

ORIGINAL

25-6878

No. _____

FILED

OCT 06 2025

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 Supreme Judicial Court Of Massachusetts
Nos. SJ-2025-M006 and DAR-30493

IMRE KIFOR'S PETITION FOR WRIT OF CERTIORARI

February 16, 2026

Imre Kifor
32 Hickory Cliff Rd.
(mailbox only, house torn down)
Newton, MA 02464
ikifor@gmail.com
(857) 340-8699
(by the 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/ and also attached herein in Appendix E.

² See the “Parental Alienation Can Be Emotional Child Abuse” NCSC article in Appendix B.

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 Joy Campbell (in official capacity),
- 4) Commissioner Geoffrey E. Snyder (in official capacity, Department of Revenue, Child Support Services Division),
- 5) Middlesex Division of the Probate and Family Court Department,
- 6) Yale School of Medicine (Pediatric Gender Program, 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.
Order entered 9/5/2025.
41. Kifor v. Massachusetts, et al., 24-7282, U.S. Supreme Court. Conference on 9/29/2025.
42. Kifor v. Duchesne/Oulton, 2025-J-0342 and 2025-J-0343, Mass. Single Justice Appeals Court. Petitions denied 5/14/2025.

43. Kifor v. Duchesne, 2025-J-0360, Mass. Single Justice Appeals Court. Petition denied 5/28/2025.
44. Kifor v. Oulton, 2025-J-0521, Mass. Single Justice Appeals Court. Petition denied 7/29/2025.
45. Kifor v. Commonwealth et al., 1:25-cv-11831-AK, U.S. District Court for the District of Massachusetts. Docketed 6/25/2025.
46. Kifor v. Commonwealth et al., 2025-P-0855, Mass. Appeals Court. Docketed 7/14/2025.
47. Kifor v. Commonwealth et al., DAR-30493, Mass. Supreme Judicial Court. Denied 9/19/2025.
48. Kifor v. Duchesne/Oulton, 2025-J-0595 and 2025-J-0596, Mass. Single Justice Appeals Court. Denied 9/9/2025.
49. Kifor v. Duchesne, 2025-J-0644, Mass. Single Justice Appeals Court. Petitions Denied 9/9/2025.

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³ See at https://repository.uclawsf.edu/hastings_constitutional_law_quaterly/vol49/iss2/4/.

⁴ See at <https://scholarship.law.cornell.edu/cgi/viewcontent.cgi?article=2941&context=clr>.

TABLE OF AUTHORITIES CITED⁵

- 1) Adoption of Zoltan, 71 Mass. App. Ct. 185 (Mass.2008),
- 2) Ames v. Ohio Department of Youth Services, 605 U.S. _ (2025),
- 3) Bain v. City of Springfield, 424 Mass. 758, 763 (Mass. 1997),
- 4) Barrett Assoc., Inc. v. Aronson, 346 Mass. 150 (Mass. 1963),
- 5) Bercume v. Bercume, 428 Mass. 635 (Mass. 1999),
- 6) Blanchette v. School Committee of Westwood, 427 Mass. 176, 184 (Mass. 1998),
- 7) Boston Edison Co. v. Board of Selectmen of Concord, 355 Mass. 79, 83 (Mass. 1968),
- 8) Briggs v. Carol Cars, Inc., 407 Mass. 391 (Mass. 1990),
- 9) Brown v. Gerstein, 17 Mass. App. Ct. 558 (Mass. App. Ct. 1984),
- 10) Canavan's Case, 432 Mass. 304, 308 (Mass. 2000),
- 11) Carey v. Piphus, 435 U.S. 247 (1978),
- 12) Carter v. Housing Authority, 450 Mass. 626 (Mass. 2008),
- 13) Cashman Equip. Corp. v. Penny, 19-P-1814 (Mass. App. Ct., 2021),
- 14) Comey v. Hill, 387 Mass. 11, 19 (Mass. 1982),
- 15) Commonwealth v. Alphas, 430 Mass. 8 (Mass. 1999),

⁵ The relevant text of the cited cases and statutes appears in Appendix D. *Passim* is implied throughout.

- 16) Commonwealth v. Fredette, 56 Mass. App. Ct. 253, 260 n.10 (Mass. App.Ct. 2002),
- 17) Commonwealth v. Hatch, 438 Mass. 618, 623 (Mass. 2003),
- 18) Commonwealth v. Knight, 392 Mass. 192, 193-94 (Mass. 1984),
- 19) Commonwealth v. Souza, 492 Mass. 615, 626 (Mass. 2023),
- 20) Dawson v. Equity Investment Group, No. No. 2001517 (Mass. Cmmw. Aug. 11, 2006),
- 21) Edwards v. Aetna Life Ins. Co., 690 F.2d 595, 599 (6th Cir. 1982),
- 22) East Cambridge Savings Bank v. Wheeler, 422 Mass. 621, 623 (Mass. 1996),
- 23) Fitzpatrick v. Bitzer, 427 U.S. 447 (1976),
- 24) Furtado v. Furtado, 380 Mass. 137 (Mass. 1980),
- 25) Great Northern Ins. Co. v. Read, 322 U.S. 47, 54 (1944),
- 26) Griffin v. Breckenridge, 403 U.S. 88 (1971),
- 27) In re Birchall, 454 Mass. 837, 838-39 (Mass. 2009),
- 28) J.A. Sullivan Corp. v. Commonwealth, 397 Mass. 789, 792, 494 N.E.2d 374 (1986),
- 29) Jackson v. Birmingham Bd., 544 U.S. 167, 168 (2005),
- 30) Johnson v. Commonwealth, 977 N.E.2d 541, 544 (Mass. 2012)
- 31) Judge Rotenberg Educ. v. Comm. of the Dep. of M. R, 424 Mass. 430, 443 (Mass. 1997),
- 32) Kendall v. Selvaggio, 413 Mass. 619 (Mass. 1992),

- 33) Lamoureux v. Supdt. Mass. Correctional Inst. Walpole, 390 Mass. 409 (Mass. 1983),
- 34) Laramie v. Philip Morris USA Inc., 488 Mass. 399, 405, 173 N.E.3d 731, 741 (2021),
- 35) Lopez v. Commonwealth, 463 Mass. 696, 703 (Mass. 2012),
- 36) Lopez v. Mass., 588 F.3d 69, 86 (1st Cir. 2009),
- 37) Martinez v. Newport Beach, 125 F. 3d 777, 785 (9th Cir. 1997),
- 38) McHugh v. Commonwealth, 97 Mass. App. Ct. 1104 (Mass. 2020),
- 39) Mireles v. Waco, 502 U.S. 9, 11-12 (1991),
- 40) Mole v. University of Massachusetts, 442 Mass. 582,591-92 (Mass. 2004),
- 41) O'Brien v. DiGrazia, 544 F.2d 543, 546 n.3 (1st Cir. 1976),
- 42) Otis v. Arbella Mutual Insurance Company, 443 Mass. 634, (Mass. 2005),
- 43) Parrell v. Keenan, 389 Mass. 809 (Mass. 1983),
- 44) Precision Co. v. Automotive Co., 324 U.S. 806, (1945),
- 45) Pelican Production Corp. v. Marino, 893 F.2d 1143 (10th Cir. 1990),
- 46) Pennhurst State School Hosp. v. Halderman, 465 U.S. 89, 155 (1984),
- 47) Pollock v. Williams, 322 U.S. 4, 18 (1944),
- 48) Pulliam v. Allen, 466 U.S. 522, 541-42 (1984),
- 49) Psy-Ed Corp. v. Klein, 459 Mass. 697, 707 n.24 (Mass. 2011),
- 50) RCN-BecoCom, LLC v. Commissioner of Revenue, 443 Mass. 198, 204 (Mass. 2005),

- 51) Rockdale Management Co. v. Shawmut Bank, N.A., 418 Mass. 596, 598 (Mass. 1994),
- 52) Sahin v. Sahin, 435 Mass. 396 (Mass. 2001),
- 53) Salvesen v. Salvesen, 370 Mass. 608 (Mass. 1976),
- 54) Sax v. Sax, 53 Mass. App. Ct. 765 (Mass. App. Ct. 2002),
- 55) Stump v. Sparkman, 435 U.S. 349 (1978),
- 56) Sullivan v. Chief Justice, 448 Mass. 15, 24 (Mass. 2006),
- 57) Trillium, Inc. v. Cheung, 11-P-727 (Mass. Feb. 21, 2012),
- 58) U.S. v. Ballek, 170 F.3d 871 (9th Cir. 1999),
- 59) U.S. v. Williams, 121 F.3d 615, 620-21 (11th Cir. 1997),
- 60) 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)
- 2) Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, *et seq.*
- 3) Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*
- 4) Age Discrimination in Employment Act of 1967 (29 U.S.C. § 621, *et seq.*)
- 5) Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-6107)
- 6) Deprivation of Civil Rights (42 U.S.C. §§ 1981, 1983, and 1985)
- 7) Racketeer and Corrupt Organizations Act, 18 U.S.C. §§ 1961-1968
- 8) Attempt and Conspiracy: Mail Fraud, 18 U.S.C. §§ 1341, 1349

- 9) Unlawful discrimination, Massachusetts G.L.c. 151B
- 10) Massachusetts G.L. c. 211, § 3
- 11) Massachusetts G.L. c. 211A, § 10
- 12) Massachusetts G.L. c. 215, § 9
- 13) Massachusetts G.L. c. 231A
- 14) Massachusetts G.L. c. 249, § 4
- 15) Indigency Laws, Massachusetts G.L. c. 261, §§ 27A-D
- 16) Massachusetts G.L.c. 271A, Enterprise Crime.

**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 decisions of the Massachusetts Supreme Judicial Court (“SJC”) below.

OPINIONS BELOW

Appendix A contains the two final decisions of the SJC to review the merits of.

While Father’s previous petitions to this Court addressed the SJC’s agenda-driven¹ sequence of prior decisions regarding the same matters, i.e., SJ-2022-0041 & 0193 & 0271 & 0380 & 0407, SJ-2023-0028 & 0122 & M014, SJ-2024-M008 & M010 & M026, SJC-13263 & 13310 & 13339 & 13392 & 13427, this now fifth petition is exclusively about the two final, i.e., **SJ-2025-M006** and **DAR-30493**, decisions.

Appendix B contains the SJC’s latest sequence of orders for Father to assemble his “SJC Record” with Father’s proofs of assembly. As these proofs have already been filed with the Massachusetts Appeals Court (docket No. 2025-P-0855), the SJC’s related DAR-30493 decision renders them relevant and also required for the herein petition. Directly contradicting the SJC’s representations (and two final decisions), the purported “other adequate remedies” are presented in Appendix C. Appendix D substantiates the **continued conspiracy to conceal** the induced (Marxist-inspired)

¹ See again “State Constitutional Law Declares Its Independence...” attached in Appendix E.

judicial “ambiguity & inconsistency,” deliberately permeating the SJC’s sequence of decisions. Referenced cases & statutes are diligently reproduced in Appendix E.

JURISDICTION

As these meticulously preserved matters are manifestations of intractable conflicts in the state court interpretations of federal law, and to maintain consistency/ensure supremacy of federal law across the nation, the jurisdiction of this Supreme Court is invoked under 28 U.S.C. § 1257. Father’s requests are made pursuant to **Rule 10 (b)**, “a state court of last resort has decided an important federal question in a way that conflicts with the decision of another state court of last resort or of a court of appeals”; **Rule 12.4**, “When two judgments are sought to be reviewed on a writ of certiorari to the same court and involve identical or closely related questions, a single petition for a writ of certiorari covering the [two] judgments suffices”; **Rule 13.1**, “Unless otherwise provided, a petition for a writ of certiorari to review a judgment in any case, civil or criminal, entered by a state court of last resort... is timely when it is filed with the Clerk of this Court within 90 days after entry of the judgment. A petition for a writ of certiorari seeking review of a judgment of a lower state court that is subject to discretionary review by the state court of last resort is timely when it is filed with the Clerk within 90 days after entry of the order denying discretionary review”; and **Rule 14.1 (e)**, as the dates of the two SJC decisions, i.e., SJ-2025-M006 & DAR-30493, were 9/5 & 9/19/2025, respectively.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- “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;
- “Action in the nature of certiorari,” i.e., Massachusetts G.L.c. 249, § 4;
- 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;
- Unlawful “main” discriminations in a public place based on color, race, 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., Massachusetts G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination;
- Title VI/VII of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d/e, *et seq.*);
- 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.

STATEMENT OF THE CASE

- 1) The SJC denied Father's continued requests to lift the **secretive "gatekeeper" orders** -- that effectively and systemically implement a deeply child-predatory "feminist" and obscenely profiteering "reverse discrimination" (or "LGBTQ+") agenda by the Commonwealth of Massachusetts ("State") -- on 9/5/2025, A:01².
- 2) Moreover, the SJC also issued "FURTHER ORDERS," i.e., "[Father] is hereby prohibited from filing any new papers, or from seeking to open any new case in the [SJC], where such papers, or such new case, arise out of the underlying trial court matters..., as well as any and all appeals taken from such matters," A:02.
- 3) Accordingly, the SJC denied Father's timely "Application for Direct Appellate Review," C:203, on 9/19/2025, A:08. Father's application was based directly on his "Amended Petition To Correct And Prevent Errors Pursuant To G.L.c. 211, § 3, Due To Discrepancy Between State And Federal 'LGBTQ+' Discrimination Law," C:05, in the context of a properly docketed appeal, A:09 and B:01, with a docketed "Appellant's Brief," B:136, and 9-volume "Record Appendix," B:199.
- 4) Therefore, a contextual review of the two related SJC decisions is sought, as the underlying agenda leads to endlessly renewed complaints for discrimination -- manifested in both the U.S. District Court, District of Massachusetts ("USDC"), docket Nos. 1:20-cv-11601-PBS, 1:21-cv-11968-IT, 1:22-cv-11141-PBS, 1:22-cv-11948-PBS, 1:23-cv-12692-PBS, 1:25-cv-11831-AK; and in the U.S. Court

² Pages of the appendix are denoted by *V:p*, with "V" the volume letter and "p" the page number.

- of Appeals, First Circuit (“USCA1”), docket Nos. 23-1008, 23-1013, and 24-1075 (also the subject of Father’s prior petition in this Court, No. 24-7282).
- 5) Father’s now fifth petition for a writ of certiorari in this Court is a continuation of his first (docketed as 22-7115 on 3/27/2023), second (docketed as 23-5932 on 11/1/2023), third (docketed as 23-6398 on 12/26/2023), and fourth petition (docketed as 24-7282 on 5/23/2025) -- all as *pro se* and filed *in forma pauperis*.
 - 6) The decision of USCA1 24-1075 (which Father requested to be reviewed in his prior petition, No. 24-7282), was the appeal of the *sua sponte* dismissal of his second Civil RICO class action complaint -- the underlying federal matter that was built upon and referenced the originating controversy in the State (docketed or “staged” as the SJC’s SJ-2024-M026/SJ-2025-M006, B:17-133) and having the same parties, the same facts, and raising the same constitutional questions.
 - 7) Relevant substantiating references to the SJC dockets were already included as manifestations of an alleged **dogmatic interplay** between the state and federal courts. In fact, Father’s petition No. 23-5932 in this Court substantiated that the SJC’s decision on 8/8/2023, C:108, was the direct cause of action for Father’s second Civil RICO class action complaint, docketed with USDC on 11/8/2023.
 - 8) Significantly, USDC already noted on 11/22/2022 that, “Put more simply, [he] maintains that Family Court, on multiple crucial occasions, deliberately failed to notify [him] of its rulings, which resulted in [Father] not being able to appeal the same,” despite the USDC dismissing Father’s first Civil RICO complaint.

- 9) Accordingly, Father's second Civil RICO class action complaint established that the claimed discriminatory (and subsequently targeted retaliatory) acts and willful conduct were identical to the substantiated RICO prohibited activities.
- 10) As Father's second Civil RICO complaint directly referenced that Congress had abrogated the states' sovereign immunity for all the cited discrimination statutes, his filed evidence unequivocally contradicted the claims deceptively made by the State on 2/10/2023, and submitted to USCA1, No. 23-1008, i.e.,
"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."
- 11) Accordingly, pursuant to M.G.L.c. 211, § 3, Father amended his SJC petition, C:05, by again "seeking relief from the public nuisance, e.g., discriminatory/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. Immediate and meaningful relief is necessary to prevent the State... from undermining the rule of law and to ensure that the citizens of the [State] may safely, free of discrimination and retaliation, earn a living/nurture and care for their children and families" on 6/15/2025, while concluding that:

“Father substantiated in his original petition on 2/10/2025 that the State had deliberately subverted the ‘innocent until proven guilty’ core principle of our rule of law while secretly replacing it with a manifestly profiteering agenda (for the ‘maximized’ federal reimbursements) and a Stalinist-inspired ‘guilty until proven innocent -- but with all proofs purposefully discarded/evidence outright erased.’ Significantly, as Father could only rely on the symptoms of ‘all proofs purposefully discarded & evidence outright erased’ in his original petition, e.g., his mailed-in and hand-delivered submissions never making it to court dockets, his subsequently submitted record reveals not only proofs of committed direct obstructions of justice but also demonstrates the concise mechanisms behind the deliberate ‘reverse discrimination’ scheme that the State used as the [basis] for its child-predatory ‘feminist’ and profiteering ‘LGBTQ+’ agenda. **As reverse discrimination has never been recognized by Mass. law**, this intentional scheme, which silences & enslaves a majority for [the fraudulently maximized] federal reimbursements, directs the Mass. Commission Against Discrimination (“MCAD”), Mass. Attorney General’s Office (“AGO”), the Superior Court, etc., to endlessly reject his complaints.”

12) In his amended petition, Father also reiterated on 6/15/2025, “The erroneous court proceedings are ongoing in [both] the Middlesex Probate And Family Court (‘Family Court’) and the Middlesex Superior Court (‘Superior Court’).”

- 13) Moreover, according to SJC's orders on a) 8/8/2023, i.e., "It is incumbent on a petitioner for extraordinary relief 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 relief is warranted," SJC-13427 or C:108, as well as b) 9/26/2024, i.e., "The court will grant leave if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim," SJ-2024-M026 or B:64, Father diligently furnished the SJC with his meticulously preserved and redundantly filed "SJC Record," as the staging dockets SJ-2024-M026 & SJ-2025-M006, B:18, A:04.
- 14) In summary, Father's assembled SJC Record documents the State's endlessly repeated instances of a) deliberate disparate treatment, b) followed by Father's immediate opposition, and c) concluding with the State's targeted retaliations.
- 15) Father also complained about his due process and equal protection of the laws violations to the DOJ's Civil Rights Division. Following it, the DOJ's Criminal Division directed him to contact the FBI, D:51-64. Accordingly, Father mailed his renewed/updated RICO complaint to the FBI Director on 9/8/2025, C:284.
- 16) Specifically, Father concluded to USDC on 9/9/2025, C:331, that "As there is no attempt in any of the state courts to differentiate among the wide-ranging facts, i.e., [**the entirety of Father's 'individual facts'** (except for his 'white, straight, and useless legal immigrant male' political identity)] **must be erased**

and never reviewed, constitutional due process and equal protection of the laws apply [to all the proceedings in state courts, including the SJC,] without any of the distractions imposed by the various [state] courts' jurisdictions."

17) Accordingly, Father requested the SJC's "direct appellate review" on 8/1/2025:

Pursuant to Mass. R.App.P. Rule 11(a), "Within 21 days after the docketing of an appeal in the Appeals Court, any party to the case may apply in writing to [the SJC] for direct appellate review," [Father] respectfully requests this Court to grant direct appellate review of the three to-be-[paired] cases, as **together** they present: a) questions of first impression -- Can the child-predatory and profiteering "LGBTQ+" agenda-driven [State] deliberately target a majority with "reverse" discrimination?; b) questions of law concerning the Constitution -- The State aims to "double protect"³ some of its citizens at the expense of revoking protections from others, including Constitutional rights. Does selectively "double protecting" only some waive Constitutional protections for all?; and c) questions of public interest -- Do judicial, prosecutorial, sovereign, etc., immunities apply to an "LGBTQ+" State when using the [thus manifestly fraudulently] "maximized" federal reimbursements to subsidize the forceful separation and agenda-driven extreme alienation of [our dear] children from their loving parents? C:205.

³ See again "State Constitutional Law Declares Its Independence..." attached in Appendix E.

18) As partial facts can prove no claims of conspiracy, Father intended early on to pair the Superior Court appeal with the 2 parallel Family Court appeals, B:01.

19) Moreover, the appealed 5/12/2025 Superior Court judgment is a concise proof that Massachusetts law does **not** recognize “reverse discrimination” against the straight and white male majority (even when they are the despised or “useless” “legal” immigrants), see this Court’s Justice Ketanji Brown Jackson’s opinion and ruling in Ames v. Ohio Department of Youth Services, 605 U.S. _ (2025):

“The law’s focus on individuals rather than groups is anything but academic. By establishing the same protections for every ‘individual’ -- without regard to that individual’s membership in a minority or majority group -- Congress left no room for courts to impose special requirements on majority-group plaintiffs alone ... Our case law makes clear that the standard for proving disparate treatment under Title VII does not vary based on whether or not the plaintiff is a member of a majority group. Accord, *Bostock*, 590 U.S. at 659, ‘This statute works to protect individuals of both sexes from discrimination & does so equally,’ the background circumstances rule flouts that principle.”

20) Consequently, as Title VI/VII directly applies to the fraudulently “maximized” federal reimbursement-deciding/collecting Family Court/DOR CSS/State “hub-and-spokes” colluding enterprise, a concealing “absolute judicial/prosecutorial immunities apply” excuse for the deliberate “reverse discriminations” against Father -- or, in fact, a **confirmed outright “gaslighting”** by the State, B:319 --

raises the same constitutional questions that Father has been repeating in this Court. Therefore, piecemeal, i.e., non-paired or mere “gatekeeping,” reviews would manifestly waste judicial resources without adequately addressing the raised existential issues (and the paradox-inducing “LGBTQ+” contradictions).

21) To substantiate his claims, Father explicitly identified to the FBI Director the material changes that have occurred since 7/13/2022 (when he first formulated his still manifested federal Civil RICO conspiracy claims in USDC) as follows:

“Since the [recently revealed] secret 12/5/2013 ‘gatekeeper’ order [B:193] -- deliberately concealing Father’s ‘Offer of Proof’ submitted on 11/25/2013 [B:194] --, the Family Court’s manifested objective had been to effectively erase all of Father’s preserved evidence and easily verifiable facts from his three... dockets -- **only to ‘sanitize’ [the dockets] from federal scrutiny.**”

22) Father had also substantiated to the SJC that the docket entries continue not to reflect the factual reality of his proper filings and the Family Court’s orders.

23) He had documented that the judicial deadlock (purpose fabricated by Family Court through the allowed fraudulent and frivolous complaints for contempt) was an endless “war of attrition” aimed at delaying investigations and denying Father's requests for relief from his induced (and retaliatory) forced indigency.

24) Specifically, Father duly petitioned the SJC for relief already on 5/7/2023 with:

“The Family Court’s capricious or never communicated *ad hoc* ‘gatekeeper’ orders are arbitrary, untraceable, and unappealable (they are not based on

statutes) instruments that are the definition of targeted discriminations and silencing retaliations ‘backdoors’ into the Family Court’s activist ‘legal machinery’ that Title VI was intended to prevent...” as all “systemic child abuses and agenda-driven parental alienations were effectively concealed when the Family Court ignored Father’s duly submitted filings on 2/3/2014 while stripping [Father] of his protective legal custody of his dear children. Predictably, this occurred just after the 12/5/2013 ‘gatekeeper order’ was [secretly] issued by the Family Court,” see docket SJC-13427 or C:108.

25) The SJC Record now 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 discrimination and subsequent direct retaliation 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.

26) These “Three Key Events” together constitute the substantiated proof for the claims stated herein. Consequently, the parallel 1/30/2025 hearings in Family Court provide direct evidence for the “clearly manifested mechanism,” 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, required supporting] evidence in the Family Court,' but
- b) 'If he spends any money (but doesn't first pay his usuriously accumulated and now [\$490,000+] 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 prior pleadings & evidence).'"

27) As these cycles of unlawful acts have continued to occur for the last 14+ 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, obstruction of justice, and retaliation.

28) Starting with his first Civil RICO complaint, Father named the "Enterprise" as the association in fact of the thus colluding and 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)."

29) The latest instances of mail & wire fraud, obstruction of justice, and retaliation were committed by the Family Court since the parallel hearings on 1/30/2025.

30) Father substantiated all these acts in his affidavit e-filed on 9/23/2025, D:149:

“Father has been documenting in his SJC Record that this Family Court had been falsifying the court dockets, discarding submissions, and deliberately erasing verifiable, **and now uncontested**, comprehensive facts. Father has also documented that he [had been unable] to pinpoint the sabotaging acts while he was forced to mail in submissions. Nevertheless, as soon as this Family Court switched to e-filing -- therefore implementing a proper handshake protocol via emailed receipts of the completions of individual steps -- Father started collecting and monitoring the receipts and now has a complete record of proofs of the Family Court’s sustained/systemic unlawful acts of [discriminations and retaliations. Accordingly,] on 7/21/2025, Father testified that he had requested the docketing of the 437 uncontested facts a total of $5 \times 3 + 1 = 16$ times on 1/23, 1/30, 3/20, 3/31, 4/15, and 4/28/2025:

These were the first instances that manifestly and verifiably demonstrate how Family Court deliberately falsifies dockets, as Judge Allen’s denials confirm the resulting ‘lack of facts’ on 5/8/2025. Specifically, Father’s SJC Record has verifiable evidence that **a) his pleadings are discarded by case managers and b) his comprehensive and uncontested facts are verifiably erased**, repeatedly on [now] 16 occasions. This Family Court deceptively ‘allows’ the requests for permission to file the 77-page-long documents, only to docket a mere two meaningless pages. With the 437 uncontested facts deliberately erased from the dockets, the Family Court

is intentionally falsifying dockets so that the 6 justices named in Father's 12 motions for relief from Rule 60 fraud on the court can claim 'no facts.'

31) Consequently, Father substantiated the above in his 9-volume Record Appendix of his three Family Court dockets to the Appeals Court, 2025-J-644, D:98-134.

32) Moreover, on 2/13/2026, he renewed his complaints for continued conspiracy to discriminate with the a) AGO -- both Civil Rights Division and Criminal Bureau, b) local U.S. Attorney's Office, and c) local FBI Special Agent, D:03.

33) Father's new complaints were based on the events that unfolded during the trial in Family Court on 2/10/2026, i.e., "Contradicting the '**collect the Mothers' signatures**' verbal order by a non-white female judge on 7/21/2025 (with [his] request for the hearing transcript denied), the white male judge on 2/10/2026 immediately questioned Father's attempt to request Mother-B's signature, i.e., 'You didn't expect her to sign your stipulation only to incriminate herself [in federal court].' Father responded, 'Of course not, Your Honor. But I also had to follow this Court's [verbal] order.' Significantly, after explicitly requesting that Atty. Xavier read out loud the statute for the 'discrimination in a public place,' G.L.c. 272, § 98, the same white male judge also asserted that 'I am certainly not discriminating.' Father immediately agreed. It became obvious that even the most basic details were hidden from the new judge on 2/10/2026, e.g., that parallel cases existed with [2] colluding mothers and that the DOR and federal courts had also been involved. Despite Father supporting his submissions on 2/

6/2026 with [two] affidavits and $113 + 637 + 200 + 161 + 73 = 1,184$ pages of comprehensive 'individual facts,' the online docket on 2/11/2026 demonstrates [D:295-314] that none of [his] diligently e-filed affidavits nor a single page of his uncontested 'individual facts' were docketed and available for a white male judge -- who made an explicit effort to avoid reverse discriminating in a public place against a straight white father & 'useless' legal immigrant. Significantly, as manifested in the attached [supported] Pretrial Memorandum filed for the 2/10/2026 conference in the Family Court [C:415-594], Atty. Xavier continued to deliberately misrepresent the extensive facts by claiming, 'In an effort to avoid any future harassment and court-intervention, [Mother-B] would agree to a termination of the Father's child support obligation, the **only** possible relief available to him,' directly and knowingly contradicting the SJC-13427 order on 8/8/2023, i.e., 'To the extent [Father] 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' [C:110]. The deeply child-predatory 'feminist' and the obscenely profiteering 'LGBTQ+' reverse discrimination scheme -- served up to the Family Court by Atty. Xavier -- was intended to pit the straight white mothers & father against each other by either a) signing incriminating stipulations, or b) abandoning **\$549,082+** of combined (parallel) child supports[/expenses/interest], ruthlessly damaging the innocent 4 Massachusetts children. With Atty. Xavier's **conspiracy-reinforcing scheme,**

the Family Court was set to close the matters on 2/10/2026 without having to docket any of [Father's] 'individual facts' -- as a straight white father and a 'useless' legal immigrant, allowing the Gov. Healey administration to escape any investigations regarding the attached summarizing 'Dear President Trump, I have the proof for the prescribed five elements of [the deeply child-predatory feminist and the profiteering LGBTQ+] fascism in Massachusetts' [D:286]."

STATEMENT OF FACTS

34) Father is a white and straight (i.e., non-LGBTQ+) male, and a legal immigrant from Romania, the former communist tyranny. After growing up as a deeply hated minority in the Ceaușescu dictatorship, **Father sympathizes with all minorities**. Therefore, the "LGBTQ+" label used herein only refers to Father's elaborated claim (see his prior petition No. 24-7282) that, "as the consequence of [Pres. Biden's 2/16/2023] Executive Order, effectively mandating new 'Jim Crow'-like segregation of Americans into 'double protected with equity' and 'unprotected with no equity at all' disjoint camps, the implied Stalinist-inspired 'American Gulag Of Leftovers' can be categorized only as a beginning for the 'forced deprogramming'⁴ of the [former U.S. President's 'garbage'⁵] masses."

⁴ See <https://www.cnn.com/videos/politics/2023/10/06/hillary-clinton-maga-cult-extremists-donald-trump-house-republicans-amanpour-cnntm-vpx.cnn>.

⁵ See <https://www.cnn.com/2024/10/30/politics/kamala-harris-joe-biden-garbage-comment/index.html>.

35) 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 the Family Court just after lying to both the police and the Mass. Department of Children and Families (“DCF”) on 4/28/2011 (and thereafter).

36) The Family Court started discriminating against Father based on his sex by first assigning him physical custody of his Twins without any child support in 2008 and then stealing the Twins from Father 4 years later, only to “maximize” child support for the Twins’ non-biological and “abandoning” Mother-B. The Court also discriminated against the naturalized citizen Father based on his national origin. The deeply child-predatory “feminist” and also profiteering “LGBTQ+” agenda (driving the Family Court’s discrimination) was initially a reflection of Hillary Clinton’s proclamation⁶: “The government has no business in abortion decisions. **We are not Romania.** I’ve been to countries where governments ... forced women to bear children, like they used to in [the barbaric] Romania.”

⁶ See https://www.huffpost.com/entry/hillary-clinton-abortion-debate_n_5808457de4b0180a36e92518.

- 37) Specifically, the Family Court unconditionally endorsed the factually false and thoroughly infantile (in QAnon-style) mere fabrications of a notoriously cruel and ruthless Harvard “activist” psychologist and the 400 times Massachusetts “superstar” Guardian *ad Litem* (“GAL”), i.e., “[Twin] is afraid the father will ‘put suction cups on her feet and take her out the window’ and [Twin] is afraid the father would ‘put him in boiling water’ if he went back in the father’s care.”
- 38) The Family Court explicitly discriminated against the “barbaric Romanian,” as Father “might have considered” fleeing the country (with the application of the right amount of bullying) solely due to him having a U.S. passport. The Court also continued to discriminate against Father with baseless, mere projections, i.e., “[Father] now claims that he has no money, no income, no assets. Indeed, he repeatedly disposed of assets during the litigation for less than their actual value, then claimed he was harmed. It is believed that he has hidden assets with his parents, who have returned to Romania,” fraudulently & repeatedly injected into the parallel court dockets. In fact, **Father has no money, property, assets, etc., anywhere.** Furthermore, his parents and family did not return to Romania.
- 39) Only immigrants can be discriminated against with mere projections like “[he] has hidden Romanian assets.” Such deliberate deceptions & misrepresentations (allowed to continue in the Family Court to the present day) also had the now clearly manifested objective of concealing the a) multi-million-dollar perjuries/ attorney-assisted subornation of perjuries, b) the obscene extortion by “elite”

lawyers and professionals of an **estimated \$1,265,112** from the parties, c) clear abuses of (the thus trivial) judicial discretions, and d) subsequently committed & deliberately sustained and systemic Rule 60(b) fraud and fraud on the court.

40) Consequently, Father diligently documented that the discriminations started on 5/2/2011, when Family Court stole his dear Twins from him (only because the legal immigrant was a straight white male with a valid U.S. passport), and only intensified since 2018, when he was forced into his now intractable indigency.

41) Specifically, in his “Castrating young American boys?” email, see D:21, Father reported on 1/12/2018 about the substantiated **child-predatory transgressions** (that the activist “feminist” Harvard GAL and her ruthless associate committed in the Family Court, D:15) to the Respondent Gov. Maura Healey -- the Mass. Attorney General at the time. Father later summarized his email by reiterating:

“The [activist Harvard] GALs went on to lead the American Psychological Association and Pediatric Gender Program^{at} Yale [Medical School]. My forced indigency [caused by the State’s Marxist-inspired and agenda-driven discriminations and retaliations] started with my email: “Dr. Oleski, Is your ‘Pediatric Gender Program,’ in fact, in plain English, castrating young American boys? It is well known that the Nazis, as part of the emerging eugenics movement, started with castrating the hated ‘inferior’ minorities (for clarity, I grew up as a deeply hated minority in a ruthless dictatorship).

They moved on to gassing them in masses only after the population and the 'scientific community' did not complain or 'resist' them in any way."

- 42) In fact, Father has concisely substantiated that the fraudulently "maximized" federal reimbursement-collecting State violated his civil rights on purpose, and then retaliated against the whistleblower Father for complaining. Accordingly, Father's allegations against the State's child-predatory and profiteering agenda (for deliberately inducing forced "fatherlessness" in children) are supported by Father having absolutely no contact with his younger Siblings -- outside of the always-interfering & agenda-driven "supervised visitations" -- despite his prior **500+** supervised visits with his four children **without any raised complaints.**
- 43) The agenda-driven discriminations & targeted retaliations peaked on 1/30/2025 when the Family Court blindly continued endorsing the two Mothers' baseless and malicious parallel projections that Father has "had hidden assets," "lived in luxury -- without wanting to earn a living," etc., despite his in-person testimony of becoming homeless in just weeks. 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 also knew that Father (and his family) had legally emigrated from Romania and had no assets, money, property, etc., left behind in the communist tyranny. The Mothers were keenly aware that Father's entire net worth was unequivocally created when he

sold his “one-developer” software startup. Moreover, Father fully disclosed all his meticulously preserved finances during the discovery phase of his divorce.

44) Father is an experienced software engineer with a master's degree in computer science. He has worked all his life for his own software companies. Despite the direct Family Court orders for Father to flatly abandon his profession (only to seek the thus conveniently “silenced and enslaved” minimum-wage jobs), he has not stopped working full-time on now open-source (i.e., “free”) software⁷.

45) Father’s net worth at the time of his divorce from Mother-B was \$6,746,867.

On the same day, on 3/19/2008, Mother-B declared her net worth as \$6,815,717 in her financial statement filed with the Family Court. The couple’s combined net worth was derived from the 60/40 split of the proceeds from the sale, D:89, of Father’s startup in 2000 and the rewarding of Mother-B’s non-technical role.

46) After lying to the police/DCF on 4/28/2011, Mother-B filed a revised financial statement in 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 manifestly drastic \$4,251,296 change in just 3 years. She staged the **4 million dollar financial fraud** on purpose to support her sudden QAnon-style infantile false narrative, an attorney-assisted malicious fabrication, that attempted to recast Mother-B’s prior abandonment of her 3.5 yo non-biological Twins (solely for her selfish “liberty and riches”) into “a victimized American mother openly bullied by a millionaire Romanian

⁷ See <https://github.com/quantapix>.

immigrant suddenly 'fleeing the country' in fear." In fact, Father and Mother-B married on 12/10/2003. The Twins were born on 3/13/2004 through IVF and a gestational carrier. Father is the Twin's biological father, and Mother-B 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 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 from a thus "liberated" Mother-B.

- 47) The GAL investigation by Drs. Deutsch and Olezeski from Harvard concluded that "[Mother-B] either lacks affect or was bullied to abandon her twins" on 8/31/2011. Despite the revealed multi-million dollar financial fraud by Mother-B, the Family Court still did not endorse the two GALs' effective conclusion, i.e., a suddenly millionaire Mother-B is **"incapable of loving her non-biological children"** and refused to return the thus traumatized Twins' custody to Father.
- 48) Instead, the Family Court continued to discriminate based on sex by using the unauthorized "psychological testing" by Dr. Olezeski, an already hate-driven, sex-obsessed ("And in your private practice, what is the general client base? It's adult sex offenders"), and mere "activist" post-doc, with no license to practice psychology in Mass. and with no GAL expertise, D:15, -- especially compared to the 3 Harvard medical doctors/professors/therapists' joint conclusion, based on extensive tests, that Father **"presented no danger to his children,"** B:194.

49) The separated 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 and 6/4/2011, respectively. The couple never married, due to the ongoing litigations. Mother-B (without any college degrees) and Mother-C (with a college degree) did not get along. Mother-B threatened both Father and Mother-C with calling the police/DCF on them 16 times before her ultimatum in her 39-minute phone call to Father on 03/29/2011: "Attorney Foley will suck [Mother-C] dry and I will not pay a penny supporting that whore." Specifically, Mother-B reiterated her objective in her call to Father, i.e., to preempt Mother-C from getting her (that is, Mother-B's always strictly private/personal) money through the \$10,000 per month child supports 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 the 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 from Father in 2008.

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

51) Driven by the deliberate discriminations (including all 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.

52) Father was first ordered to pay any child support in June 2011, more than 14 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 Enforcement⁸ (“CSE”) program through the Mass. DOR CSS, D:357.

53) Pursuant to CSE rules, the thus forcedly indigent Father immediately sought modifications of his parallel child support (and expenses) orders. However, the

⁸ See <https://crsreports.congress.gov/product/pdf/RS/RS22380>.

Family Court continued to deliberately violate his constitutional rights by not allowing his parallel ~\$5,000/month combined support orders to be modified, despite his complete financial record (dating back to 2008) diligently e-filed.

54) Consequently, Father's in-arrears court-ordered obligations for his 4 children have reached **\$490,000+** combined, with an additional **\$59,082+** in interest and penalties levied on Father by the DOR CSS, D:180. While he has consistently complained in the Family Court about the allowed discrimination and agenda-driven retaliatory "reprogramming," the Family Court retaliated against Father by completely degrading his fatherly bonds. The Family Court's orders aimed to sustain the now manifested forced "fatherlessness" of his dear four children.

55) As substantiated motivation behind these targeted retaliations by (effectively) the State, Father has consistently argued in both state and federal courts that, "The State publicly seeks to 'maximize'⁹ federal reimbursements (despite the potential harm and injury to our dear children and taxpayers)... Competing against all other states, this can be accomplished only by (1) targeting the families with more resources, (2) maximizing each child support amount by forcefully and fully separating the children from their nonresident parents, (3) allowing the fabrications of 'high conflicts' into the cases to incentivize the 'feeder network' of colluding professionals,' (4) hiding the thus induced legal

⁹ "Federal receipts associated with the child support computer network shall be drawn down at the **highest possible rate** of reimbursement..." see <https://malegislature.gov/Budget/FY2022/FinalBudget> at 1201-0160.

struggles by the deliberately falsified Family Court dockets or records, and (5) concealing the wrongdoing from discovery and appeals (and federal penalty inducing corrections) with 'protective' [Civil RICO] racketeering schemes."

56) Subsequently, as forced indigency is intractable and the resulting controversy and induced judicial deadlock are significant, Father diligently (and correctly) identified the key elements of the child-predatory & profiteering agenda-driven **"Discrimination Scheme,"** i.e., "the act of an employer hiring Father, without also preemptively covering his now \$549,082+ of in-arrears obligations for his children, would immediately deny his ability to perform duties as an employee, as all his income needed for his own survival would be effectively garnished."

57) Consequently, after the parallel hearings on 1/30/2025 (when Father's shelter at 32 Hickory Cliff Rd. in Newton was torn down), the Family Court intensified the above Discrimination Scheme's second phase. As Father started receiving federal government aid on 3/14/2025, the parallel hearings scheduled for 4/28/2025 were canceled (only to preclude Father's in-person testimony and prevent him from impeaching the two Mothers' allowed deceptions). Specifically, he began receiving DTA/SNAP "food stamp" benefits, D:356, and food from two Newton Food Pantries on 3/14/2025. He also started sleeping in a small tent in Newton. The city's director of Health & Human Services later allowed Father to call the Bristol Lodge Men's Shelter in Waltham. She also prepaid a phone that Father could use to call the homeless shelter's "daily lottery" for their bed

availability. One bed became available on 4/1/2025, and Father was accepted to stay (exclusively during the nights) at the shelter. **Father has been sleeping at the homeless shelter every night since then.** Despite now crystalized/trivially verifiable facts of the matters, the Family Court continues to block, delay, deny, discard, and even outright erase Father's proper, timely, & lawful submissions.

58) Specifically, Father has substantiated the originating discriminations (and all the subsequent retaliations) based on his sex and national origin, as the Family Court has never "stolen" a mother's children from her during a mere *ex parte* hearing -- only because the legal immigrant also had a valid U.S. passport, i.e., "[Mother-B] initiated these matters in collusion with [Mother-C] of the parallel cases on or about 4/28/2011 in a staged 'coup' to preemptively wrestle the physical custody of children away from Father with a manifested intent to avoid paying child support. As [he] had been the physical custodian and full-time caretaker of his older twins for the prior 4 years, [the Family] Court discriminated against the legal immigrant (and naturalized US citizen) when [Father's] children were immediately separated from him during the 5/2/2011 *ex parte* hearing solely due to him having a passport. Following Father's consistent and immediate opposition to the discriminations, [the Family] Court initiated targeted retaliations against [Father] by deliberately discarding his subsequent submissions and outright erasing all his relevant facts ... Specifically, as actions have consequences, the four years that the

loving Father devoted to his 'abandoned by their mother' Twins is a material and significant gap in his professional record ... see his attached resume. The lack of [professional] continuity or [easy] contact (no phone until 3/28/2025) cannot be 'discreetly' withheld from Father's resume without lying to all the prospective employers about relevant details, even before a mere 'screening' interview. Consequently, Father has no choice but to have his prepared 'it's a discrimination matter currently in the courts' answer before 'why?' questions [for his **now 2,940+** submitted, always compliant job applications, D:358]."

- 59) Through Father's filed complaints for discrimination to EEOC/MCAD, D:35, and testimonies in Family Court on 1/30 & 7/21/2025, he consistently stated:
- (a) Father 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.
 - (b) In response to a letter from MCAD, Father reiterated that, as a consequence of the sustained and systemic direct targeting & retaliations, he had become **forcedly indigent** -- with no phone or any means of physical transportation.
 - (c) The completed (and now third) multi-state levy on Father's leftover financial accounts by the DOR CSS did not affect Father's still skyrocketing and now \$549,082+ of combined in-arrears child supports & court-ordered expenses.

- (d) As Father's voluntarily disclosed financial balance sheet lists an "available" \$0.71, he has requested the AGO to review his substantiated federal Civil RICO-based complaint pursuant to G.L.c. 271A, "enterprise crimes," D:181.
- (e) The State continues to deliberately discriminate and/or retaliate/interfere/aid & abet against Father by not just allowing but also endorsing the deliberately falsified Family Court dockets with "absolute judicial and/or prosecutorial immunity" deceptive justifications repeatedly filed in Superior Court, B:317.
- (f) The SJC ordered Father to "create a record" to substantiate all his claims of sustained/systemic disparate treatment by the retaliating State. He complied and assembled his SJC Record, C:5 & 50. In it, Father substantiated that the State relies on the agenda-driven Discrimination Scheme to conceal that the Family Court's deeply child-predatory "feminist" & profiteering "LGBTQ+" Marxist "equity-based" routine had knowingly allowed the two Mothers to lie on purpose in their filed financial statements & colluding trial testimonies about the **\$1,000,000** Father had paid Mother-B just **after** his divorce from her on 3/19/2008 as part of his proper & lawful divorce agreement endorsed by the Family Court. Building on the deliberate initial perjuries, sustained/systemic attorney-assisted subornation of perjuries on the Mothers followed.
- (g) Specifically, Mother-B's original \$1M lie fraudulently ballooned into a \$4M purpose-fabricated (for simultaneous deception) "material discrepancy" in Father's otherwise meticulously preserved finances, C:138. His SJC Record

documents that the Family Court allowed/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 induced existential crises:

“Do you contest a) my damages (as updated to the Court on 11/16/2025, see below), and b) the ‘Attorneys’ unverified allegations damage Father’ detailed estimate for the fraudulent/discriminatory \$1,265,112 ‘legal fees’ allowed in the predatory Family Court (see attached affidavit, on page 45, [I handed] to First Justice Monks on 12/17/2018, pages 14-17),” C:532.

- (h) Moreover, after the deliberately staged “emergency” *ex parte* hearing on 5/2/2011, Father immediately (and consistently) started complaining about the explicit disparate treatments by the Family Court. Facing the **973** malicious deceptions and errors -- that Father diligently documented in his **110-page** filed affidavit, even the 400 times GAL testified in Family Court that she had made “errors” in her outrageously inflated “Harvard investigation” -- billed at ~10 times more than the parallel non-Harvard GAL’s honest efforts.
- (i) Father has not claimed that the State had intentions to punish all Romanians. Instead, his claims are narrow, i.e., to conceal the previously allowed child-predatory and profiteering agenda-driven multi-million dollar perjuries and subornations of perjuries by the two Mothers, the State continues to commit G.L.c. 151B, § 9, “unlawful practices,” i.e., G.L.c. 151B, § 4 (4) retaliation,

- (4A) interference, and (5) aiding & abetting employment discrimination with the explicit & directly targeted purpose to a) **silence** Father's whistleblower voice and b) specifically **enslave** him to block his legal actions *ad infinitum*.
- (j) As targeted retaliations are themselves explicit discriminations (still based on sex and national origin) and the profiteering State continues to receive the mandated (but fraudulently "maximized") federal reimbursements based on Father's now \$549,082+ of combined in-arrears child-supports and court-ordered expenses, concealing the allowed (and actively encouraged) multi-million dollar initial perjuries & subornations of perjuries is crucial for the State in avoiding federal penalties. Consequently, the State refuses, even on 11/25/2025, B:282, to investigate discriminatory acts -- that are not trivial, or "cookie-cutter," anti-feminist and/or anti-LGBTQ+ discriminations -- even if the facts overwhelmingly substantiate the directly targeted & retaliatory acts against members of a "protected class" -- an always legal immigrant, B:317.
- (k) Accordingly, 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 Respondents continue to discard (only to erase) Father's consistently submitted **174+ complaints** (or desperate email messages to an assigned AGO representative), as mere "garbage," B:53-56.

- (l) Substantiating the child-predatory nature of the State's (Marxist-inspired) "discrimination schemes," Father has documented (e.g., on 1/10/2024) that his four dear 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," B:428.
- 60) Subsequently, Father attempted to request relief from the Mass. Appeals Court, informing (and substantiating) that the parallel Family Court dockets have been deliberately falsified by effectively discarding and erasing all of his individual (i.e., non-political identity-based) facts and evidence, C:260-321 and D:98-137.

REASONS FOR GRANTING THE WRIT

- 61) Marxist indoctrination builds on a governmental convenience called "equity."
- 62) The original concept is currently repurposed 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."¹⁰
- 63) This case is a well-preserved generalization of the controversy as 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

¹⁰ 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.

64) Therefore, Father has argued that mail fraud, falsified dockets, and concealing sabotaged appeals (by **discarding notices of appeals**, C:337,346) are acts not protected by "absolute judicial immunities," C:328, due to the Respondents' absence of appeal jurisdiction. He concluded in SJ-2024-M026 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 [ongoing] sabotaging of appeals was committed to obstruct justice (i.e., the reviewing of denials of motions for relief from judgments per 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."

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

66) Explicit focus on such "accepted" groups leads to the Russell's Paradox-like¹¹ phenomenon: Do those excluded from all enumerated "specially protected from others" groups have any remaining rights worth protecting? To bypass it (with

¹¹ See <https://plato.stanford.edu/entries/russell-paradox/>.

its “we can infer anything from a contradiction” consequence), any equity-based “social justice” has to reintroduce the Soviet “Gulag Archipelago”¹² to effectively deal with the thus unprotected masses having no “equity” left at all.

67) Despite the “progressive” concept-laundering attempts, all “specially protected from others” groupings continue to be mere, **ambiguous**, and **inconsistent**, *ad-hoc* artifacts based on conveniently “fluid” political identities. In Marxism, the ambiguity and inconsistency are (unsurprisingly) essential: “It’s on purpose! The laws are unclear for a reason. Because everybody is a criminal... 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.”¹³

68) 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.”

69) 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.

¹² See https://en.wikipedia.org/wiki/The_Gulag_Archipelago.

¹³ See “The Gulag: What We Know Now and Why It Matters,” <https://www.youtube.com/watch?v=37C9hofR6gg> at 1:19:11 to 1:21:10.

70) 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.”**

71) Therefore, the SJC’s inaction violates M.G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding & abetting employment discrimination. Moreover, the State’s manifestly discriminatory “guilty until proven innocent” Stalinist 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?”

72) Specifically, starting with Father’s first petition (SJ-2022-0041) on 1/31/2022 and ending with the SJC-13427 decision on 8/8/2023, C:108, the SJC applied **ambiguity** to deceive Father and “string him along,” i.e., order him to keep filing appeals and motions per Rule 60 (b)(6), while knowing that the secret 12/5/2013 “gatekeeper” order, B:193, would render his efforts null, D:327-355.

73) After Father’s testimony on 2/22/2024, i.e., “it is impossible to hide that I have been trying to file complaints... because of systemic Rule 60 fraud on the court. The Family Court, back in... [12/5/2013] falsified the record. They did not put the denial on the record. I was not able to appeal it, and when they put it on the record on [7/15/2014], it was already too late. None of the appeals could have

gone through... I stated that the suppressing evidence ruling [for the 'Offer of Proof,' B:194] first manifested itself on [12/5/2013]... as substantiated by the falsified dockets served by the [AGO] on me on [8/9/2021] and the 545-page-long documented circumstances... to the [SJC-13263, C:91] on [4/21/2022],” the Family Court **revealed the secret “gatekeeper” order only on 4/20/2024.**

- 74) Consequently, with the proof for the intent to discriminate ultimately revealed, Father summarized the following clear abuses of judicial discretions underlying the 2/13 & 6/30/2014 parallel judgments, as Family Court knowingly overruled
- 1) even the two “activist” Harvard GAL’s ultimate admission of factual errors,
 - 2) the three Harvard medical doctors/professors therapists’ joint conclusion that Father **“presented no danger to his children,”** 3) the countless attorneys’ now substantiated collusion to defraud the Court itself, 4) the easily verified record of Father’s and family’s political asylum in 1986, and 5) that the three Harvard Medical School doctors/professor therapists professionally wanted nothing to do with the Family Court’s deeply child-predatory agenda-driven profiteering.
- 75) While the forcedly indigent (and also utterly isolated, and ordered to an implied house arrest) Father struggled to create his SJC Record demanded by the SJC with the subsequent orders on 2/29, 5/31 and 9/26/2024, see B:03,09,64, and crystallized with the now 50+ state and federal court dockets, Father was given a strictly “homeless shelter/basic food” at 32 Hickory Cliff Rd. in Newton, just as he reported it to the AGO’s Criminal Bureau, Middlesex District Attorney,

and Newton Police on 1/13/2025. Father's "homeless shelter/basic food" lasted 85 months (at an estimated monthly cost of ~\$2,836) and ended on 2/12/2025, with the house finally torn down. Without that "private" shelter, Father could not have delivered his SJC Record on 2/10/2025 -- documenting a thus deeply child-predatory/profitteering agenda-driven discrimination/retaliation scheme.

76) Due to this "reverse discrimination" scheme, Father has been held GUILTY of contempt, i.e., "able to pay," continuously since 2/12/2018 until Family Court reverted his status to "NOT GUILTY," i.e., "not able to pay," on 2/26/2024 -- backdated to "as of 1/21/2022," D:117, following the 2/22/2024 dual hearings.

77) In summary, Father's SJC Record clearly manifests the irreconcilable conflict between the 12/6/2021 projection of "GUILTY" in the Family Court's DOR-monitored case vs. the finding of "NOT GUILTY" (backdated to 1/21/2022, but effectively 12/3/2021, as the hearing was continued) in the case without DOR interventions -- with no changes whatsoever in Father's circumstances.

78) Consequently, with the SJC Record, SJC was presented with the unavoidable corollary of the thus endorsed ambiguity: the Marxist-inspired **inconsistency**, i.e., "The doctrine of judicial estoppel, in its most generic form, prevents a party from asserting a position in one legal proceeding that directly contradicts a position taken by that same party in an earlier proceeding. The elements necessary for the application of judicial estoppel vary from jurisdiction to jurisdiction, but in general, it will apply only when the two positions are clearly

contradictory, and the first position has been accepted by a court. **This doctrine is designed to protect the integrity of the courts, not the litigants,**” E:34.

79) To solve the intractable inconsistency, pursuant to Ames v. Ohio Department of Youth Services, 605 U.S. __ (2025), the SJC could have intervened via DAR-30493, C:203, and appeal 2025-P-0855, B:01,136,317, as Father substantiated:

“Had ‘reverse discrimination’ been recognized by Massachusetts law, the precedent from Lopez v. Commonwealth, 463 Mass. 698, 703 (Mass. 2012), would have applied, as Father intentionally constructed his essentially identical discrimination claims against the State by following the pattern established by the ‘double protected’ Black and Hispanic police officers. As reverse discrimination has not been recognized by Massachusetts law, this intentional scheme, which silences and enslaves a majority for fraudulently ‘maximized’ federal reimbursements, also directs the AGO, the MCAD, the Superior Court, etc., to endlessly reject all of Father’s filed complaints [for discrimination], evidence, and even his comprehensive, uncontested facts.”

80) Counting on the Family Court to ultimately resolve the controversy (by forcing the two Mothers to either a) sign incriminating stipulations, or b) abandon the long-term, combined, and **now half-million dollar plus** Family Court-ordered in-arrears supports/expenses, D:295), the SJC refused to step in -- as any such intervention would have clearly established the discrepancy between federal vs. state interpretations of the original, “badly written” federal discrimination laws:

“As Marxist delusions collapse when the money runs out, the overwhelming objective of these agendas is to use badly written federal discrimination laws to deceitfully ‘protect’ fabricated victims while extorting [the] fraudulently ‘maximized’ federal funds. Correcting the discrimination laws (that directly target the **only ‘unprotected class’**: the straight white fathers and ‘useless’ legal immigrants) is the comprehensive solution to stop the endless stealing of federal funds by [Marxist] state governments themselves. Accordingly, my petition to [this] Supreme Court concisely generalizes all these ‘hijack [the federal discrimination] laws to conceal [all] fraud’ schemes,” D:286.

CONCLUSION

81) Accordingly, Father respectfully requests that this Court review, in its entirety, the record of these interrelated proceedings by granting the herein petition and affirming that the SJC’s openly manifested attempts to double protect, but only some -- while applying a Stalinist-inspired “absolute judicial and prosecutorial immunities apply” subversion, are unconstitutional acts devised to deliberately conceal the thus (obscenely lucrative) **organized conspiracy to discriminate, retaliate, and racketeer** with the herein elaborated “silence & enslave” scheme.

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

February 16, 2026,

Respectfully submitted,



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