

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

IMRE KIFOR,
Plaintiff-Appellant,

v.

THE COMMONWEALTH OF
MASSACHUSETTS, MIDDLESEX
PROBATE AND FAMILY COURT,
MASSACHUSETTS DEPARTMENT
OF REVENUE CHILD SUPPORT
ENFORCEMENT DIVISION, YALE
SCHOOL OF MEDICINE, THE
COUNSELING CENTER OF NEW
ENGLAND, and ATRIUS HEALTH,
INC.,
Defendants-Appellees.

CIVIL ACTION
No. 23-1008

**PLAINTIFF-APPELLANT’S AFFIDAVIT IN SUPPORT OF HIS
MOTION FOR STAY PENDING APPEAL**

The Plaintiff-Appellant, Imre Kifor (“Father”), respectfully states:

- 1) Father has two children with each, [REDACTED] (“Mother-B”) and [REDACTED] (“Mother-C”), from fully committed and non-overlapping relationships. The now substantiated fraud on the court, deliberate defamations, and stereotypical discriminations by the Defendants-Appellees, the **“Father is [barbaric] Romanian”** and **“rape was cost-effective”** activist fabrications, have tormented the children and predictably led to their full parental alienation.

- 2) Father has alleged that racketeering and conspiracy to silence and enslave him are behind these ongoing retaliatory actions. The defining claims have origins in the Defendant-Appellee, Middlesex Probate And Family Court (“Family Court”), allowing the two bitterly jealous and vindictive Mothers to collude to target Father with false complaints based on deeply child-predatory fraud, sustained existential defamations, and systemic, stereotypical discriminations.
- 3) The Defendants-Appellees' ongoing actions had resulted in Father’s depleted finances and his **forced indigency** that started on 2/12/2018 when the Family Court initiated a punitive crusade against Father in response to his efforts to seek modifications and relief. As Father had been alleging child-predatory “mental health” fraud, driven by discriminatory activism in the Family Court, Father was labeled “dangerous” and was silenced and sentenced to jail.
- 4) Rejecting the predictable consequences of allowed discriminatory activism, only to then actively conceal them, the Family Court refused to investigate Father’s claims of his, therefore, deliberately induced forced indigency.
- 5) Both the “lack of any money” and the “inability to earn it” components of Father’s forced indigency were repeatedly discounted by Family Court when continually denying or ignoring Father’s timely filed affidavits of indigency.
- 6) Father has been diligently moving the Family Court to review and correct errors in judicial proceedings, specifically the silencing **“gatekeeper orders.”**

- 7) The Family Court noted in the 6/30/2014 judgment, “On [12/5/2013], the Court (Donnelly, J.) denied Father's request to submit additional evidence. The Court provided the following rationale: I specifically find that the value of any evidence received from mental health treaters is outweighed by the prejudice which would be supposed by the Plaintiff in light of the Defendant's prior vigorous assertion of privilege and Plaintiff's inability to conduct discovery regarding such witness(es),” and later reiterated the restrictions “Father must obtain permission from the Court prior to filing and/or serving any pleadings on Mother or Mother's counsel” in the also fraud-based 6/13/2019 judgment.
- 8) However, the 12/5/2013 denial was not communicated to Father. And, as the hence falsified docket entries also prove, it was not entered on the Family Court’s docket until 7/15/2014, thus rendering the ever-crucial evidentiary restrictions unappealable. While Father repeatedly attempted to appeal the 6/13/2019 judgment, his efforts have been sabotaged by the Family Court.
- 9) In a series of petitions to the Mass. Supreme Judicial Court, Father has claimed that the judicial deadlock (purpose fabricated by the Family Court through the also allowed filing of endless and frivolous complaints for contempt) was an apparent “war of attrition” aimed at delaying any investigations and denying Father’s desperate requests for relief from his thus retaliatory forced indigency.

- 10) Father's petitions to the SJC have all been denied. Despite Father's repeatedly allowed indigency, thus acknowledging his existential crisis without any crimes committed, it was ordered, "it is difficult to discern what, specifically, [Father] is challenging" and "[he] had adequate alternative remedies available to him."
- 11) Yet, Father's properly requested reviews of the orders, specifically about his purposely induced forced indigency, have been deliberately sabotaged by the Family Court and, therefore, the Mass. Appeals Court never considered them.
- 12) All of Father's relevant evidence has been fully communicated and readily accessible as Father had e-filed his entire collection with the Appeals Court.
- 13) Therefore, the Family Court's capricious or never communicated "gatekeeper decisions" are the arbitrary, untraceable, and unappealable "backdoors" that allow the directly targeted discrimination and silencing retaliation to continue.
- 14) December 2017 was the last time the hence forcedly indigent Father could pay his ~\$5K monthly obligations ordered by the Family Court for his children. His in-arrears responsibilities have now reached \$320,000. According to the [Child Support Enforcement: Program Basics](#)¹, Father has been timely and properly attempting to modify the parallel Family Court judgments since January 2018.
- 15) During the 3/23/2023 hearing, the Family Court once again insisted that Father's objective with all the lawsuits had been to "reduce his child support

¹ <https://crsreports.congress.gov/product/pdf/RS/RS22380>

amounts,” demanding that Father agree to that falsity under oath. Father respectfully rejected the narrative and restated that he wanted **“to triple”** his support for his four children. Father is a trained, skilled, and hard-working professional, and without the sustained and systemic fraud deliberately unleashed upon him, Father would have no issues supporting his children.

- 16) The renewed bullying episode by the Family Court was identical to Father’s experience in Romania with the [Securitate](https://en.wikipedia.org/wiki/Securitate)² (the Secret Police). The Securitate’s practice was to fabricate a “crime” and then threaten its targets until they agreed to become informants. No defenses, arguments, or discussions were allowed, eerily similar to the Family Court’s secretive “gatekeeper orders.”
- 17) Father never gave in to the Securitate, despite being beaten and later isolated.
- 18) Contrary to the manifested trivialization by the Family Court, see the attached transcripts, the Secret Police in communist tyrannies did not formally arrest their targets. They came at night and operated just like the Family Court does by setting traps, resorting to informal house arrests, and using endless cruel psychological torture. And by leveraging their targets’ innocent loved ones.
- 19) This shared agenda was captured during the Family Court trial: **“But don’t you agree that he needs to accept his role in what happened to the children to understand how to change his behavior? [Activist] GAL: Yes, I do.”**

² <https://en.wikipedia.org/wiki/Securitate>

Discriminatory “Father Is Romanian” Projection

- 20) Father was the ideal candidate for this activist “reprogramming.” He was from Romania, and as per [Hillary Clinton](#)³: “‘The Government Has No Business’ In Abortion Decisions. **We are not Romania**,” and “I’ve been to countries where governments forced women to bear children like they used to do in Romania.”
- 21) The activist Harvard GALs fabricated a false narrative by delegitimizing Father’s own “good” mother, see the attached GAL report and Father's filed affidavit, and then setting their “experiment”’s goal by dogmatically mandating “supervised visits only, indefinitely, due to the history of punitive behaviors and data that suggest Mr. Kifor will not be amenable to mental health treatment.” As mere psychologists, i.e., without “first, do no harm” Hippocratic Oaths, the GALs were trained to invalidate and provoke their hapless subjects to such a massive degree that even the hallmarks of manic psychosis, e.g., “unusually strong expenditures of energy” would certainly appear, see attached.
- 22) Could a sadistic zoo keeper use federal assistance to endlessly poke and torture their frantic bleeding caged animals until their openly public collapse? Father, grown used to the communist “weaponized psychology,” never turned violent, avoided succumbing to depression, never became sick, and never gave up hope despite his deliberately induced and utterly paralyzing forced indigency.

³ https://www.huffpost.com/entry/hillary-clinton-abortion-debate_n_5808457de4b0180a36e92518

False "Rape Was Cost-Effective" Activist Narrative

- 23) The activist narrative, i.e., "Romanians forced women to bear children" and "we are not Romania," necessitated a sudden "I believe that he raped you. And yeah - I'm still afraid of him. It was 12 years of manipulation and lies," as well as "he did say that two kids with you was more cost-effective. He was really scared about rape" collusion between the warring Mothers, see attached.
- 24) In addition to the Family Court later confirming that there was no rape and also denying all of the demanded "\$163,399.76 of legal fees," the fact remains that Father had continued to offer complete assistance with abortions, and it was the Mothers who continued to reject even the idea of "not having the children."
- 25) Directly refuting the projected activist "mental health" agenda, Father spared no effort to seek comprehensive psychiatric evaluations. These confirmed that Father had "presented no danger to his children, and there was no indication of impairment of his fitness to parent" (see the attached psychiatric evaluations).
- 26) Moreover, the psychiatric tests also included the evaluations of Father's parents to refute the viciously invalidating projection by the activist GAL onto Father's "good" mother, who had never abandoned her children and who had retired in 2004 after working in the U.S. as a Harvard scientist for the prior 18 years.

Atty.: “I Am Completely Horrified By These People”

- 27) The four attorneys from Burns & Levinson estimated that going to trial against Dr. Deutsch, the “superstar” GAL, would cost Father ~\$1,000,000 in legal fees.
- 28) The activist GAL mandated 6 therapists to the case from her “feeder network” of psychologists who “took no insurance.” They cost Father another \$2,000/week combined only to stay in compliance with the Family Court’s orders.
- 29) When Father changed course and compiled his Full Affidavit Questioning Dr. Deutsch's [GAL] Report, his lone attorney soon emailed, “I am completely horrified by these people.” Predictably, the attorney could not take the pressure allowed in the Family Court, and just before the last trial day, she quit the case.
- 30) The attorneys had been colluding by filing frivolous complaints for contempt against Father to attempt to silence the protective parent from complaining to the children’s caretakers about the **systemic child abuse** allowed to continue in the name of the Family Court’s activist agenda. Ultimately the Family Court ordered in the 2/13/2014 judgment, “1. [Father] is NOT GUILTY of Contempt as filed in [Mother-C]’s Complaint for Contempt on March 22, 2013.”
- 31) The attorney informed that Father “feels counsel is not acting on his behalf but as a **trojan horse.**” On 11/25/2013, Father relinquished his attorney/client & therapist/patient privileges (see attached). The Family Court promptly issued the “gatekeeper orders” on 12/5/2013 to avoid any future appellate reviews.

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

33) The meticulously documented systemic child abuse and agenda-driven parental alienation were effectively concealed when the Family Court ignored Father's response motion, affidavit, and extensive exhibits on 2/3/2014 while stripping Father of his protective legal custody of his children. Predictably, this occurred just after the 12/5/2013 "gatekeeper orders" were issued by the Family Court.

Signed under the pains and penalties of perjury.

April 9, 2023

Respectfully submitted,

/s/ Imre Kifor

Imre Kifor, Pro Se



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I have no phone

I have no valid driver's license

I have to move to a homeless shelter

<https://femfas.net>

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Discriminatory “Father Is Romanian” Projection

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