

24-7282
No. _____

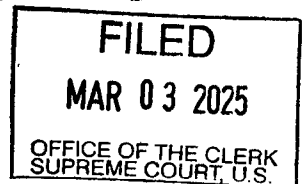
IN THE
SUPREME COURT OF THE UNITED STATES

IMRE KIFOR,
Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS et al.,
Respondents.

ORIGINAL



On Petition For A Writ Of Certiorari To
The United States Court Of Appeals For The First Circuit No. 24-1075

IMRE KIFOR'S PETITION FOR WRIT OF CERTIORARI

March 1, 2025,
May 5, 2025,

Imre Kifor
32 Hickory Cliff Rd.
(mailbox only, house torn down)
Newton, MA 02464
ikifor@gmail.com
617-881-9046
(via federal Lifeline program)
I have no valid driver's license
I now sleep in a homeless shelter
<https://www.youtube.com/@ImreKifor>

QUESTIONS PRESENTED

- 1) The Commonwealth of Massachusetts aims to “double protect”¹ some citizens at the expense of revoking all protections from others, including Constitutional rights. Does “double protecting” some waive Constitutional protections for all?

- 2) Do any immunities apply to an “LGBTQ+” Massachusetts when using federal “reimbursements” to subsidize forceful separation and agenda-driven extreme alienation² of innocent American children from their loving American parents?

¹ See “State Constitutional Law Declares Its Independence: Double Protecting Rights During a Time of Federal Constitutional Upheaval” by Scott L. Kafker, Associate Justice of the Massachusetts Supreme Judicial Court, as published at https://repository.uclawsf.edu/hastings_constitutional_law_quaterly/vol49/iss2/4/.

² See https://www.ncsc.org/_data/assets/pdf_file/0014/42152/parental_alienation_Lewis.pdf.

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) Governor Maura Healey (in official capacity),
- 3) Attorney General Andrea Campbell (in official capacity),
- 4) Commissioner Geoffrey Snyder (in official capacity, Department of Revenue,
Child Support Enforcement Division),
- 5) Middlesex Division of the Probate and Family Court Department,
- 6) Yale School of Medicine (Yale University),
- 7) The Counseling Center of New England (now Lifestance Health, Inc.),
- 8) Atrius Health,
- 9) Barbara A. Duchesne, and
- 10) Cynthia S. Oulton.

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. Petition denied
1/8/2024.
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.
Complaints denied 12/11/2023.
31. Kifor v. Massachusetts, et al., 23-6398, U.S. Supreme Court. Petition denied
2/26/2024.

32. Kifor v. Commonwealth et al., 24-1075, U.S. Court of Appeals, First Circuit.
Order entered 1/23/2025.
33. Kifor v. Duchesne/Oulton, 2024-J-0152 and 2024-J-0153, Mass. Single Justice
Appeals Court. Petitions denied 3/25 and 3/27/2024.
34. Kifor v. Commonwealth et al., SJ-2023-M014, Mass. Supreme Judicial Court.
Order entered 2/29/2024.
35. Kifor v. Commonwealth et al., 2481CV00983, Mass. Middlesex Superior
Court. Ongoing.
36. Kifor v. Commonwealth et al., SJ-2024-M008/10, Mass. Supreme Judicial
Court. Order entered 5/31/2024.
37. Kifor v. Commonwealth et al., SJ-2024-M026, Mass. Supreme Judicial Court.
Order entered 9/26/2024.
38. Kifor v. Duchesne/Oulton, 2025-J-0110 and 2025-J-0111, Mass. Single Justice
Appeals Court. Petitions denied 2/18/2025.
39. Kifor v. Duchesne/Oulton, 2025-J-0038 and 2025-J-0039, Mass. Single Justice
Appeals Court. Petitions denied 1/23/2025.
40. Kifor v. Commonwealth et al., SJ-2025-M006, Mass. Supreme Judicial Court.
Submitted 2/10/2025.

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- 1) Adoption of Zoltan, 71 Mass. App. Ct. 185 (Mass.2008),
- 2) Bain v. City of Springfield, 424 Mass. 758, 763 (Mass. 1997),
- 3) Barrett Assoc., Inc. v. Aronson, 346 Mass. 150 (Mass. 1963),
- 4) Bercume v. Bercume, 428 Mass. 635 (Mass. 1999),
- 5) Blanchette v. School Committee of Westwood, 427 Mass. 176, 184 (Mass. 1998),
- 6) Boston Edison Co. v. Board of Selectmen of Concord, 355 Mass. 79, 83 (Mass. 1968),
- 7) Briggs v. Carol Cars, Inc., 407 Mass. 391 (Mass. 1990),
- 8) Brown v. Gerstein, 17 Mass. App. Ct. 558 (Mass. App. Ct. 1984),
- 9) Canavan's Case, 432 Mass. 304, 308 (Mass. 2000),
- 10) Carey v. Piphus, 435 U.S. 247 (1978),
- 11) Carter v. Housing Authority, 450 Mass. 626 (Mass. 2008),
- 12) Cashman Equip. Corp. v. Penny, 19-P-1814 (Mass. App. Ct., 2021),
- 13) Comey v. Hill, 387 Mass. 11, 19 (Mass. 1982),
- 14) Commonwealth v. Alphas, 430 Mass. 8 (Mass. 1999),
- 15) Commonwealth v. Fredette, 56 Mass. App. Ct. 253, 260 n.10 (Mass. App.Ct. 2002),

³ The relevant text of the cited cases and statutes appears in Appendix D. *Passim* is implied throughout.

- 16) Commonwealth v. Hatch, 438 Mass. 618, 623 (Mass. 2003),
- 17) Commonwealth v. Knight, 392 Mass. 192, 193-94 (Mass. 1984),
- 18) Commonwealth v. Souza, 492 Mass. 615, 626 (Mass. 2023),
- 19) Dawson v. Equity Investment Group, No. No. 2001517 (Mass. Cmmw. Aug. 11, 2006),
- 20) Edwards v. Aetna Life Ins. Co., 690 F.2d 595, 599 (6th Cir. 1982),
- 21) East Cambridge Savings Bank v. Wheeler, 422 Mass. 621, 623 (Mass. 1996),
- 22) Fitzpatrick v. Bitzer, 427 U.S. 447 (1976),
- 23) Furtado v. Furtado, 380 Mass. 137 (Mass. 1980),
- 24) Great Northern Ins. Co. v. Read, 322 U.S. 47, 54 (1944),
- 25) Griffin v. Breckenridge, 403 U.S. 88 (1971),
- 26) In re Birchall, 454 Mass. 837, 838-39 (Mass. 2009),
- 27) J.A. Sullivan Corp. v. Commonwealth, 397 Mass. 789, 792, 494 N.E.2d 374 (1986),
- 28) Jackson v. Birmingham Bd., 544 U.S. 167, 168 (2005),
- 29) Johnson v. Commonwealth, 977 N.E.2d 541, 544 (Mass. 2012)
- 30) Judge Rotenberg Educ. v. Comm. of the Dep. of M. R, 424 Mass. 430, 443 (Mass. 1997),
- 31) Kendall v. Selvaggio, 413 Mass. 619 (Mass. 1992),
- 32) Lamoureux v. Supdt. Mass. Correctional Inst. Walpole, 390 Mass. 409 (Mass. 1983),

- 33) *Laramie v. Philip Morris USA Inc.*, 488 Mass. 399, 405, 173 N.E.3d 731, 741 (2021),
- 34) *Lopez v. Commonwealth*, 463 Mass. 696, 703 (Mass. 2012),
- 35) *Lopez v. Mass.*, 588 F.3d 69, 86 (1st Cir. 2009),
- 36) *Martinez v. Newport Beach*, 125 F. 3d 777, 785 (9th Cir. 1997),
- 37) *McHugh v. Commonwealth*, 97 Mass. App. Ct. 1104 (Mass. 2020),
- 38) *Mireles v. Waco*, 502 U.S. 9, 11-12 (1991),
- 39) *Mole v. University of Massachusetts*, 442 Mass. 582, 591-92 (Mass. 2004),
- 40) *O'Brien v. DiGrazia*, 544 F.2d 543, 546 n.3 (1st Cir. 1976),
- 41) *Otis v. Arbella Mutual Insurance Company*, 443 Mass. 634, (Mass. 2005),
- 42) *Parrell v. Keenan*, 389 Mass. 809 (Mass. 1983),
- 43) *Precision Co. v. Automotive Co.*, 324 U.S. 806, (1945),
- 44) *Pelican Production Corp. v. Marino*, 893 F.2d 1143 (10th Cir. 1990),
- 45) *Pennhurst State School Hosp. v. Halderman*, 465 U.S. 89, 155 (1984),
- 46) *Pollock v. Williams*, 322 U.S. 4, 18 (1944),
- 47) *Pulliam v. Allen*, 466 U.S. 522, 541-42 (1984),
- 48) *Psy-Ed Corp. v. Klein*, 459 Mass. 697, 707 n.24 (Mass. 2011),
- 49) *RCN-BecoCom, LLC v. Commissioner of Revenue*, 443 Mass. 198, 204 (Mass. 2005),
- 50) *Rockdale Management Co. v. Shawmut Bank, N.A.*, 418 Mass. 596, 598 (Mass. 1994),

- 51) *Sahin v. Sahin*, 435 Mass. 396 (Mass. 2001),
- 52) *Salvesen v. Salvesen*, 370 Mass. 608 (Mass. 1976),
- 53) *Sax v. Sax*, 53 Mass. App. Ct. 765 (Mass. App. Ct. 2002),
- 54) *Stump v. Sparkman*, 435 U.S. 349 (1978),
- 55) *Sullivan v. Chief Justice*, 448 Mass. 15, 24 (Mass. 2006),
- 56) *Trillium, Inc. v. Cheung*, 11-P-727 (Mass. Feb. 21, 2012),
- 57) *U.S. v. Ballek*, 170 F.3d 871 (9th Cir. 1999),
- 58) *U.S. v. Williams*, 121 F.3d 615, 620-21 (11th Cir. 1997),
- 59) *Winthrop Corp. v. Lowenthal*, 29 Mass. App. Ct. 180 (Mass. 1990).

STATUTES AND RULES

- 1) Rules Of The Supreme Court Of The United States (1/1/2023) D:19
- 2) Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, *et seq.* D:19
- 3) Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* D:20
- 4) Age Discrimination in Employment Act of 1967 (29 U.S.C. § 621, *et seq.*)D:20
- 5) Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-6107) D:21
- 6) Deprivation of Civil Rights (42 U.S.C. §§ 1981, 1983, and 1985) D:23
- 7) Racketeer and Corrupt Organizations Act, 18 U.S.C. §§ 1961-1968 D:24
- 8) Attempt and Conspiracy: Mail Fraud, 18 U.S.C. §§ 1341, 1349 D:25
- 9) Unlawful discrimination, Massachusetts G.L.c. 151B D:25
- 10) Massachusetts G.L. c. 211, § 3 D:26

11) Massachusetts G.L. c. 211A, § 10	D:26
12) Massachusetts G.L. c. 215, § 9	D;26
13) Massachusetts G.L. c. 231A	D:27
14) Massachusetts G.L. c. 249, § 4	D:27
15) Indigency Laws, Massachusetts G.L. c. 261, §§ 27A-D	D:28
16) Massachusetts G.L.c. 271A, Enterprise Crime.	D:28

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

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

OPINIONS BELOW

Appendix A contains the unpublished decision of the USCA1 to review the merits of. This decision is inevitably contextualized by the sequence of agenda-driven¹ prior decisions of the Massachusetts Supreme Judicial Court (“SJC”), which have been consolidated and “staged” as docket Nos. SJ-2024-M026 and SJ-2025-M006 and summarized in Appendices B and C. Appendix C also presents the predictable consequence of the USCA1 decision to be filed in the U.S. District Court, District of Massachusetts, (“USDC”) on 5/13/2025, see page 2 (hereby denoted as C:02).

JURISDICTION

The USCA1 decided Father’s appeal on 11/19/2024, denied Father’s petition for a rehearing en banc on 1/23/2025, and issued the mandate on 1/31/2025. Therefore, the jurisdiction of this U.S. Supreme Court is invoked under 28 U.S.C. § 1254(1), and a contextual review of these decisions is sought as they unavoidably lead to the “endlessly renewed complaints for discrimination” already duly manifested, C:117.

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

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 “main” discriminations in a public place based on sex, gender, and national origin, i.e., Massachusetts G.L.c. 272, § 98;
- Subsequent (and also directly targeted) Massachusetts G.L.c. 151B, § 9, “unlawful practices,” i.e., M.G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination;
- “Superintendence of all courts of inferior jurisdiction to correct and prevent errors and abuses therein,” i.e., Massachusetts G.L.c. 211, § 3;
- “Questions of law concerning the Constitution which have been raised in a court of the Commonwealth,” i.e., Massachusetts G.L.c. 211A, § 10;
- Violations of “Enterprise Crime,” i.e., Massachusetts G.L.c. 271A;
- Violations of “entitled to appeal,” i.e., Massachusetts G.L.c. 215, § 9;
- Violations of the Massachusetts Indigency Laws, G.L.c. 261, §§ 27A-D;

STATEMENT OF THE CASE

- 1) Father's now fourth petition for a writ of certiorari is a continuation of his first petition (docketed as 22-7115 on 3/27/2023), second petition (docketed as 23-5932 on 11/1/2023), and third petition (docketed as 23-6398 on 12/26/2023).
- 2) The decision of the USCA1, No. 24-1075, which is requested to be reviewed, is a timely appeal of the *sua sponte* dismissal of Father's second Civil RICO class action complaint. Appendix B summarizes the procedural history of the appeal.
- 3) Relevant substantiating references to Father's SJC dockets are also included as manifestations of an alleged dogmatic interplay between the state and federal courts. Father's petition No. 23-5932 in this Court substantiated that the SJC's decision on 8/8/2023 was the direct cause of action for Father's second (thus renewed) Civil RICO class action complaint docketed in USDC on 11/8/2023.
- 4) Specifically, Father cited the direct statutory discriminations, i.e., "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), deliberate deprivation of civil rights (42 U.S.C. §§ 1981, 1983, and 1985), and systemic & sustained Civil RICO (18 U.S.C. § 1962) prohibited activities," as his causes of actions.

- 5) USDC dismissed the case on 12/21/2023, and Father's subsequent motion to alter or amend the judgment was denied on 1/5/2024. The denial to alter was reiterated on 1/22/2024. Father timely filed a notice of appeal on 1/9/2024.
- 6) Consequently, Father presented the following issues for review to USCA1:
- (1) Father is a *pro se* and *forma pauperis* party but **not a prisoner** as [USDC] noted "[He] claims that he is under 'implicit long-term house arrest' ... his allegation of 'implicit' custodial status at this point is wholly inadequate ... a review of the Petition and exhibits does not reveal that [he is] currently in custody at all," Kifor v. Probate & Family Court et al., No. 20-11601-PBS.
- (2) In the context of the 2/16/2023 Presidential Executive Order ("[Biden's] Executive Order"), Father asserted even to The White House on 1/26/2024:
- "As I have not committed any crimes, have never been convicted, and have never been a prisoner, I immediately objected to [USDC's merely projected] '**prisoner-like**' (but purely group-identity-based) segregation."
- (3) In the context of the 12/21/2023 dismissal, the raised issues for review are:
- A. The "Sec. 8. Affirmatively Advancing Civil Rights ... to ... advance equity for all" clause of the [Biden's] Executive Order 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 only a chosen few) Constitutional?

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

C. Is [USDC] justified to openly and deliberately engage in a “dogmatic interplay” with the agenda-driven statutory discriminations & retaliations by Massachusetts and thus actively advance “prisoner-like” segregations?

7) Father’s second Civil RICO class action complaint, which was thus renewed in USDC, established that the claimed discriminatory (and subsequent retaliatory) acts and conduct were identical to the substantiated RICO-prohibited activities.

8) As Father’s renewed complaint directly referenced that Congress had abrogated the states’ sovereign immunity for all the cited discrimination statutes, his new evidence, therefore, unequivocally contradicted the claims made for USCA1, No. 23-1008, by the Commonwealth of Massachusetts (“State”) on 2/10/2023:

“The [State has] sovereign immunity from [Father’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 [USDC] order affirmed.”

9) Significantly, pursuant to M.G.L.c. 211, § 3, and M.G.L.c. 249, § 4, Father also renewed his petitions to the SJC by “seeking emergency relief from the public nuisance, e.g., discriminatory and retaliatory, and **profoundly child-predatory** deliberate activities of [the State], which are continually not according to the

course of the common law, violate federal law on purpose, and which court proceedings are not reviewable by motion or appeal” on 2/10/2025 (see the SJ-2025-M006 “staging” docket summarized in Appendix C) while stating:

- Specifically, Father hereby substantiates that the State has deliberately subverted the “innocent until proven guilty” core principle of our American rule of law while secretly replacing it with the profiteering (i.e., for federal “reimbursements”) and Stalinist-inspired “guilty until proven innocent -- but with all proofs purposefully discarded and evidence outright erased,” and
- The erroneous court proceedings are ongoing in the Middlesex Probate And Family Court (“Family Court”) and the Superior Court (“Superior Court”).

- 10) In his renewed SJC petition, Father reiterated on 2/10/2025 that, according to the SJC’s order on 8/8/2023, i.e., SJC-13427: “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 [the extraordinary] relief is warranted,” he had duly furnished the SJC with his 5,846-page verifiable “SJC Record” (as SJ-2024-M026) and a 7-volume supplementing Record Appendix.
- 11) Father's meticulously assembled and preserved SJC Record, also diligently and immediately **communicated with USCA1, No. 24-1075**, documents the State’s

endlessly repeated instances of a) disparate treatment, b) followed by Father's prompt oppositions, and then c) concluded with the State's targeted retaliations.

12) The SJC Record also substantiates that proving the thus repeated cycles of the deliberately sustained and systemic disparate treatments was impossible before:

- a) the "NOT GUILTY" reversal on 2/26/2024 regarding the prior invidious "Father has hidden Romanian assets" baseless projections by Family Court,
- b) the quiet revealing on 4/20/2024 of the 12/5/2013 secret, or discriminations and subsequent direct retaliations hiding, "gatekeeper" Family Court order,
- c) the SJC's confirmation on 5/31/2024 of the invidious mail fraud, falsified court dockets, and the repeatedly sabotaged direct appeals by Family Court.

13) These three key events together constitute the now substantiated proof for the herein-stated claims. Consequently, the parallel 1/30/2025 hearings in Family Court provided the direct evidence for the to-be-reported "Clearly Manifested Mechanism And Concise Proof For The Child-Predatory Profiteering Based On Gross 'Governmental Inefficiencies,'" A:10, as also documented by Father to Sen. Warren, Gov. Healey, and Newton Mayor Fuller, C:07, on 1/31/2025, i.e.,

"Yesterday's 'never to be repeated' pause in both threats for arrest [and jail sentence] and discarding of [his] submissions revealed the 'Catch-22 Trap':

- a) 'Father must explicitly spend money to properly file his pleadings [and all his therefore supporting] evidence in the Family Court,' but

b) 'If he spends any money (but doesn't first pay his usuriously accumulated and now [\$445,000+] of in-arrears child supports and court-ordered other expenses, [i.e.,] a federal felony) then he must be arrested and sent to jail (therefore immediately invalidating all his pleadings and evidence).'"

14) As these cycles of unlawful acts have continued to occur for the last 13+ years in an organized and orchestrated fashion, Father has claimed in federal court that a manifested pattern of RICO racketeering had emerged. He had identified the "predicate acts" as mail/wire fraud, obstructions of justice, and retaliations.

15) Starting with his first Civil RICO complaint, Father named the "Enterprise" as the association in fact of the therefore colluding/conspiring Respondents, i.e., "This Enterprise has (1) a shared purpose of investigating, determining, and enforcing child support payments (and then collecting the maximized federal reimbursements); (2) a charter, continuity, and longevity of its structure; and (3) all the members depending on and working in concert/coordination with each other to pursue the shared interest (incentivized by professional fees)."

16) The latest instances of mail fraud were committed by Family Court on 12/16/2024 and 1/6/2025. These pointed to the latest instances of parallel (at least 3 occurrences to substantiate the "systemic pattern" claims) falsified dockets, i.e., a) the **explicit discarding** of Father's crucial "Renewed Motion To Extend The Time For Return Of Service Due To Continued Sabotage By An Officer Of The Court," properly supported and also timely e-filed on 12/9/2024, and

b) the **forced erasing** of Father's required 135-page relevant evidence e-filed on 12/26/2024 as the supporting attachments to his parallel motions titled:

- “[Father’s] Corrected Motion For Relief From Judgments And Orders By Justices Donnelly, Monks, Cafazzo, And Allen Pursuant To Rule 60 Fraud And Fraud On The Court,” and
- “[Father’s] Corrected Motion For Relief From Judgments And Orders By Justices Donnelly, Gibson, Black, And Allen Pursuant To Rule 60 Fraud And Fraud On The Court.”

17) Father’s SJC Record has already substantiated that the continued (racketeering) obstructions of justice and retaliations against him, by “silencing & enslaving” with endlessly disparate treatments and repeated civil rights violations, were deliberately re-committed by the State when deceiving/misrepresenting about the uncontested facts in Superior Court (docket# 2481CV00983) on 7/26/2024:

“[Father’s] claims [of sustained and systemic disparate treatments against him] are barred by absolute judicial or prosecutorial immunity because they arise from: judicial rulings in custody and child support proceedings in the Family Court; the prosecution of those proceedings; or decisions not to pursue alleged civil rights claims arising out of those proceedings.”

18) Substantiated by his SJC Record, Father summarized the two events (i.e., the explicit discarding of his submissions and the forced erasing of his evidence by Family Court) in his emailed statement to the Newton Police on 1/14/2025:

“To reiterate my concise point, while I had known that falsifying the Family Court dockets was possible by openly abusing the federal mail system, I could not prove the individual steps for my federal Civil RICO case.

Switching over to the e-filing system allowed me to monitor the exact ‘handshake protocols.’ And with the parallel 1/2/2025 Family Court orders (included in yesterday’s email), I finally have clear and concise proof for my submissions being discarded and evidence outright erased only to ‘sanitize’ the DOR CSE monitored Family Court dockets, i.e., the ones bringing in the ‘maximized’ (and deeply child-abusive) federal reimbursements,” C:19.

19) In his “Request For ‘Sanctuary Protection And Shelter’ From Substantiated Anti-Immigrant/Anti-Masculine ‘Enterprise Crime’ By Massachusetts” to the Governor and Newton City Mayor, C:07, Father elaborated on 1/31/2025 that:

“As any remedy to my intractable ‘absolute employment discrimination’ (see my now [2,530+] diligently submitted and always fully compliant weekly job applications) is only possible through the proper ‘Motions For Relief From Judgments and Orders,’ the Family Court has been deliberately obstructing exactly that ... This ‘Catch-22 Trap’ (paused, and thus revealed, only once on 1/30/2025) is the manifested mechanism and proof for the claimed child-predatory ‘feminism’/profiteering ‘LGBTQ+’ discrimination schemes that I have meticulously documented in my SJC Record for the

Supreme Judicial Court. The schemes' objective is to abusively drive the anti-masculine 'forced fatherlessness' in our [victimized dear] children."

20) In his 1/26/2025 email to the Respondents, Father also identified the enabling SJC Rule, in addition to the above now-proven "Catch-22 Trap" mechanism:

"It is now obvious that neither the state nor federal courts can be responsible for the Marxist-inspired intentional ambiguity and purposeful inconsistency by the SJC to deliberately subvert the 'innocent until proven guilty' core principle with the 'forcefully double protecting some'² reincarnation of the old Stalinist 'guilty until proven innocent — but with the proofs deliberately discarded and the evidence outright erased.' Specifically, I will argue in my petitions [to the SJC/SCOTUS] that Rule 5 of the [Mass. R.E.F.]³, i.e., 'The clerk may reject any document filed electronically for any technical non-conformance with the Rules of Court' (with absolutely no definition publicly available for any such 'technical non-conformance' for the Family Court) is the Marxist-inspired generalized and reiterated (for e-filings) loophole that directly injects the 'equity-based' (social justice) into all judicial proceedings in Massachusetts. Consequently, the recent deliberate discarding of my pleadings and outright [forced] erasing of my attached evidence was done in contradiction (and a now direct violation) of President Trump's just issued

² See again https://repository.uclawsf.edu/hastings_constitutional_law_quaterly/vol49/iss2/4/.

³ See <https://www.mass.gov/doc/sjc-rule-125-massachusetts-rules-of-electronic-filing/download>.

'Ending Illegal Discrimination And Restoring Merit-Based Opportunity'⁴

[Presidential Action] for my federally reimbursed Family Court cases.”

- 21) Consequently, Father’s requested relief was justified and appropriate as only the SJC has jurisdiction to “correct the errors” regarding the Marxist-inspired ambiguity & inconsistency of Mass. R.E.F. Rule 5 (and the violations thereof).
- 22) With his “Status Affidavit On The Now Manifested Absence Of Adequate And Effective Alternative Remedies” timely e-filed with SJC on 2/20/2025, C:85, Father reiterated that, after the 1/30/2025 “in-person” parallel hearings in the Family Court, i.e., his “once in a lifetime” opportunity to escape the “Catch-22 Trap” due to the unexpected \$1,606.75 refund check from the now defunct but prior “most prestigious law firm in Boston,” the forcedly indigent party (having \$0.71 while also facing absolute employment discrimination) will never be able to properly file any new motions for relief from judgments & orders should the appellate courts deny reviewing his interconnected matters. Specifically, Father will never be able to file new motions for relief **and the required attachments** without the requested reviews and justified revisions to Mass. R.E.F. Rule 5.
- 23) In his affidavit, Father informed the SJC about him being defrauded again in the Family Court, despite his in-court testimony that his shelter would be “torn down in a week or two” (also substantiated in his filed motions for indigency).

⁴ See <https://www.whitehouse.gov/presidential-actions/2025/01/ending-illegal-discrimination-and-restoring-merit-based-opportunity/>.

STATEMENT OF FACTS

- 24) Father has four children from non-overlapping, long-term, and fully committed relationships: 2 older children ("Twins") with his former wife, the Respondent Barbara Duchesne ("Mother-B"), and 2 younger children ("Siblings") with his former fiancée, the Respondent Cynthia Oulton ("Mother-C"). The two bitterly jealous but still colluding Mothers initiated child-support and custody-related lawsuits against Father under maliciously false, fraudulent, and discriminatory pretenses in Family Court in 2011 after lying to the police/DCF on 4/28/2011.
- 25) Specifically, after the (misrepresented) "inaction" by the police and DCF, the Mothers resorted to discrimination against Father based on his national origin.
- 26) 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 investigations screened Father out for physical abuse.
- 27) The Mothers wrestled the Twins' physical custody away from the immigrant Father in Family Court with deliberately triggered disparate treatments against him, as he "might have considered" fleeing the U.S. (with the application of "the right amount of bullying") solely due to the citizen having a U.S. passport.
- 28) However, the Mothers knew at all times that Father (and his family) had been Hungarian "hated minorities" in Romania and were granted political asylum by

the U.S. in 1986. Consequently, they knew that Father and family had legally emigrated from Romania and had no assets, property, money, etc., left behind in the former communist tyranny. The Mothers were also keenly aware that his entire net worth was unequivocally created when he sold his software company.

29) Specifically, Father diligently disclosed his meticulously preserved financials during the discovery phase of his divorce from Mother-B, which he later also summarized in his financial statement filed in the Family Court on 3/19/2008.

30) Moreover, the couple's amicable divorce was administered fairly and lawfully.

31) Father's total net worth at the time was \$6,746,867. On the same day, on 3/19/2008, Mother-B declared a total net worth of \$6,815,717 in her own respective financial statement filed with Family Court. The divorced couple's combined net worth was derived entirely from the 60/40 split of the proceeds from the sale of Father's company and the rewarding of Mother-B's non-technical role.

32) Father is a software engineer with a master's degree in computer science. He has worked all his life for his own software companies. He sold one for \$25M in 2000, with himself as the founder and sole software developer. Despite the 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 his now open-source software, see <https://github.com/quantapix>.

33) After lying to the police/DCF on 4/28/2011, Mother-B filed a new and revised financial statement with the Family Court. Mother-B's net worth dropped from

\$6,815,717 on 3/19/2008 to \$2,564,421 on 6/6/2011, a thus manifestly drastic \$4,251,296 change in just three years. Mother-B staged the blatant **4 million dollar financial fraud** on purpose to support her sudden QAnon-style infantile narrative, an attorney-assisted malicious fabrication, that attempted to recast Mother-B's prior abandonment of her then 3.5 yo non-biological Twins (solely for her selfish "liberty and riches") into "a victimized American mother bullied by a millionaire 'Romanian' immigrant suddenly 'fleeing the country' in fear."

- 34) However, Father and Mother-B married on 12/10/2003. The Twins were born on 3/13/2004 through IVF & gestational carrier. Father is the Twin's biological father and she is **not** their biological mother. The two separated in July 2007, just before Mother-B flew to Hawaii to meet her new online acquaintance. Left alone, Father immediately started caring for the Twins. The amicable divorce (with only one uncontested hearing) was finalized on 3/19/2008 and the Twins' physical custody and full care were awarded to Father without any opposition.
- 35) The GAL investigation by Drs. Deutsch and Olezeski concluded on 8/31/2011, "[Mother-B] either lacks affect or was bullied to abandon her twins." Family Court still did not endorse the "suddenly millionaire Mother-B is incapable of loving her non-biological children" and refused to return the Twins to Father.
- 36) Father and Mother-C met in December 2007. They got engaged on 3/6/2009, signed a marriage certificate in May 2010, and the Siblings were born on 7/1/2009 & 6/4/2011, respectively. With ongoing litigations, the two never married.

- 37) 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."
- 38) Specifically, Mother-B reiterated her objective in her call to Father on 3/29/2011: to preempt Mother-C from getting her (i.e., Mother-B's always private and personal) money through the \$10,000/month child support Mother-C had suddenly started unjustly demanding from Father. To fabricate the thus needed ambiguity and inconsistency, Mother-B committed perjury on purpose during the trial in Family Court on 8/3/2012 when she lied about the 4 million dollar documented discrepancy in her net worth at the time of her divorce in 2008.
- 39) Mother-C later used Mother-B's misrepresentations to further her retaliations against Father with false allegations of "male financial control," "abuse," and even malicious and **categorically false rape deceptions**. Specifically, Mother-C continued to also knowingly misrepresent Mother-B's deliberately staged 4 million dollar fraud when falsely claiming in her filings even on 7/25/2018 that "evidence does not support that there has been fraud on the Court by anyone other than Father himself and, as the inflictor of damages, [he] does not deserve ... compensation." Openly falsifying Father's financials had caused difficulties for Mother-C as early as 11/4/2013 when she attempted to assign the 4 million

dollars “hiding in plain sight” (in Mother-B’s accounts) to Father’s “prior net worth” and misrepresent that “[Father] has somehow managed to spend close to a million dollars per year.” For that **attorney-assisted** blatant fabrication and deliberate misrepresentation (allowed to continue/fester with absolute impunity in Family Court to this day), Mother-C demanded \$163,399.76 in “legal fees.”

40) Driven by deliberate discriminations (including all the subsequent retaliations), institutionalized child abuse (knowingly perpetrated by the Family Court with a purpose to conceal), and Rule 60 fraud on the court, intractable indigency was thus forced on Father, with his circumstances not changing since 2/12/2018.

41) Father was first ordered to pay any child support in June 2011, more than 13 years ago. Between then and 2/12/2018, when Father first approached Family Court to seek justified modifications and relief, he never missed nor was ever late with his ordered support obligations for his four children. Currently, the State receives the “maximized reimbursements” according to the federal Child Support Enforcement⁵ (“CSE”) program through the Massachusetts DOR CSE.

42) Pursuant to the CSE rules, the forcibly indigent Father immediately sought modifications in his parallel child support (and expenses) orders. However, Family Court continued to deliberately violate his constitutional rights by not allowing his ~\$5,000/month combined parallel support orders to be modified, despite his diligently e-filed complete financial record dating back to 2008.

⁵ See <https://crsreports.congress.gov/product/pdf/RS/RS22380>.

43) Consequently, Father's combined in-arrears court-ordered obligations for his children have reached **\$445,000+**. While he has consistently complained in the Family Court about the allowed stereotypical discriminations and the agenda-driven retaliatory "reprogramming," the Family Court retaliated immediately against Father by completely degrading his fatherly bonds. The ruthless orders aimed to sustain the now manifested **forced fatherlessness** of his four children.

44) As substantiated motivations behind these targeted retaliations by (effectively) the State, Father has consistently argued in both federal and state courts that:

"The State publicly seeks to 'maximize' federal reimbursements (despite potential harm and injury to [our children and] taxpayers)... Competing against all other states, this can be accomplished only by (1) targeting families with more resources, (2) maximizing each support amount by forcefully and fully separating children from their nonresident parents, (3) allowing the fabrications of 'high conflicts' into the cases only to incentivize the 'feeder network' of colluding professionals, (4) hiding the thus induced legal struggles by the [deliberately falsified] docket records, and (5) concealing wrongdoing from discovery and appeals (and federal penalty inducing corrections) with protecting [racketeering] schemes."

45) Subsequently, as forced indigency is intractable and the resulting controversy and induced judicial deadlock are significant, Father diligently (and correctly) identified the elements of the child-predatory and profiteering agenda-driven

discrimination scheme, i.e., “the act of any employer hiring Father without also preemptively covering his now \$445,000+ of in-arrears obligations for his four children, would immediately deny his ability to perform duties as an employee as his income needed for his own survival would be effectively all garnished.”

Sustained And Systemic Disparate Treatments

46) Through his “mailed-in” complaints to the Massachusetts Commission Against Discrimination (“MCAD”) and his (shortened) testimony in Family Court on 1/30/2025, Father has consistently restated his prior claims as reiterated below:

(1) I have mailed complaints to MCAD pursuant to M.G.L.c. 272, § 98, “main” discriminations (based on sex, gender, and national origin) and subsequent M.G.L.c. 151B, § 9, unlawful practices, i.e., G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination.

(2) In response to a letter from MCAD, I reiterated that, as a consequence of the sustained and systemic direct targeting [and retaliations], I had become forcedly indigent with no phone or any means of physical transportation.

(3) The completed (and now third) multi-state levy on my leftover financial accounts by the DOR CSE did not affect my still skyrocketing and now \$445,000+ of combined in-arrears child supports/court-ordered expenses.

(4) As my [voluntarily disclosed financial] balance sheet lists an “available” \$0.71, I have requested [the Mass. AGO to] review my federal Civil RICO-based proposed complaint pursuant to M.G.L.c. 271A, “Enterprise Crimes.”

- (5) I am a legal immigrant (and now citizen) from Romania who was granted political asylum by the U.S. in 1986 due to my Hungarian nationality, i.e., a “hated” minority and, hence, openly persecuted by the communist tyranny.
- (6) The State continues to deliberately discriminate and/or retaliate/interfere/aid and abet against me by not just allowing but also actively endorsing all the falsified Family Court dockets with “absolute judicial and/or prosecutorial immunity” deceptive justifications repeatedly filed in the Superior Court.
- (7) Specifically, the parallel Family Court dockets continue to fraudulently manifest the deliberate anti-immigrant bias and anti-masculine hatred, as never substantiated but still allowed/encouraged stereotypical projections:
- “[Father] now claims that he has no money, no income, no assets.
- Indeed, he repeatedly disposed of assets during the litigation for less than their actual value, then claimed he was harmed. It is believed that he has hidden assets with his parents, who have returned to Romania.”
- (8) When my family and I left Romania in 1986, we left nothing materially valuable behind. I created my entire net worth through hard work strictly in the U.S. Everything I have ever created stayed in the U.S. and I have nothing of value outside the U.S. Also, my parents have not returned to Romania.
- (9) The SJC ordered me to “create a record” to substantiate claims of sustained and systemic disparate treatment by the thus retaliating State. I immediately complied and diligently assembled my SJC Record staged as SJ-2024-M026.

- (10) In my SJC Record, I substantiated that the State relies on an agenda-driven “discrimination scheme” to conceal that the Family Court’s child-predatory “feminist” and profiteering “LGBTQ+” equity-based routine had knowingly allowed the Mothers to lie on purpose in their filed financial statements (and colluding trial testimonies) about the **\$1,000,000** I had paid just after my 3/19/2008 amicable divorce as part of my proper divorce agreement endorsed by Family Court. Building on the deliberate initial perjuries, sustained and systemic attorney-assisted subornation of perjuries on the Mothers followed.
- (11) Specifically, the original lie fraudulently ballooned into a 4 million dollar purpose-fabricated (for simultaneous deception) “material discrepancy” in my otherwise diligently preserved finances. My SJC Record also documents that the Family Court allowed and encouraged the army of attorneys and professionals, i.e., the Harvard “superstar” psychologist and 400-times-a-GAL’s “feeder network,” to extort millions in “fees” with their routinely created “high conflicts” and all the subsequently staged existential crises.
- (12) I summarized these facts in my substantiated “Affidavit Of Combined Undisputed Facts,” allowed to be filed in the Family Court on 1/2/2025.
- (13) I also explicitly emphasized in my filed SJC Record that the Marxist-inspired deliberate “fabrication of ambiguities and inconsistencies” by the Family Court (and, implicitly, the State) to conceal the allowed multi-million

dollar perjuries (and the subsequently necessitated subornation of perjuries) could only be accomplished by stereotypically discriminating against me.

(14) Deliberate disparate treatments based on sex were needed to abruptly (w/o verifiable evidence, i.e., without the mere stereotypical projections) revert the Family Court's prior decision to grant me my Twins' physical custody.

(15) During my divorce on 3/19/2008, the child-predatory "feminist" Family Court unconditionally allowed the non-biological and "child-abandoning" [Mother-B] (who changed her mind to suddenly wanting nothing to do with her [then only 3.5 yo] toddler children) to forgo contributing financially.

(16) Deliberate disparate treatments based on my national origin were also needed to abruptly (w/o verifiable evidence, i.e., without the stereotypical projections) transfer the custody of the Twins to their uncommitted [Mother-B]. As neither the police nor DCF believed in her ruthlessly executed premeditated "coup" (to preempt [Mother-C's] expected [excessive] demands for child support), the Family Court was presented with a promptly accepted "the [barbaric] Romanian with a [valid U.S.] passport" mere insinuation.

(17) I immediately (and consistently) started complaining about the [therefore explicit] disparate treatments I had received in the Family Court after the deliberately staged "emergency" ex-parte hearing on 5/2/2011. Facing the **900+ malicious errors** I diligently documented in my thus **110-page filed affidavit**, even the 400 times GAL testified in Family Court that she had

made errors in her outrageously inflated “Harvard investigation,” i.e., billed at ~10 times more than the parallel non-Harvard GAL’s [honest] efforts.

(18) As a white, strictly non-LGBTQ+ male and suddenly a non-custodial father of four children, I clearly don’t belong in any otherwise “protected classes” (ignoring my legal immigrant/naturalized U.S. citizen status). Consequently, as in all Stalinist-inspired “guilty until proven innocent” prior tyrannies, the agenda-driven State has an implicit “license” to stereotypically punish me for all the projected harm, injury, abuse, etc., allegedly committed by the never protected “leftover class” members against all the protected classes.

(19) Substantiating my above “discrimination scheme” claims, the State has repeatedly affirmed in Superior Court that “absolute judicial/prosecutorial immunities” apply to even such, thus direct, disparate treatments. However, not even the falsified Family Court dockets ignore my immigrant status.

(20) As only immigrants can be discriminated against with unsubstantiated “has hidden Romanian assets” mere projections by the Mothers, followed by my consistent complaints against this “direct” discrimination, the State’s above “discrimination scheme” is not just a mere G.L.c. 272, § 98, discrimination.

(21) Specifically, I have not claimed that the State had intentions to suddenly punish all “Romanians.” Reiterating my complaints, I have claimed that, to conceal the previously allowed child-predatory/profitteering agenda-driven multi-million dollar perjuries and subornations of perjuries by the Mothers,

the State continues to commit M.G.L.c. 151B, § 9, “unlawful practices,” i.e., M.G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination with the explicit purpose to a) silence my whistleblower voice and b) enslave me to block all my legal actions.

(22) The Mothers’ originating direct discriminations (based on sex and national origin, together) against me in May of 2011 is only the start of the State’s subsequent and, therefore, deliberately targeted M.G.L.c. 151B retaliations, interferences, and aiding and abetting, i.e., mere stereotypical punishments.

(23) As targeted retaliations are themselves explicit discriminations (still based on sex and my national origin) and the thus profiteering State continues to receive the mandated (and, therefore, fraudulently) “maximized” federal [CSE] reimbursements based on my now \$445,000+ of combined in-arrears child-supports and court-ordered expenses, concealing the allowed [and actively encouraged] initial multi-million dollar perjuries/subornations of perjuries is critically important for the State to avoid the federal penalties.

(24) Consequently, the State refuses, even as recently as on 1/16/2025, to investigate discriminatory acts that cannot be immediately categorized as “cookie-cutter” anti-feminist or anti-LGBTQ+ discriminations, even if the facts overwhelmingly substantiate the [directly targeted and retaliatory] acts against members of a “protected class,” i.e., [this **always legal**] immigrant.

(25) Moreover, as a “failure to exercise discretion [regarding the sustained and systemic discriminations and subsequently targeted retaliations based on sex and national origin] is itself a clear abuse of discretion” and, therefore, it is an error of law, the agenda-driven State continues to deliberately discard (only to erase) my consistently submitted **174+ complaints** (or desperate email messages [to a duly assigned representative]), as mere “garbage.”

(26) Statutes of limitations on the initial attorney-assisted perjuries/subornations of perjuries have already expired. However, all subsequent judgments issued as direct consequences of the [consistently claimed] multi-million dollar lies by the Mothers are still subject to Rule 60 fraud on the court reviews with no time limits as **attorney-assisted “clear abuses of judicial discretions”** due to intentional “failure to exercise discretion” regarding the now manifested and proven anti-immigrant bias and child-predatory anti-masculine hatred.

(27) Consequently, I have submitted renewed motions for relief pursuant to Rule 60 fraud on the court. Nevertheless, the State’s targeted retaliations against me, as a “simple” male, have become gender-based discriminations considering my non-feminine, strictly non-LGBTQ+, and [forcedly] non-custodial male status. Specifically, despite being an explicit member of a protected class, i.e., [an always] legal immigrant, the State still targets me with child-predatory “feminist” and profiteering “LGBTQ+” stereotypical projections as part of the “maximized” federal reimbursements-producing

multi-million dollar dual “discrimination schemes” focused precisely on the unprotected but vast always strictly “simple” (non-LGBTQ+) male majority.

(28) Substantiating the child-predatory nature of the State’s Marxist-inspired “discrimination schemes,” I have diligently documented (e.g., on 1/10/2024) that my four children have been deliberately driven to complain about their “feelings of utter fatherlessness” despite that **“extreme parental alienation should be considered emotional child abuse and referred criminally.”**⁶

(29) The State’s directly targeted discriminations (i.e., G.L.c. 151B retaliations, interferences, and aiding and abetting employment discrimination) against me are manifested through the thus deliberately deceptive, obstructive (of all justice), and sabotaging acts organized and executed with a sustained and systemic racketeering pattern. I have now substantiated my claims pursuant to G.L.c. 271A, “enterprise crimes,” building on my Civil RICO complaints.

47) Subsequently, Father attempted to request relief from the Mass. Appeals Court on 1/16/2025. He argued that the most recent phase of the matters started when the Single Justice Appeals Court, No. 24-J-152/153, reiterated on 3/25 and 27/2024 that the denials of motions for relief from judgments “may be reviewed by a panel on appeal, but are beyond the jurisdiction of the single justice.”

48) Accordingly, Father attempted to appeal the denials directly. His appeals to a panel would have relied on the Family Court’s “guilty until proven innocent”

⁶ See https://www.ncsc.org/_data/assets/pdf_file/0014/42152/parental_alienation_Lewis.pdf.

mere stereotypical projections ending on 2/26/2024 with the “NOT GUILTY [for not paying child supports]” finding. This was the first proof since 5/2/2011 of his exposure to the deliberately sustained and systemic disparate treatments.

49) The second proof was the Family Court’s secret 12/5/2013 “gatekeeper” order (revealed to Father only on 4/20/2024), specifically denying his facts/evidence.

50) Moreover, Father’s direct appeals would have argued that the denials on 2/22/2024 of his motions for relief from judgments, i.e., “The [Family] Court finds no evidence of fraud, mail fraud, discrimination based on national origin as alleged, ‘employment discrimination’ or any other basis under Rule 60b,” were based on manifested fraud. Father documented exactly this in his SJC Record:

“The Family Court dockets still reflect on 10/21/2024 that, while Mother-B also filed an opposition to Father’s motion for relief on 2/6/2018, the entire exchange regarding the question of ‘clear abuse of judicial discretion’ (of all prior rulings) in the MI07D3172DV1 docket has been discarded and erased. Nevertheless, the Mother-B docket’s downloadable 7/26/2018 entry repeats (without providing evidence) the anti-immigrant projections, ‘[Father] now claims that he has no money, no income, no assets. Indeed, he repeatedly disposed of assets during the litigation for less than their actual value, then claimed he was harmed. It is believed that he has hidden assets with his parents, who have returned to Romania.’ Evidence for the Family Court receiving both Father’s properly filed motion for relief and Mother-B’s

blatantly anti-immigrant opposition comes from Mother-C's docket MI11W0787WD, from where Father was able to download the '02/12/2018 Opposition to Defendant's Renewed Motion for Relief from Judgments' entry on 10/21/2024 ... the MI11W0787WD docket still reflects on 10/21/2024 that Mother-B's blatantly anti-immigrant bias and hatred, as mere projections without any evidence, have been directly transferred to and specifically adopted by the somehow 'irrelevant' Mother-C matters."

- 51) Father's now complete SJC Record also documents: "Consequently, this SJC's observation (that no sign of direct appeal existed in the dockets) on 5/31/2024 can only be explained by the Family Court deliberately a) discarding the timely notice of appeal, b) concealing that by falsifying the dockets, and c) deceiving about that by committing [18 U.S.C. §§ 1341, 1349] mail fraud [on purpose]."
- 52) Combined, these three substantiated acts by the Family Court have a single and deliberate judicial objective: to deny Father's rightfully, properly, and timely attempted direct appeals of the denials of his substantiated motions for relief from judgment (pursuant to Rule 60 fraud on the court). Therefore, the recent parallel denials, i.e., the first dated 12/11, mailed on 12/16, received on 12/19/2024, and effectively renewed on 1/2/2025, and the second dated 1/2, mailed on 1/6, and ultimately received on 1/10/2025 are mere continuations of [the State's] sustained/systemic efforts to conceal the multi-million dollar perjuries/

attorney-assisted subornations of perjuries allowed to be committed by a child-predatory “feminist” and profiteering “LGBTQ+” agenda-driven Family Court.

REASONS FOR GRANTING THE WRIT

- 53) As a consequence of Father’s repeated petitions, the SJC ordered, C:57, “The court will grant leave if [he] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim,” on 9/26/2024.
- 54) Consequently, Father certified to the SJC on 2/10/2025, C:58, that he had furnished the SJC with his meticulous/verifiable SJC Record and had diligently and systematically exhausted all possible remedies available to him with the: a) Family Court, b) Superior Court, c) Single Justice Appeals Court, d) Mass. Commission Against Discrimination (MCAD), e) Mass. Attorney General’s Office’s (AGO) Civil Rights Division and Criminal Bureau (in conjunction with the Newton Police Department, Newton District Court, and Middlesex District Attorney’s Office regarding his “Proposed Complaint Pursuant To G.L.c. 271A, Enterprise Crime”), f) USDC, g) USCA1, h) the U.S. Attorney, C:11, and i) Massachusetts Governor Maura Healey (by requesting “sanctuary protection and shelter” from the substantiated anti-immigrant/anti-masculine federal Civil RICO-based G.L.c 271A “Enterprise Crime” by the State, C:07).
- 55) Marxist indoctrination builds on a governmental convenience called “equity.”

56) 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.”⁷

57) Just recently, this Court eloquently characterized the “controversy” of equity:

“Today’s 17-year-olds did not live through the Jim Crow era, enact/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).

58) It is no coincidence that this Court decided to address this Marxist-inspired, intractable controversy. Even the prior White House prioritized the matter on 2/16/2023 in the above-referenced (and now voided) Biden’s Executive Order.

59) This case is a well-preserved generalization of the controversy. It showcases the factual consequences of any Marxist “equity” and its effects on the rule of law. By Marxist design, any “equity for all” is a logical impossibility due to the

⁷ See <https://www.nsta.org/science-teacher/science-teacher-julyaugust-2020/equity-all>

social construct's forceful objective, i.e., the always destructive redistribution of already existing wealth and not the merit-based construction of new wealth.

60) Therefore, Father has argued that mail fraud, falsified dockets, and the resulting sabotaged appeals (by discarding his proper/timely notices of appeals) are acts not protected by absolute judicial immunities due to the Respondents' complete absence of any appeal jurisdiction. Specifically, Father concluded on 8/3/2024:

“The above three key events prove that a) disparate treatments exist, b) they extend back to 5/2/2011, and c) the sabotaging of appeals was committed specifically to obstruct justice (i.e., the reviewing of denials of motions for relief from judgments pursuant to Rule 60 fraud on the court) and, therefore, any ‘prior final judgment on the merits’ is invalidated. The concerted effort to sabotage Father’s appeals (and then to conceal the sabotaged appeals) is a clear manifestation that the [State] is not comfortable with the Appeals Court (or the SJC) reviewing the raised questions [about the Marxist ‘equity-based’ agenda and blatant Stalinist-like ‘guilty until proven innocent’ subversions].”

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

62) The explicit focus on any such “accepted” groups led to a Russell's Paradox-like⁸ phenomenon: Do those excluded from all enumerated “specially protect from others” groups have any remaining rights worth protecting? To bypass the

⁸ See <https://plato.stanford.edu/entries/russell-paradox/>.

paradox (with its “we can infer anything from a contradiction” consequence), any Marxist equity-based justice had to (re)introduce the “Gulag Archipelago”⁹ to effectively deal with the unprotected masses having no “equity” left at all.

63) 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 Matters¹⁰ (at 1:19:11 to 1:21:10).

64) The Russell's Paradox only applies to “naive sets,” which are these enumerated groupings exactly. This means that all “leftover” 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.”

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

⁹ See https://en.wikipedia.org/wiki/The_Gulag_Archipelago.

¹⁰ See <https://www.youtube.com/watch?v=37C9hofR6gg>.

- 66) Consequently, Father requested the SJC on 10/14/2024 to finally declare that his "SJC Record to substantiate claims" is complete, and satisfying the required conditions as **"no remedy for discrimination is ever possible if the evidence can be deliberately discarded [or erased] by the perpetrators themselves."**
- 67) Therefore, the SJC's ongoing inaction violates G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination. To substantiate such claims of disparate treatment by the SJC, Father respectfully reiterated that a) he has no assets, property, money, etc. of any kind anywhere, b) his accumulated in-arrears court-ordered obligations for his children have reached \$445K+, and c) he has now unsuccessfully applied to 2,530+ jobs.
- 68) Moreover, the State's manifestly discriminatory "guilty until proven innocent" agenda, i.e., the deliberate subversion of our justice system's core principle, is by definition a "piecemeal" process in this context. The existentially threatened Father has no other alternatives but to keep probing (per "piecemeal litigation") with his reiterated "Here is more proof for my innocence... Am I still guilty?"
- 69) Therefore, the legal immigrant Father reiterates that he has diligently submitted to all the courts his meticulously preserved evidence proving that the State had deliberately bullied him into his now "silenced and enslaved" forced indigency condition, a discriminated existence in violation of the federal Title VI/VII of The Civil Rights Act of 1964 (42 U.S.C. §§ 2000d/e, *et seq.*) which explicitly:

“prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.”

70) Consequently, Father has substantiated his claims that a selective (deliberately unconstitutional) “double protecting” agenda¹¹ has been driving the SJC’s (and also the State’s and Family Court’s) decisions to violate Father’s civil rights:

CONSTITUTIONAL QUESTION #1: The State aims to “double protect” some [of its preferred] citizens at the [direct] expense of [thus] revoking all protections from others, including Constitutional rights. Does [selectively] “double protecting” only some waive Constitutional protections for all?

71) Accordingly, Father respectfully requests that this Court review, in its entirety, the manifested and preserved record of these interrelated proceedings and issue all necessary declaratory and injunctive relief while also ruling on materialized damages for Father. Specifically, he requests a review of the now substantiated: a) all continued intentional and purposeful discrimination based on sex, gender, and national origin; b) all subsequent intentional and purposeful retaliations, interferences, and the aiding & abetting of employment discriminations; and c) all **attorney-assisted** Rule 60(b)(6) fraud on the court deliberately deployed to conceal the organized racketeering acts, i.e., mail fraud, obstruction, retaliation:

CONSTITUTIONAL QUESTION #2: Do any [i.e., specifically, judicial, prosecutorial, or even the already abrogated sovereign] immunities apply to

¹¹ See again https://repository.uclawsf.edu/hastings_constitutional_law_quaterly/vol49/iss2/4/.

an “LGBTQ+” Massachusetts when using federal “reimbursements” to subsidize the forceful separation and agenda-driven extreme alienation¹² of innocent American children from their loving American parents?

72) Father’s SJC Record also documents that, pursuant to M.G.L.c. 215, § 9 and M.G.L.c. 211A, § 10, Father has had a proper basis to repeatedly file his timely “Notices Of Appeals Raising Constitutional Questions” of his parallel Family and Superior Court cases to be ultimately docketed in the full SJC. Specifically, in addition to the above-reiterated two questions, Father had also argued that:

“[Former President Biden’s] Sec. 8. Affirmatively Advancing Civil Rights... to prevent and address discrimination and advance equity for all” clause of the [finally overridden] 2/16/2023 Presidential Executive Order results in Russell's Paradox, and it must be corrected as a logically unacceptable conclusion to a less deceitful mere “equity for some.” Is the mandate to selectively “advance equity” (for only a [chosen some]) Constitutional?”

73) Specifically, in his appellant’s brief filed with the USCA1, Father summarized:

- The Issue Of “Equity For All”: To resolve the flaw in [basic] deductive logic carelessly introduced by naively enumerating the purposely non-inclusive “LGBTQ+” alphabet soup of “specially protect from others” groups without mentioning the always inherently present “leftovers,” i.e., Russell's Paradox, the deceitful “equity for all” promise of [Biden’s] Executive Order must be

¹² See https://www.ncsc.org/_data/assets/pdf_file/0014/42152/parental_alienation_Lewis.pdf.

corrected to a mere “equity for a chosen some” in [**a direct and blatantly discriminatory and predatory**] contradiction with the U.S. Constitution.

- The Issue Of Sovereign Immunity: After growing up as a hated minority in a communist tyranny, Father sympathizes with all minorities. Therefore, the “LGBTQ+” label used herein refers to Father’s already elaborated claim that “as the consequences of [Biden’s] Executive Order, effectively equivalent to mandating new ‘Jim Crow’-like segregation of Americans into the ‘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’¹³ of the [‘garbage’¹⁴] masses.”
- The Issue Of “Dogmatic Interplay”: In his petition, Father substantiated the controversy from lower courts as a “dogmatic interplay” to subvert justice based on individual merit and replace it with justice based on simple [and] convenient, but also an entirely superficial Marxist “group identities.”

74) In his previous petitions to this Court, Father argued that “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, any legal protection for

¹³ See <https://www.cnn.com/videos/politics/2023/10/06/hillary-clinton-maga-cult-extremists-donald-trump-house-republicans-amanpour-cnntm-vpx.cnn>.

¹⁴ See <https://www.cnn.com/2024/10/30/politics/kamala-harris-joe-biden-garbage-comment/index.html>.

‘men who cannot ever get pregnant’ would lower the [thus mandated & already ‘maximized’] federal support reimbursements that the State can extort. Father belongs and represents the ‘fathers who cannot ever get pregnant, are forcefully separated from their children, and are stripped of any constitutional rights,’ a stereotypically fabricated [Stalinist] ‘guilty until proven innocent’ grouping.”

75) Specifically, for the last 13+ years, Family Court deliberately engaged in the “special protection of the two dishonest Mothers from Father” by systemically denying Father’s constitutional rights (for due process and equal protection of the laws) and continually sabotaging his rights to appeal. Family Court resorted to sustained attorney-assisted Rule 60(b)(6) fraud on the court, intentionally deceiving all the other state and federal courts. It issued secretive “gatekeeper” orders only to “double conceal” the thus unlawfully committed discriminations.

76) Substantiating Father’s “dogmatic interplay” claims between state and federal courts, he was ordered to silence, i.e., “[Father] is warned that if he continues to file any future complaints in this [USDC] concerning the proceedings in state court, he may be restrained from filing any future complaints with this [USDC] as well as become subject to other filing restrictions and sanctions.”

77) Despite the substantiated sustained statutory discriminations and deliberate retaliations against Father by the State, the USDC still concluded that “To the extent [Father] seeks injunctive relief against state officials, [he] has not stated a viable claim for relief under the narrow exception to sovereign immunity”

- while deceptively claiming “In conducting this [Title VI violations] review, the [USDC] liberally construes the complaint because [he] is proceeding *pro se*.”
- 78) Moreover, to silence a *pro se* Father, USDC ignored the context of the original Gonzalez-Gonzalez v. U.S. citation as it was carefully qualified: “A *sua sponte* dismissal **may** stand ... [but] *sua sponte* dismissals are **risky** business ... We will uphold a *sua sponte* dismissal only if allegations are patently **meritless**.”
- 79) Continuing with the scheme to “silence & enslave” Father, the USDC asserted that “as a *pro se* plaintiff, [Father] cannot act as a class representative cannot fairly and adequately represent the interests of the class that he has identified.”
- 80) Treating all *pro se* and *in forma pauperis* parties as mere “prisoners,” USDC also ignored the full context of the original Avery v. Powell citation as it was qualified too: “[A]n inmate incarcerated ... [a] *pro se* plaintiff **may** not possess the knowledge and experience necessary to protect the interests of the class ... requiring complex statistical ... evidence.” Yet, **Father is not an incarcerated inmate** but a trained professional, specifically in studying “complex” systems.
- 81) The USDC’s scheme of casting all *pro se* and *in forma pauperis* parties into mere “prisoners” continued by ignoring the full context of the Murphy v. Baker citation as well, specifically that “courts have routinely denied a **prisoner’s** request to represent a **class of prisoners** without the assistance of counsel.”
- 82) The USDC’s reframing of the directly implied Howard v. Pollard opinion is even more troubling as it deliberately disregarded the original intent/reasoning:

“We deny the ... petition because it does not raise a novel issue of class-certification law and the petitioners do not establish that the denial of class certification signals the death knell of their action ... decisions establish that it is **generally** not an abuse of discretion to deny class certification on the ground that a *pro se* litigant is not an adequate class representative ... But the purpose of Rule 23(g) is not to enable *pro se* plaintiffs to obtain counsel ...; the purpose is to ensure that the proposed class counsel is adequate.”

83) Regardless, with President Trump’s just issued ‘Ending Illegal Discrimination And Restoring Merit-Based Opportunity’¹⁵ Presidential Action, all previous, Marxist-inspired “equity-based” (mere social justice) presumptions have been rescinded and all new claims for federal Title VI/VII civil rights violations will have to be reviewed based on the individual merits (and by the book, B:202).

84) Consequently, Father will renew his USDC complaint on 5/13/2025, C:01.

CONCLUSION

85) Therefore, while the SJC has denied Father’s previous motions for leave, his now diligently submitted SJC Record corroborates his consistent claims of the thus sustained/systemic, deliberately disparate treatments by the Respondents.

86) Specifically, the State continues to assert that deliberate discarding of Father’s submissions & erasing of his evidence (only to retaliate, interfere, and conceal

¹⁵ See again <https://www.whitehouse.gov/presidential-actions/2025/01/ending-illegal-discrimination-and-restoring-merit-based-opportunity/>.

the substantiated disparate treatments, and aid and abet his total employment discrimination) is protected by “absolute judicial & prosecutorial immunities.”

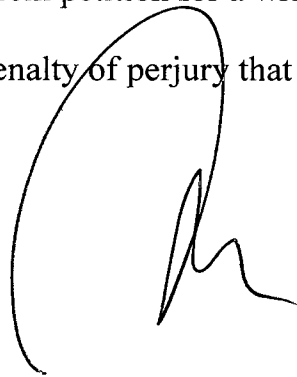
87) Despite knowing that the now undocumented immigrant Father’s shelter is torn down, C:85, Family Court continues to manifestly abuse the above-revealed “anything goes” loophole created by the SJC with Rule 5 of the Mass. R.E.F.

88) Therefore, without intervention by this Court, the endless discrimination and directly targeted retaliation against Father (by sabotaging his lawful ability to request relief from the Stalinist “guilty until proven innocent” judgments and orders) will only continue. Accordingly, Father respectfully requests that this U.S. Supreme Court a) review, in its entirety, the now manifested and diligently preserved record of all these interrelated proceedings; b) consolidate all of Father’s state and federal matters, and c) issue all necessary declaratory and injunctive reliefs while also ruling on the 14 years of materialized damages.

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.

March 1, 2025,
May 5, 2025,



Respectfully submitted,
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