
- 20) Furtado v. Furtado, 380 Mass. 137 (Mass. 1980)
- 21) Griffin v. Breckenridge, 403 U.S. 88 (1971)
- 22) In re Birchall, 454 Mass. 837, 838-39 (Mass. 2009)
- 23) J.A. Sullivan Corp. v. Commonwealth, 397 Mass. 789, 792, 494 N.E.2d 374 (1986)
- 24) Jackson v. Birmingham Bd., 544 U.S. 167, 168 (2005)
- 25) Jinks v. Credico (U.S.) LLC, No. SJC-13106, (Mass. 2021)
- 26) Johnson v. Commonwealth, 977 N.E.2d 541, 544 (Mass. 2012)
- 27) Judge Rotenberg Educ. v. Comm. of the Dep. of M. R, 424 Mass. 430, 443 (Mass. 1997)
- 28) Kendall v. Selvaggio, 413 Mass. 619 (Mass. 1992)
- 29) LaLonde v. Eissner, 405 Mass. 207, 213 (Mass. 1989)
- 30) Lamoureux v. Supdt. Mass. Correctional Inst. Walpole, 390 Mass. 409 (Mass. 1983)
- 31) Lopez v. Mass., 588 F.3d 69, 86 (1st Cir. 2009)
- 32) McHugh v. Commonwealth, 97 Mass. App. Ct. 1104 (Mass. 2020)
- 33) Mireles v. Waco, 502 U.S. 9, 11-12 (1991)

34) O'Brien v. DiGrazia, 544 F.2d 543, 546 n.3 (1st Cir. 1976)

35) Otis v. Arbella Mutual Insurance Company, 443 Mass. 634, (Mass. 2005)

36) Parrell v. Keenan, 389 Mass. 809 (Mass. 1983)

37) Pelican Production Corp. v. Marino, 893 F.2d 1143 (10th Cir. 1990)

38) Pennhurst State School Hosp. v. Halderman, 465 U.S. 89, 155 (1984)

39) Pollock v. Williams, 322 U.S. 4, 18 (1944)

40) Pulliam v. Allen, 466 U.S. 522, 541-42 (1984)

41) Rasmy v. Marriott Int'l, 952 F.3d 379, 389 (2d Cir. 2020)

42) RCN-BecoCom, LLC v. Commissioner of Revenue, 443 Mass. 198, 204
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43) Rockdale Management Co. v. Shawmut Bank, N.A., 418 Mass. 596, 598
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44) Sahin v. Sahin, 435 Mass. 396 (Mass. 2001)

45) Salvesen v. Salvesen, 370 Mass. 608 (Mass. 1976)

46) Sax v. Sax, 53 Mass. App. Ct. 765 (Mass. App. Ct. 2002)

47) Stump v. Sparkman, 435 U.S. 349 (1978)

48) Sullivan v. Chief Justice, 448 Mass. 15, 24 (Mass. 2006)

49) Swallows v. Barnes Noble Book Stores, Inc., 128 F.3d 990, 993 n.5 (6th Cir. 1997)

50) Trillium, Inc. v. Cheung, 11-P-727 (Mass. Feb. 21, 2012)

51) U.S. v. Ballek, 170 F.3d 871 (9th Cir. 1999)

52) U.S. v. Smith, 278 F.3d 33, 40 n.5 (1st Cir. 2002)

53) U.S. v. Williams, 121 F.3d 615, 620-21 (11th Cir. 1997)

54) Winthrop Corp. v. Lowenthal, 29 Mass. App. Ct. 180 (Mass. 1990)

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IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

The Petitioner, Imre Kifor (“Father”), respectfully prays that a writ is issued to review the decision of the U.S. Court Of Appeals, First Circuit (“USCA1”) below.

OPINIONS BELOW

The unpublished decision of USCA1 to review the merits appears in Appendix A.

The decision is inevitably contextualized by constraints presented in Appendix B:

1. [2/16/2023 Presidential] Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through The Federal Government,
2. “State Constitutional Law Declares Its Independence: Double Protecting Rights

During a Time of Federal Constitutional Upheaval”¹ by Scott L. Kafker, Associate Justice of the Massachusetts Supreme Judicial Court (“SJC”).

JURISDICTION

The date on which USCA1 decided the appeal was 8/4/2023. Father’s petition for a rehearing was denied on 10/16/2023, and a motion to stay the mandate was denied again on 11/22/2023. The date of the constraining [Presidential] Executive Order was 2/16/2023. These appear in Appendices A and B. Father seeks a joint review of

¹ See https://repository.uclawsf.edu/hastings_constitutional_law_quarterly/vol49/iss2/4/

the USCA1 decision and the unequivocally binding Executive Order under Rule 12.4. The jurisdiction of this Court is thereby invoked under 28 U.S.C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- 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),
- Racketeer and Corrupt Organizations Act (“RICO”), 18 U.S.C. §§ 1961-1968,
- Attempt and Conspiracy: (Postal Service) Mail Fraud, 18 U.S.C. §§ 1341, 1349,
- Unlawful discrimination under Massachusetts G.L.c. 151B,
- Violations of Massachusetts “entitled to appeal” G.L.c. 215, § 9,
- Violations of the Massachusetts Indigency Laws, G.L.c. 261, §§ 27A-D.

STATEMENT OF THE CASE

- 1) Father's herein third petition for a writ of certiorari is a continuation of his first petition placed on this Court's docket under No. 22-7115 on 3/27/2023 and his second petition docketed as No. 23-5932 on 11/1/2023. Father's second (now current) petition is scheduled for this Court's conference on 1/5/2024. As the underlying facts of Father's petitions are identical, Father respectfully requests pairing these cases should this Court decide to review the underlying matters.

- 2) The to-be-reviewed decision of USCA1 (“23-1008”) is an appeal of the *sua sponte* dismissal of Father’s first Civil RICO complaint. Appendix C presents the procedural history of the appeal. Relevant substantiating parts of the SJC dockets are also included as manifestations of an alleged **dogmatic interplay**.
- 3) Father’s petition No. 23-5932 in this Court substantiated that the SJC decision on 8/8/2023 (“SJC-13427”) was the direct cause of action for Father’s second (thus renewed) Civil RICO Class Action Complaint docketed as 1:23-cv-12692 in the U.S. District Court on 11/8/2023. Appendix D is its procedural history.
- 4) According to the new cause of action, specifically for statutory discriminations, 1:23-cv-12692 cites “*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.”
- 5) Appendix D contains the text of the new complaint and supporting affidavits. Moreover, these are substantiated by the referenced (and herein implied) 387 and 251 pages of relevant exhibits, respectively, also submitted to the DOJ.
- 6) Furthermore, Father has filed additional timely complaints with the relevant federal and state governments and agencies in compliance with the above-cited anti-discriminatory statutes. These are attached as affidavits in Appendix F.

7) The new complaint establishes that the claimed discriminatory and retaliatory acts and conduct were identical to the substantiated RICO prohibited activities.

8) The new evidence, therefore, directly contradicts the claims made for 23-1008 on 2/10/2023 by the Respondent Commonwealth of Massachusetts (“State”):

“The Commonwealth Defendants have sovereign immunity from plaintiff Imre Kifor’s claim, which seeks civil relief under the Racketeer and Corrupt Organizations Act (‘RICO’), 18 U.S.C. §§ 1961– 1968.

Accordingly, this Court lacks jurisdiction over the claim, and [the] appeal should be dismissed, or the District Court order summarily affirmed.”

9) Accordingly, Father’s new complaint asserts by reference that Congress has abrogated the State’s sovereign immunity for the cited discrimination statutes.

10) 23-1008 was issued days before SJC-13427, on 8/4/2023 vs. 8/8/2023. Hence, direct causality (i.e., from 23-1008 to SJC-13427) can be plausibly inferred as the ultimate “silencing” of Father’s substantiated prior Civil RICO allegations.

11) Inverted direct causality (i.e., from SJC-13427 to 23-1008) cannot be inferred.

12) Hence, Appendix C presents the essentials of the SJC-13263, SJC-13310, SJC-13339, and SJC-13392 decisions (dated 6/22, 10/13, 12/1/2022, and 5/16/2023, respectively). Trivial textual interpretation of the decisions immediately yields the unambiguous conclusion that SJC-13427 is little more than an **“endlessly circular”** deflection of Father’s now substantiated claims elaborated below.

13) Therefore, Father asserts that SJC had made all of the above decisions as early as 6/22/2022, predating even the 2021-P-503/901/902 paired appeals finalized on 6/23/2022, and weeks before Father could submit his substantiated original Civil RICO Class Action Complaint to the U.S. District Court on 7/13/2022.

14) Falsifiability means that “if evidence that contradicts a theory comes to light, the theory itself is either modified or discarded.” Unappealable decisions (that are not falsifiable) are purely doctrine and ideology-based or trivially dogmatic.

15) As SJC-13427 is seemingly conditioned only by the many parties’ conveniently flexible group (or “fluid”) identities entirely outside of (any) Father’s control, it is irrelevant if a thus prejudged SJC-13427 came days before or after 23-1008.

16) Consequently, the deliberately delayed and meticulously informed 23-1008 was also conditioned by the dogmatic interplay between all the prior SJC decisions.

Narrow And “Dogmatic Interplay”-Specific Scope

17) While Father’s three petitions for a writ are self-contained, all previously filed documents still apply as nothing has changed in the underlying affirmatively and consistently claimed or asserted facts. Therefore, Father reiterates his note: “A list of presented exhibits cumulatively representing 10,000+ pages of e-filed documents was already filed with the U.S. Court of Appeals, First Circuit.”

18) Nevertheless, this petition is not an attempt to address or to relitigate any of the minute details of the various lower courts’ decisions. The narrow and specific scope of this petition is the core of the now “endlessly circular” SJC decisions:

- a) SJC-13427: “*to the extent [Father] challenges the entry of interlocutory ‘gatekeeper’ orders... he could seek reconsideration of those orders or avail himself of the procedures described in G.L.c. 231, § 118*” -- which is not possible in the purposeful absence of the orders as affirmed by the Massachusetts Single Justice Appeals Court on 9/12 and 11/27/2023;
- b) “*to the extent he challenges the entry of any final order of the Family Court, he may appeal from any such order*” -- which is not possible in the purposeful absence of any final orders or judgments, despite repeated motions for summary judgments on 4/26/2022 and 10/9/2023;
- c) “*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*” -- which is precisely what Father has been attempting to do since 2018, consistently on 1/19 & 12/17/2018; 4/24, 10/21 and 11/4/2019; 1/10/2020; 3/8 and 6/13/2021; 2/26, 4/10, 6/8, 8/6 and 12/17/2022; 5/16, 8/8, 11/29 and 12/1/2023.

19) The “endlessly circular” claim is substantiated by the above SJC “deflections” contrasted with Father’s meticulously filed prior facts and statements: “All of Father’s relevant evidence has been fully communicated and readily accessible as Father had e-filed his entire collection with the Appeals Court. Therefore, the Family Court’s ‘gatekeeper orders,’ while unappealable, serve as secretive instruments to conceal the substantiated [Rule 60] fraud on the court.”

20) As no adequate routes exist for relief, the existentially silenced and enslaved Father had no choice but to, yet again, renew his “Petition To Correct And Prevent Ongoing Errors” to the SJC on 12/18/2023. Appendix E presents the submission respectfully requesting declarations that the substantiated deliberate violations by the lower courts interfere with the regular execution of the laws.

21) As this “endless circularity” is synonymous with the famous statement by Nazi propaganda minister Joseph Goebbels that “if you repeat a lie often enough it becomes the truth,” the herein-alleged dogmatic interplay (or “**equity-based**” **justice**, see below) between the USCA1 and SJC decisions has resulted in the continued deflection and invalidation of all the meticulously presented facts.

Reiterated Case Details

22) Father has four children from non-overlapping, long-term, and fully committed relationships: two children (“Twins”) with former wife Barbara A. Duchesne (“Mother-B”) and another two younger children (“Siblings”) with former fiancee Cynthia S. Oulton (“Mother-C,” and also collectively “Mothers”).

23) Mothers initiated colluding and simultaneous child-custody and child-support-related lawsuits against Father under false and maliciously fraudulent pretenses in the Middlesex Probate and Family Court (“Family Court”) in May 2011.

24) Immediate parallel Family Court actions ensued that lasted three years.

25) Family Court awarded Mother-B secondary support only in 2014, three years after Mother-C's primary, despite the now "Whole Foods cashier" millionaire Mother-B's relentless efforts to gain the primary or dominating child supports.

26) Family Court still allowed notorious "activist" psychologist Harvard Guardian *ad Litem* ("GALs") to fabricate false and infantile QAnon-style narratives:

"[Father's daughter] is afraid the father will 'put suction cups on her feet and take her out the window,' and [Father's son] is afraid the father would 'put him in boiling water' if he went back in the father's care."

27) Using the GALs' evasive depositions, Father compiled a 110-page affidavit meticulously documenting 900+ deceptions and errors in the GALs' report.

28) Father was still not permitted to present his unified defense of the deliberately splintered "one person, divergent sets of facts" reality of the three Family Court dockets. Biased parallel judgments were issued on 2/13/2014 and 6/30/2014.

29) Family Court went to extreme lengths to prohibit Father from filing evidence and calling witnesses contradicting the superficial claims that Father "had his day in court." Specifically, Family Court noted in the 6/30/2014 judgment:

- "On December 5, 2013, the Court (Donnelly, J.) denied Father's request to submit additional evidence. The Court provided the following rationale:
- 'I specifically find that the value of any evidence received from mental health treaters is outweighed by the prejudice which would be supposed by

[Mother-B] in light of [Father's] prior vigorous assertion of privilege and [Mother-B's] inability to conduct discovery regarding such witness(es).””

30) However, that **12/5/2013 denial** was never actually communicated to Father.

31) Moreover, as the routinely falsified “secretive” new docket entries also prove, the 12/5/2013 denial was not entered on the Family Court’s docket until 7/15/2014, rendering any later evidentiary restrictions simply unappealable.

32) Since then, the substantiated fraud, deliberate defamation, and stereotypical discrimination by Family Court have tormented Father’s dear children and predictably led to the children’s now absolute and total parental alienation.

33) Father’s children were first fully isolated from him to forcefully silence Father from complaining. Then they were sent out of state to be illegally medicated and actively brainwashed against Father. They were tortured with unnecessary “cancer surgery” for court purposes (and paid with fraudulent insurance) and then “interrogated” in school (so that they “cried”). And finally, to forcefully renounce their dad against their wishes, perjury was suborned on the children.

34) The fabricating GALs went on to lead the American Psychological Association and the “Pediatric Gender Program” at Yale after repeatedly lying to the courts.

35) The retaliations started in earnest after Father emailed the State in early 2018: “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 their ‘emerging eugenics movement,’ started with

castrating the hated ‘inferior’ minorities (for clarity, I grew up as a 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.”

36) Through the last 20+ hearings, Family Court has pointedly rejected all of the evidence regarding even Father’s supervised visitations (the 14 monitors never complained about his **500+** visits with the children), flatly denying the sole trial exhibit about Father having to end the visits to protect his then crying children.

Concealed Forced Indigency

37) Father was first ordered to pay any child support in June 2011, more than 12 years ago. Between then and January 2018, when Father first approached the Family Court to seek modifications and relief, he never missed nor was ever late with his ordered ~\$5,000 per month support obligations for his children.

38) As none of Father’s sustained, years-long efforts (including his ongoing full-time professional software engineering work) have been able to solve Father’s extensively documented induced indigency, he has ever diligently attempted to properly and timely appeal the wrongful stream of interdependent rulings.

39) The ongoing activities allowed in Family Court also resulted in Father’s fully depleted finances and his now thus **forced indigency** that started on 2/12/2018 when Family Court initiated a punitive crusade against him in response to his efforts to seek relief. As Father had been alleging child-predatory “mental

health” fraud, driven by the openly encouraged discriminatory activism, Father was labeled “dangerous,” then silenced, and subsequently sentenced to jail.

40) Father has provided the Family Court with his comprehensive, verifiable, and voluntary financial disclosures and his duly submitted job applications (800+ in 2019 and 1,020+ since 12/6/2021) to substantiate his forced indigency claims.

41) Father’s deliberately induced, and thus intractable, indigency entails both a lack of assets and a purposely denied ability to earn a living. As a result, the Family Court repeatedly invalidated these two critical defining components of Father’s condition when continually ignoring or denying his affidavits of indigency.

42) Rejecting the consequences of the stereotypically discriminatory activism, only to stubbornly conceal the herein substantiated profiteering racket, Family Court refused to investigate the substantiated causes of Father’s forced indigency.

Conspiracy To Silence And Enslave

43) Father’s forced indigency is intractable. The resulting controversy and induced judicial deadlock are thus significant. The act of any employer hiring Father (without preemptively covering his now \$360,000+ of in-arrears obligations for his four children) would immediately deny Father’s ability to perform any of his duties as his income needed for survival would effectively be all garnished.

44) Moreover, after systemically denying Father’s free speech, due process, and equal protection rights, Family Court continued to issue “guilty” orders and judgments for the indigent Father’s “willful” nonpayment of child supports.

45) Subsequently, Father also substantiated a sinister and child-predatory financial motive that serves as a plausible reason for the stubborn efforts by the Family Court to directly and forcefully conceal the acts and decisions in these matters.

46) Father contended that the “association in fact” between Family Court and the various other parties was a legitimate RICO Enterprise. The definition of the Enterprise, as it aims to maximize federal reimbursements (along with their reinvestments in a clear positive feedback loop), satisfies the RICO interstate or “federal” commerce requirement. Family Court is a *de facto* “hub” of this Enterprise, with all the other parties being the service provider “spokes.”

47) Family Court has thus leveraged the parallel cases to either a) force Father into involuntary servitude (by ordering Father to seek jobs that could not support him in the future) or b) sentence Father with no intentions to address any of the direct causes of his indigency. Specifically, Family Court even suspended Father’s driver’s license while ordering him to get “minimum wage” jobs.

48) In the now substantiated conspiracy to silence and enslave Father, Family Court systemically (without proper jurisdiction) obstructed Father’s appeals.

49) As per our rights for free speech, including “to petition the government for a redress of grievances,” Father has repeatedly requested investigations into these matters by the State. Father also substantiated the above sinister child-predatory and financial motive that serves as a reason for the stubborn efforts to directly conceal the acts and decisions in the matters by the Family Court.

50) The Family Court's deliberate and severe evidentiary restrictions on Father's modification actions, coupled with allowing and even encouraging endlessly filed complaints for contempt against him, have rendered him unemployable.

51) Accordingly, Father sought Mass. G.L.c. 211, § 3, relief from the deliberately child-predatory and subversionary "public nuisance" activities of the State, which were continually not according to the course of the common law and which court proceedings were not otherwise reviewable by motion or appeal.

52) Father pleaded that immediate and meaningful relief was necessary "to prevent the State from undermining the rule of law and to ensure that the citizens of the Commonwealth may safely nurture and care for their children and families."

53) Father specifically claimed that a systemically discriminatory and sustained conspiracy to silence and enslave him by ruthlessly leveraging his four children against him was behind all the punitive and retaliatory actions by the State.

54) Moreover, Family Court continued to deliberately sabotage Father's efforts to modify the matters when silently implying an unappealable denial of the costs to serve summonses in statutory violation of Mass. G.L.c. 261, §§ 27B-D.

55) In summary, to continue with the conspiracy to silence and enslave Father, Family Court chooses to both a) block the prosecution of Father's employment discrimination matters (by denying service of summonses) and b) sidestep any appeals caused by notifying Father of the denials of his thus forced indigency.

56) Therefore, Father moved SJC to certify the below **three questions** as per his feedback: “you are not judged on technical merits by engineers; you are judged purely on legal merits (and risks) of your open lawsuits, and only by lawyers.”

A - Sustained Rule 60 Fraud On The Court

57) Did Family Court start a systemic Rule 60 Fraud On The Court by falsifying the court’s docket entries in a defamatory, discriminatory, and deeply child-predatory fashion in 2013 and 2014, only to conceal medical evidence of the sustained activist “feminist” child abuse and torturing across state lines?

58) All conspiratorial and fraudulent activities alleged in the matters share the same pattern: Mothers have claimed that they had acted to “protect the children” but knew all along that the children were being deliberately harmed. Mothers wanted Father to believe their claims so Father would voluntarily agree with Mothers’ self-serving manipulations. Father felt that Mothers “owned” the children (as he cannot ever get pregnant), so he complied with the demands (and orders) to his ultimate detriment: Father’s now-induced unemployability.

59) Father has now substantiated that docket entries in Family Court continue to distort the reality of his duly submitted filings and the court’s orders. The inconsistencies are directly caused by the now-documented racketeering schemes deployed on purpose in a conspiracy to silence and enslave Father.

60) On 4/21/2022, Father filed his “Memorandum Of Law In Support Of Motion To Certify Three Legal Questions” with the SJC, see Appendix C. In it, Father

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.”**

B - Systemic Preclusion Of Appellate Reviews

- 61) Has the apparently 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, e.g., the 2/3/2014 specific order to strip the protective Father’s legal custody of his [dear] Twins?
- 62) Despite the endless powerful denials by SJC, the facts of these matters persist: crucial sequences of fraud-based rulings by Family Court have never been reviewed as the “ordinary appellate process” had been deliberately undermined and sabotaged only to conceal the deeply child-predatory fraud on the court.
- 63) The specific unappealable rulings are dated as follows: 12/5/2013, 6/13/2019, 10/21/2019, 12/6/2019, 1/21/2020, 6/23/2021, 12/3 & 6/2021, and 1/12/2022.
- 64) Father was either not notified of the rulings, his timely and proper notices of appeals were ignored, his affidavits of indigences were denied without any notice sent, or the order was masquerading as “temporary,” yet it was final.
- 65) As no “adequate alternative remedies” exist for Father, specifically regarding his purely retaliatory and existentially damaging jail sentence (for a forcedly

indigent Father not being able to pay \$255 on 10/21/2019), he filed a Pardon Petition with the Massachusetts Governor's Executive Council on 12/5/2022.

66) Father's proper access to the appeals process, i.e., Mass. G.L.c. 215, § 9, was repeatedly denied without explanation by Family Court, and Father suffered an injury to this property right. Even the Chief Justice of the Family Court noted to Father on 3/6/2019: "If you believe that a final decision in your case is legally wrong, you may have a right to appeal the decision. There is also a right to appeal some types of orders that are not final, called interlocutory orders."

C - Conspiracy To Violate Civil Rights

67) Have the Respondents conspired against Father's constitutional rights when systemically defrauding and defaming him and intently discriminating against him in an activist "feminist" manner, specifically through the child-abusive leveraging of Father's four children against him by means of forced isolation?

68) Counting on a layman's Father having no chance to stay legally afloat, Family Court did not need to respect Father's constitutional rights or existential crisis.

69) Father's filings were easy to ignore, delay, deny, dismiss, etc., for years, and the ordered "in-person" parallel contempt hearings, purposely delayed to 12/3 and 6/2021, were staged to muzzle Father by endlessly repeated jail sentences.

70) The intent was clear, as Father being physically present in one hearing would have rendered him guilty of contempt in the other (by him "diverting" money).

71) The obsessive “seek work” court orders (along with the secretive, ambiguous, endlessly fabricated, and unreviewable contempt actions) are reflective of the Family Court’s **autocratic intentions to absolutely control** not only Father’s employment but also his existence. And to such a degree that Father would be forced to disobey orders somehow and conveniently end up silenced in jail.

72) Father was not notified of the Family Court’s denials of his many attempts to substantiate his claims, therefore allowing and encouraging systemic child-predatory fraud, defamation, and sustained stereotypical discrimination. The Family Court’s scheme to a) block, invalidate, and deny the submission of any “inconvenient” evidence and then b) preclude any subsequent appeals reviews of such denials by keeping the actual denials secret has proven to be routine.

STATEMENT OF FACTS

73) Father is a software engineer with a computer science/mathematics graduate degree. Father has worked all his life for his own software companies. Father sold one for \$25M in 2000, with himself as founder/sole software developer.

74) Despite direct Family Court orders for Father to abandon his profession, only to seek “silenced and enslaved” minimum-wage jobs, Father has not stopped working full-time on open-source software, see <https://github.com/quantapix>.

75) Father and Mother-B married on 12/10/2003. Twins were born on 3/13/2004 through IVF and a gestational carrier. Father is the Twins’ biological father.

76) Mother-B is not the Twins' biological mother. Father and Mother-B separated in July 2007, just before Mother-B flew to Hawaii to meet her new online acquaintance. Left alone, Father immediately started to care for the Twins.

77) Father and Mother-B were amicably divorced (with only one uncontested hearing in Family Court) on 3/19/2008. Simultaneously, Family Court awarded the Twins' physical custody and full-time care to Father without opposition.

78) As per Father's child therapist-initiated requests, Mother-B allowed Father to continue calling her with the Twins only to maintain her daily contact with the troubled and confused children. In return, an always "financially deprived" but suddenly multi-millionaire Mother-B wanted to forgo spending any of her never-shared money on the Twins' ongoing support, daily care, and expenses.

79) Father accepted her condition in order to help the Twins' balanced emotional development and overall mental health. Family Court also endorsed Mother-B's argument that Father had "enough money" for his Twins, and she was allowed to not contribute financially at all between July 2007 and April 2011.

80) Furthermore, Mother-B's signed financial statement filed with Family Court on 3/19/2008 listed her total assets at \$6,815,717 with the note: "She expects to receive [an additional] lump sum payment from Mr. Kifor of \$1M [as the last part of Father's \$1.5M buyout of their family residence purchased in 2004 for \$3M with their equally divided but separate cash] when this case is resolved."

81) Father and Mother-C met in December 2007. They got engaged on 3/6/2009, signed a marriage certificate in May 2010, and Siblings were born on 7/1/2009 and 6/4/2011, respectively. With the ongoing litigations, the two never married.

82) Mother-B, without a college degree, and Mother-C, with a college degree, did not get along. Mother-B threatened Father and Mother-C with calling the police and the Department of Children and Families (DCF) on them 16 times before her ultimatum in her 39-minute phone call to Father on 03/29/2011: "*Attorney Foley will suck Cyndi dry, and I will not pay a penny supporting that whore.*"

83) Mother-B called the police on Father on 4/28/2011 with maliciously fabricated child abuse allegations, timed just before Mother-C's planned court action for child support. The police did not arrest Father. Moreover, the subsequently induced repeated DCF investigation screened Father out for physical abuse.

84) Just before that, Mother-C emailed Mother-B (and others) on 4/26/2011:

"You've been a money hungry whore with borderline personality disorder since the day I met Imre. In fact, all he had to do to get you to change your mind about taking the kids was to buy you lunch a week after filing for divorce. Best yet, he ONLY married you because the kids were due in 3 months, and you refused to be the mother if not married!!

And when me and the kids and the nanny had to witness all your screaming fits at drop offs and picks ups, you 'confirmed' everything he was saying. How do you think Imre achieves the 'hero' status he

acclaims he is entitled to? He ‘saved’ his kids from turning into another Ryan, saved his kids from their fit throwing mother that broadcasts not wanting them (and fuck off, you *DID* say that, we all heard you.”

85) On 8/31/2011, the GAL investigation by Drs. Deutsch and Olezeski concluded that: “[Mother-B] either lacks affect or was bullied to abandon her twins.”

86) Family Court did not endorse the “suddenly millionaire Mother-B is incapable of loving her non-biological children” and refused to return Twins to Father.

Feminist “Women Never Lie” Equity

87) On the first trial day, on 8/3/2012, Mother-B testified in Family Court:

- “Q. Now, at the time that you were divorced from Mr. Kifor, do you recall what your net worth was?
- A. I think my net worth at that time was about 2.7 million.”

88) That is significantly less than the \$6,815,717 declared on Mother-B’s signed financial statement filed in Family Court just four years before, on 3/19/2008.

89) Mother-B’s financial statement listed \$2,564,421 in total assets on 6/6/2011.

90) Family Court silently allowed the **significant discrepancy of \$4,251,296** to persist in Mother-B’s voluntarily declared net worth in just over 3 years while unconditionally accepting false claims and refutable misrepresentations from the attorneys, or “trusted officers,” during hearings and trials: “[Atty:] I believe even the GAL will reference that by the time they got married, their relationship was so tumultuous they could barely speak to each other, Your Honor.”

91) Family Court still did not endorse the false “was bullied to abandon her twins” finding by the GAL either, and continued to deny Mother-B’s requests for child support/expenses until 6/30/2014. Nevertheless, Family Court allowed Mother-B’s fraudulently provoked police activity (and the falsely induced DCF report) to propagate to the Mother-C matter on 8/24/2011, resulting in an immediate (and unjustified) order for supervised visitation for even a newborn Sibling.

92) Moreover, Family Court also denied Mother-C’s fabrications on 4/4/2012:

“Father’s motion has been filed in extreme poor taste. While he has championed Dr. Somers’s November 2011 GAL report to multiple third parties and has reviled Dr. Deutsch’s GAL report filed in August 2011, the fact remains that Dr. Deutsch’s report relays information from the only qualified individual to have weighed in on the complex family dynamic between Father, [Mother-C], [Mother-B] and Father’s four children, two of whom are the subject of these paternity actions.”

93) With it, the attorney’s factually false representations were simply ignored:

“Dr. Deutsch considered extensive mental health testing, Father’s controlling nature, and input on Father from other mental health professionals. Dr. Somers considered none of this. Dr. Deutsch interviewed [Twins], yet Dr. Somers refused to speak with them even though they are the only children who can comment on [his] parenting.”

94) Despite direct requests during the trial to investigate Father's under "extreme legal duress" claims (including the bullied Dr. Somers' falsified testimony of not having access to Father's 3 Harvard professor therapists while obstructing their comprehensive psychiatric evaluations of Father), Family Court extended the maliciously fabricated "high conflict" to also the judgment on 2/13/2014.

95) The exhaustive parallel psychiatric evaluations of Father (investigating both the Mother-B and the Mother-C cases) by Dr. Harold Bursztajn, MD, also fully endorsed by both Dr. Alexandra Harrison, MD, and Dr. Mark Goldblatt, MD, conclusively found and stated that: "**(1) Imre Kifor presents no danger to his children; (2) there is no indication of impairment of his fitness to parent.**"

96) Just as requested, Father duly filed his "Offer of Proof" on 11/25/2013, stating:

- "[Mother-B's] in limine motion alleges that 'Father is attempting to use his therapeutic treatment as both a shield and a sword by asserting privilege by his recent assertion of this claim in this action.' This cannot be further from the truth, as evidenced by Father's timely emails.
- As the two mothers are using an allegedly faulty, biased, and incomplete GAL investigation by Dr. Deutsch to forcefully isolate Father from his children while also seemingly forcefully medicating a child into submission, Father has no choice but to relinquish both his attorney/client and therapist/patient privileges in order to somehow protect all of his [dear] children."

97) Father's court-requested offer was filed to support his 11/16/2013 pleading:

“WHEREFORE, [Father] respectfully requests that this Court allow [Father’s three Harvard Medical School professor] therapists to openly testify about their professional views and opinions in this critical matter.”

Materialized Intent To Conspire

98) Despite Father never receiving the 12/5/2013 denial (a fact and reality to this day), material proof of Family Court not sending it came only on 8/9/2021 when the Attorney General’s Office (“AGO”) submitted the Family Court’s falsified docket entries to Father’s then active civil rights violations matter in the Middlesex Superior Court. In the AGO’s submission, the Family Court’s 12/5/2013 denial is first mentioned seven months later as “[On] 7/15/2014 Order on mod dated 12/5/2013 #141” in the attached docket entries, thus rendering the crucial (and constitutional) evidentiary restrictions unappealable.

99) A direct consequence, and realized harm and injury, of the Family Court’s unappealable 12/5/2013 secret denial was the temporary order (mailed on 2/3/2014 and properly delivered) stripping Father’s legal custody of the Twins.

100) Additionally, the seemingly “quick fire” parallel 2/13/2014 judgment (also mailed and delivered) in Mother-C’s matter would have promptly invalidated any interlocutory appeal of the biased 2/3/2014 order in Mother-B’s matter.

101) Moreover, a later appeal of the 2/13/2014 final judgment, based on Mother-B’s then-still-undecided case, would have been premature. Additionally, when the 6/30/2014 judgment finally arrived, the window for appeal for all prior rulings

had closed. As any appeal ignoring the parallel case would have immediately failed (due to the inability to prove the “conspiracy”), Father could not act.

102) Most importantly, any premature appeal referencing the 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 as insinuated by SJC-13427 on 8/8/2023, i.e., “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.”

103) 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.

104) Specifically, through the now 80+ hearings, Family Court never alluded to even the possibility of making any mistakes, inadvertences, or “excusable neglect” in any decision, despite the parallel matters “metastasizing” all over the state District Courts (3 cases), the Middlesex Superior Court (2 cases), the Appeals Court and the SJC (36 dockets), U.S. District Court (6 dockets), U.S. Court of Appeals, First Circuit (2 dockets), and now the U.S. Supreme Court.

105) Therefore, Father asserts that 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.

106) 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 genuinely usurious debt from endlessly accumulating.

107) 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."

Motive, Means, And Opportunity

108) The State seeks to maximize² federal reimbursements. Between 2012 and 2022, a total of \$33M+\$35M+\$35M+\$37M+\$34M+\$29M+\$28M+\$30M+\$34M+\$38M+\$38M = \$371M in child support reimbursements were reported.

109) Competing against all the other states, the State can accomplish this only by 1) targeting families with more resources, 2) individually maximizing each child 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 Family Court's docket records, and 5) concealing any wrongdoing with protecting schemes from all appellate reviews, discovery, and any subsequent federal penalty-inducing corrections.

² See <https://malegislature.gov/Budget/FY2022/FinalBudget> at 1201-0160.

110) The motive and means for the above acts (and the conspiracy to conceal them by purposely silencing and enslaving Father) are substantiated in the attached renewed Civil RICO Class Action Complaint now duly docketed on 11/8/2023.

111) The opportunity for Family Court to deliberately defraud our “rule of law” (for maximized federal reimbursements) is provided by the bitterly jealous yet still colluding but emotionally vulnerable (and hence “victimized”) Mothers.

112) Father’s business and property are contextualized and encapsulated by his software startup, Quantapix, Inc. The June 2011 inception of the one-person company coincides with the start of the lawsuits in Family Court. Father’s injuries to his business and property are tracked by his meticulous corporate records (e-filed in court) showing direct causations other than “market factors.”

113) Father’s continued unconditional compliance with all orders of the Family Court (confirmed by Family Court on 6/3/2022 and 8/16/2023) has univocally demonstrated that Father’s total inability to pay was due to **proven absolute unemployability** induced by the alleged conspiracy to silence and enslave.

114) Nevertheless, Family Court issued specific orders to tighten control over Father’s employment and existence when initiating the alleged conspiracy to silence and enslave. As Family Court was only concerned with Father’s “non-custodial parent” services (for federal reimbursements), his actual engineering expertise, training, skills, and 30+ years of the profession became irrelevant, and he was directly ordered to seek even unskilled or “minimum wage” jobs.

115) Specifically, in the context of the substantiated Civil RICO claims, 1) Father is free from Family Court's control to collect salary (from Quantapix) as long as a) he is paying the ordered child supports, and b) he is silent about needing any appellate reviews, 2) software development has nothing to do with serving as a "non-custodial parent" for federal reimbursements in the Family Court's official business, and 3) Father continues to perform in a thus "professional capacity" for Family Court as a targeted "white male having four children."

Retaliatory Control Of Employment

116) Therefore, Family Court claimed that Father was "not an employee," yet it continues to control all aspects of his employment with a retaliatory agenda.

117) While Father has had a de facto full-time position in his own company (that had been reliably paying payroll and all ordered insurances for years), Family Court deliberately and specifically denied Father the option to continue with his 30+ year "tradition" in the 12/13/2021 "seek work" orders. Accordingly, Father also asserted to the SJC that the autocratic and purely retaliatory "seek work" orders had rendered the Family Court into Father's **"joint employer."**

118) Specifically, the racketeering Family Court has become Father's "employer" as a relationship exists between him and Family Court, where Father is merely "performing a service" (of him being a fabricated "non-custodial parent" fully separated from his children for maximized support amounts) and from which Family Court derives a material economic benefit in federal reimbursements.

REASONS FOR GRANTING THE WRIT

119) Marxist indoctrination builds on a governmental convenience called “equity.”

120) The original concept is repurposed currently as: ”A common misconception exists that equity and equality refer to the same thing. *Equity* is the proportional representation (by race, gender, class, etc.) with all opportunities. *Equality* is ensuring everyone is treated the same and giving everyone access to the same opportunities, rights, and resources in whatever endeavor is being pursued.”³

121) Just recently, this Court eloquently characterized the “controversy” of equity: “Today’s 17-year-olds, after all, did not live through the Jim Crow era, enact or enforce segregation laws, or take any action to oppress or enslave the victims of the past. Whatever their skin color, today’s youth simply are not responsible for instituting the segregation of the 20th century, and they do not shoulder the moral debts of their ancestors. Our Nation should not punish today’s youth for the sins of the past.” Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll., No. 20-1199, 93 (U.S. Jun. 29, 2023).

122) It is no coincidence that this Court decided to start to address this Marxist (and Communist) intractable controversy. Even The White House prioritized the matter on 2/16/2023 in the above-introduced Presidential Executive Order:

³ See <https://www.nsta.org/science-teacher/science-teacher-julyaugust-2020/equity-all>

“By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows: ...

Sec. 8. Affirmatively Advancing Civil Rights ... to prevent and address discrimination and advance **equity for all** ... Agencies shall consider opportunities to: ... (f) prevent and remedy discrimination, including by protecting the public from algorithmic discrimination,” see Appendix B.

123) This case is a well-preserved generalization of the controversy. It showcases the now factual consequences of any Marxist equity and its radical effects on our rule of law. A preview of the herein arguments is presented in Father’s 10/13/2023 open letter/affidavit to President Biden titled “A Marxist (and Communist) ‘Equity-Based’ Justice Directly And Fundamentally Subverts Our U.S. Constitution - A Meticulous Legal Proof“ and is attached in Appendix F.

124) “Equity for all” is impossible by Marxist design as the objective of the social construct is the destructive redistribution of already existing wealth and not the construction of any new wealth. In the context of the Executive Order, Father’s legal matters highlight the intractable problems inherent in Marxist “equity-based” justice: the need to prioritize all the arbitrary agenda-driven “equities.”

125) The children’s 12/12/2023 “name change” hearing in Family Court provided the final proof and is previewed in the 12/13/2023 open letter/affidavit titled “Predatory Feminism Meticulously Ends In ‘Equity For The Rich Vs. Equity For The Poor Mother (And Her Children)’ Dilemma” attached in Appendix F.

Equity-Based Justice Violates One's Ultimate Equity

126) SJC-13427 notes and documents “Governor, Attorney General, Commissioner of Revenue, Middlesex ... Probate and Family Court ..., Barbara A. Duchesne, and Cynthia S. Oulton. None of the appellees has appeared in this appeal.”

127) The SJC’s footnote renders Father’s claim that “he has now lost everything and survives under an implied and forced house arrest” an uncontested fact.

128) Therefore, Father is a proper representative of all Americans where the activist-fabricated distinction between equity and equality collapses and the two become identical. As a “non-gender-fluid” white male, Father is expressly excluded from all statutory antidiscrimination or LGBTQ+ “protected classes.”

129) Consequentially, Father’s sole residual equity extends only to his personal experiences. Every American citizen inherently has this “ultimate” equity.

130) Nevertheless, the deliberately degenerated Father is still equally protected by the Constitution. Father’s civil rights for free speech, due process, and equal protection are nominally intact. Moreover, this Court affirmed on 6/29/2023, as “[our] Nation should not punish today’s youth for the sins of the past,” that protecting one’s ultimate equity is identical to safeguarding one’s constitutional civil rights. However, **23-1008 deliberately allowed SJC to violate both.**

131) While thoroughly invalidating Father’s extensive and unambiguously stated personal experiences, i.e., his ultimate equity, by using a purposely deceptive conclusion for a Supreme Judicial Court, SJC-13427 blatantly reframes Father:

“Among Kifor’s claims is the contention that he was precluded from seeking review of those orders because one or more of them was not timely entered on the Probate and Family Court’s docket.”

132) However, the uncontested fact (that Family Court did not communicate in any way the 12/5/2013 denial to Father) remains. Father could not appeal a decision that he could have no knowledge of as its direct consequence. Additionally, the 12/5/2013 denial was not entered on the docket until 7/15/2014. This means that Father unequivocally could not have received the “nonexistent” 12/5/2013 ruling (itself a material fact) in a timely manner or at all (the factual reality).

133) 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).

134) As the informed Family Court still has not claimed any admissions of neglect or “clerical errors,” the deliberately repeated unlawful Civil RICO predicate acts (e.g., obstruction and mail/wire fraud) of Family Court omitting to inform

of crucial decisions substantiate the assertions that Family Court intentionally precluded the attempts to appeal the fraudulent and discriminatory decisions.

135) Therefore, SJC-13427 simultaneously violates Father's ultimate equity and constitutional civil rights when deliberately reframing, with blatantly flawed deductive logic, Father's unambiguously communicated personal experiences.

136) Consequently, Father claims and asserts that the thus meticulously informed 23-1008 deliberately allowed SJC to continue to conceal and obstruct the now substantiated conspiracy to silence and enslave the whistleblower Father.

Equity-Based Justice Obstructs Rule 60 Fraud On The Court

137) SJC-13427 postulates: "It is incumbent on a petitioner for extraordinary relief to 'to create a record -- not merely to allege but to demonstrate, i.e., to provide copies of the lower court docket entries and any relevant pleadings, motions, orders . . . or other parts of the lower court record necessary to substantiate [his] allegations' that [extraordinary] relief is warranted, *Gorod v. Tabachnick*."

138) Father has diligently created just that with his "Motions For Relief From Orders (Pursuant To Rule 60 Fraud And Specifically Fraud On The Court)."

139) 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) [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 4/21/2022 [see the table of contents in Appendix C]."

140) 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.

141) 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 & trials).

142) Mass. R.Civ.P. 60(b)(6) is interpreted as: "A 'fraud on the court' occurs where it can be demonstrated, clearly and convincingly, that a party has sentiently set in motion some unconscionable scheme calculated to interfere with the judicial system's ability impartially to adjudicate a matter by improperly influencing the trier or unfairly hampering the presentation of the opposing party's claim or defense," Aoude v. Mobil Oil Corp., 892 F.2d 1115, 1118 (1st Cir. 1989).

143) "Fraud on the court occurs where a party tampers with the fair administration of justice by deceiving 'the institutions set up to protect and safeguard the public' or otherwise abusing or undermining the integrity of the judicial process, *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238, 246 (1944). The United States Court of Appeals for the First Circuit skillfully

defined the concept of fraud on the court in *Aoude, supra* at 1118, ” Rockdale Management Co. v. Shawmut Bank, N.A., 418 Mass. 596, 598 (Mass. 1994).

144) Father claims that the informed 23-1008 deliberately allowed SJC to obstruct (or conspire with) an exactly such Rule 60 Fraud On The Court when finding:

“In this case, Kifor failed to carry his burden of demonstrating that adequate alternative remedies were not available to him.”

145) Father’s claim follows from SJC-13427 asserting that: “The record presented in this case is insufficient to warrant extraordinary relief in the nature of certiorari, providing an additional basis on which to deny the petition,” while also simultaneously misrepresenting that “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.”

Equity-Based Justice Applies “Double Protecting” Deception

146) A defining feature of Marxism is that the State is tasked to “specially protect from others,” selectively, instead of “equally protect rights,” but universally.

147) The explicit focus on any such “accepted” groups led to a Russell's Paradox-like⁴ phenomenon: Do those excluded from all enumerated “specially protect from others” groups have any remaining rights worth protecting? To bypass the paradox with its “we can infer anything from a contradiction” consequence,

⁴ See at <https://plato.stanford.edu/entries/russell-paradox/>.

any Marxist equity-based justice had to (re)introduce the “Gulag Archipelago” to effectively deal with the unprotected masses having no “equity” left at all.

148) Despite recent “progressive” concept-laundering attempts, all novel “specially protect from others” groupings continue to be ambiguous and *ad-hoc* artifacts based on conveniently “fluid” political identities. 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 Matters⁵ (at 1:19:11 to 1:21:10).

149) The Russel Paradox only applies to “naive sets,” which are these enumerated groupings exactly. This means that all those Americans who are purposely excluded from the “alphabet soup” of groups (due to their lack of “fluidity” or having no equity at all) cannot possibly be “specially protected from others.”

150) As the direct opposite of “specially protect from others,” our Constitution is the quintessential anti-communist manifesto in that it “equally protects rights,” universally, for all individuals, and not just an “LGBTQ+” alphabet soup of self-conflicting and ever-changing “specially protect from others” groupings.

⁵ See at <https://www.youtube.com/watch?v=37C9hofR6gg>.

151) Regardless of the still raging “men can get pregnant” federal debate, the State has declared its independence already by “**double protecting rights during a time of federal constitutional upheaval**” (see the SJC article in Appendix B).

152) Loudly “double-protecting” a numerically negligible enumerated minority is cost-effective in the context of legislated “maximized federal reimbursements.” Otherwise, any double protection is legally wasteful. Most importantly, legal protection for “men who cannot get pregnant” would lower the mandated and already “maximized” federal support reimbursements that the State can extort.

153) Father belongs and represents the “men who cannot ever get pregnant, are forcefully separated from their children, and are stripped of any constitutional rights,” a stereotypically fabricated “guilty until proven innocent” grouping.

154) For the last 10+ years, Family Court deliberately engaged in the “special protection of the two dishonest Mothers from Father” by systemically denying his constitutional rights for free speech, due process, and equal protection and continually sabotaging his rights to appeal. Family Court resorted to sustained Rule 60 Fraud On The Court, intentionally deceiving other state and federal courts. It then issued secretive “gatekeeper orders” only to double protect the obscenely lucrative and purpose-fabricated “feminist equity” by all means.

155) Conspiring against our Constitution, specifically against the “equal protection of the laws,” 23-1008 allowed SJC to formalize & manifestly endorse the acts.

156) Moreover, while massively invalidating Father's experiences and conspiring to violate his constitutional civil rights, 23-1008 allowed SJC also to threaten Father to stay silent about his meticulously collected and compiled filed record:

"This is the fifth time that Kifor has sought some form of extraordinary relief arising from protracted litigation between him and the mothers of his children. He has been warned repeatedly that 'further baseless attempts to obtain extraordinary relief could result in sanctions.'"

157) Specifically, while Family Court has a duty and legal obligation to disclose its decisions (so that review is possible), on 10/8/2023, yet another "issued order" was kept back, per the statutory definition of 18 U.S.C. § 1341 Mail Fraud.

158) According to SJC-13427, "Nothing in Kifor's petition required extraordinary relief, and the single justice was warranted in denying it." Therefore, Father is denied any further "adequate alternative remedies" to learn about the order.

Equity-Based Justice Leads To "Rich v. Poor Mother" Dilemma

159) In the "Affirmatively Advancing Civil Rights" section, President Biden's 2/16/2023 Executive Order, see Appendix B, also instructs to "advance equity for all." Had the intent been to include all Americans entirely, our Constitution would have sufficed as it equally and effectively protects our ultimate equities.

160) Father is a concrete representative of a thus necessary "left-over group" (after the "specially protect from others" equity-based mandates have been applied).

161) However, Father has no equity left, as 23-1008 allowed SJC to invalidate and forcefully steal even Father's personal experiences (his thus "ultimate" equity).

162) The Executive Order still deceptively claims "advance equity for all," which is paradoxical for Father's never enumerated, i.e., entirely complementary, left-over grouping as by definition that group is the "rest," i.e., all the purposely excluded Americans for whom no "specially protect from others" ever applies.

163) Why is it ambiguous? "Fluidity" is, by its nature, the definition of ambiguity. One day, an American can be in one equity group, and the next day, in another. Can Father suddenly become a "specially protected from others" individual?

164) All anti-discriminatory statutes apply to Father on his "national origin" basis, as he arrived in the U.S. only in 1986. With secretive "gatekeeper orders" (that provenly cannot be appealed), Father is barred from even making a complaint in state courts regarding that alternate "national origin (and culture)" equity.

165) In other words, does a purpose-manufactured "feminist equity" (i.e., "women never lie") trump an individual's "personal experiences" ultimate equity, as per this Court's assertion that "individuals are not the sum of their skin color"?

166) SJC-13427 endorsed that in the "LGBTQ+" (but in actuality only driven to "maximize federal reimbursements" using children) Massachusetts, our civil rights and explicit antidiscrimination statutes always come secondary to any inherently contradictory and incoherent (but lucrative) "feminist equities."

167) To solve Russell's Paradox (carelessly introduced by the enumeration of the purposely non-inclusive LGBTQ+ alphabet soup of "specially protect from others" groups without ever mentioning the also always inherently present "leftovers"), the deliberately deceitful "equity for all" must be corrected to a mere "equity for some," in an apparent contradiction with our Constitution.

168) Until then, the federal agencies must consider the inherent consequences of any "progressive" equity-based (but merely zero-sum, to redistribute wealth by force) justice, especially since the naive Marxist enumeration of "protected classes" leads to the implied creation of the "leftover" Americans that cannot ever be "specially protected from others" and are thus silenced and enslaved.

169) By continuing to allow mail fraud, falsified dockets, statutory discriminations, etc., to occur, 23-1008 has encouraged SJC to effortlessly cleanse from "toxic masculinity" as Father cannot ever belong to any "LGBTQ+" protected classes.

170) Moreover, even once Father is eliminated from consideration, the controversy will still result in the dilemma: **equity for the "rich" or the "poor" mother?**

171) Due to agenda-driven forced parental alienation, the retaliating Family Court has spared no effort to separate the children from their Father. Since 4/28/2011, he has had only supervised contact with his children. The countless monitors were openly activist professionals subsidized by the State, yet no monitor ever complained about Father's conduct. Consequently, Father cannot think of any reasonable justifications for his dear children to express negativity toward him.

172) The “name change” hearing in Family Court on 12/12/2023 resulted in the testimony that the children feel “fatherless.” As “extreme parental alienation should be considered emotional child abuse and referred criminally,” the dear children’s feelings can only be attributed to the Family Court’s activist agenda.

173) Contradicting the SJC’s “double protecting” objective in support of a Marxist (and naive) equity-based justice, the Family Court’s now manifested agenda to advance the millionaire mother’s feminist equity (i.e., “women never lie”) is paid for exclusively by the “poor” mother and her “fatherless” minor children.

CONCLUSION

174) Father asserts that the thus deliberately induced judicial deadlock is a bona fide “war of attrition” strategy for delaying any investigations and denying Father’s desperate requests for relief from the thus retaliatory forced indigency.

Dogmatic Interplay Between Courts Is Statutory Discrimination

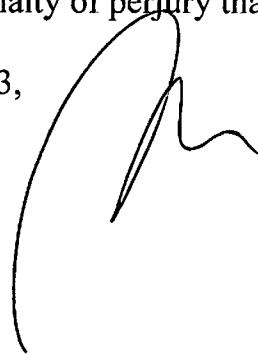
175) Moreover, as substantiated in Father’s attached renewed Civil RICO Class Action Complaint, the war on Father, allowed by 23-1008, meets all the criteria for **statutory discrimination** and conspiracy to violate federal law on purpose.

176) Significantly, these cases are meticulously preserved generalizations of this Court’s 6/29/2023 decision regarding institutional (and governmental) efforts to infuse an ambiguous & inconsistent “social justice revolution” into our society, specifically to redistribute the vast wealth accumulated in our federal treasury.

Therefore, the herein petition for a writ of certiorari should be granted.

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

December 24, 2023,

A handwritten signature in black ink, appearing to read "Imre Kifor".

Respectfully submitted,
/s/ Imre Kifor
Imre Kifor, Pro Se
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I have no phone
I have no valid driver's license
I have to move to a homeless shelter
<https://femfas.net>