

Imre Kifor  
Bristol Lodge Men's Shelter  
PO Box 541095  
Waltham, MA 02453  
*(forcibly indigent — only deliverable mailing address available to me)*  
[ikifor@gmail.com](mailto:ikifor@gmail.com)  
*(857) 340-8699 (by the federal Lifeline program)*  
I have no valid driver's license  
I sleep in a homeless shelter  
<https://quantapix.com> and <https://femfas.net>  
<https://github.com/quantapix> and <https://www.youtube.com/@Quantapix>

June 16, 2026

Andrea Joy Campbell  
Massachusetts Attorney General  
Office of the Attorney General (AGO) — **Civil Rights Division**  
One Ashburton Place  
Boston, MA 02108

**Re: Civil Rights Complaint against the Massachusetts Registry of Motor Vehicles (RMV) and the Middlesex Probate and Family Court — supplementing the Civil Rights Division complaint your Office responded to on March 9, 2026, and the Criminal Bureau inquiry (matter 1326784) closed February 26, 2026 — concerning a State-built, self-reinforcing trap that, through the categorical RMV rule "Residential address cannot be a PO Box," denies a homeless and forcibly indigent father any lawful identification, and therefore any employment, while the Family Court deliberately falsifies the dockets and refuses to recognize that my only residence is a PO Box**

Dear Attorney General Campbell and the Civil Rights Division:

1. I write to supplement the civil rights complaint your Civil Rights Division acknowledged/responded to on March 9, 2026 (Complaint #1328127), and the related Criminal Bureau inquiry your Office closed on February 26, 2026 (matter 1326784). A new and concrete act of the Commonwealth — committed today, June 16, 2026, by the Massachusetts Registry of Motor Vehicles — completes a closed loop that the Commonwealth itself built and that the Commonwealth alone can unlock. I report it under the pains and penalties of perjury, with verifiable State-generated exhibits attached.
2. **The triggering act (today).** This afternoon, June 16, 2026, at 2:37 PM, I attempted to update my address with the RMV through my official myRMV account at `atlas-myrmv.massdot.state.ma.us` so that I could renew my expired Massachusetts driver's license. I entered the only residential address I have — **PO BOX 541095, WALTHAM, MA 02453** — the Bristol Lodge Men's Shelter mailing address assigned to me as a homeless person. The RMV's own system refused it outright with the message: "**Please Change Your Address — Residential address cannot be a PO Box.**" (Exhibit A, `26-06-16.pdf`.) I have no other address to give. I am homeless. The shelter's PO Box is, as a matter of fact, my residence.

3. **What the refusal costs me — the closed loop.** This is not a paperwork inconvenience. It is the keystone of a self-reinforcing trap, every link of which is a documented act of the Commonwealth or its instrumentalities:
  - a) **To work any job, I must have a valid government ID.** My Massachusetts driver's license expired on January 10, 2020, and I have no other valid identification (Exhibit B, `01-Expired-IDs.pdf`). On March 25, 2026, even LinkedIn — the platform on which I have been seeking skilled employment — froze my account and conditioned its restoration on submitting "a government-issued ID" to "verify your identity" (Exhibit C, `26-03-25.pdf`). I am thus locked out of the labor market itself, not merely of a single employer.
  - b) **To obtain a valid ID, I must give the RMV a residential address that is not a PO Box.** That is what the RMV refused today (Exhibit A). Even if I had the approximately \$50 renewal fee in hand this minute, the RMV would still refuse me, because the only address I have is a PO Box.
  - c) **My only address is a PO Box because I am homeless.** I have resided continuously at the Bristol Lodge Men's Shelter since April 1, 2025; the shelter's case manager has verified in writing that PO Box 541095, Waltham, MA 02453 is the mailing address furnished to me "until [I] secure an alternative or leave the shelter" (Exhibit D, `25-05-30.pdf`). I cannot secure an alternative because I have no income. I have no income because I cannot get a job. I cannot get a job because I have no ID. I cannot get an ID because I have only a PO Box. The loop closes on itself.
4. **My effort is not the missing variable.** The record forecloses any suggestion that I am not trying. I have submitted more than 3,050 job applications since 2019, including 2,230-plus on Indeed, Monster, ZipRecruiter, and LinkedIn for skilled work, all meticulously documented and served weekly on the parties and on your Office's Deputy Chief Dirks and AAG Lucia (Exhibit E, `26-04-29.pdf`). Recruiters now initiate contact with me on the strength of demonstrable, publicly verifiable technical work — for example, a Jobot recruiter on June 7, 2026 (Exhibit F, `26-06-07.pdf`), and, on June 15, 2026, an approach routing me to a "Software Engineer, AI Safeguards" role at Anthropic (Exhibit G, `26-06-15.pdf`). As I wrote contemporaneously to the parties and your Office on June 7, 2026: "**Apparently, my only roadblock is having no cash to renew my IDs.**" (Exhibit F.) The skills, the diligence, and the demand all exist. The single artificial barrier the Commonwealth has erected — and refuses to lower — is identification.
5. **The categorical PO-Box rule is a civil rights violation, not a neutral formality.** A blanket rule that a "residential address cannot be a PO Box," applied without any accommodation, operates to deny identification — and therefore lawful employment, banking, and full participation in civic life — to precisely those Massachusetts residents who are homeless and have no street address to give. The rule's burden falls entirely and predictably on the indigent and the unhoused. Denial of the means of identification to a homeless person is a denial of access to the basic instrumentalities of life, and the Commonwealth may not condition those instrumentalities on a street address that homelessness makes impossible. Cf. *Boddie v. Connecticut*, 401 U.S. 371, 380–81 (1971) (the State may not foreclose access to fundamental processes on account of indigency); *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950) (the State must address persons at an address reasonably calculated to reach them — here, the very PO Box the Commonwealth refuses to recognize). I ask the Civil Rights Division to examine the RMV's categorical PO-Box rule for its

disparate and exclusionary effect on homeless Massachusetts residents, so that no homeless resident is locked out of identification, and thus out of work, by the bare fact of having no street address.

6. **The RMV's own purported accommodation is illusory for the homeless.** I anticipate the response that the RMV offers an "Alternative Residency Affidavit" (RMV form LIC111\_0218, published at <https://www.mass.gov/doc/alternative-residency-affidavit-0/download>; Exhibit L) for applicants who cannot prove Massachusetts residency through the standard documents. That accommodation does not cure my situation — and the reasons appear on the form's own face:
  - a) **The affidavit reproduces the very bar that traps me.** Its "Residential Address" field carries the verbatim instruction: **"Must be a street address. PO Box, business or commercial addresses are not acceptable."** (Exhibit L.) The accommodation the Commonwealth points to thus repeats, word for word, the categorical exclusion at issue, and demands precisely the street address that homelessness denies me.
  - b) **The published affidavit does not even reach a homeless adult.** By its own terms, the form is **"For use by Individual Applicants under age 18,"** and it requires a **Parent/Guardian** to appear and certify while holding **"a Massachusetts License/ID showing [the] same residential address as the applicant"** (Exhibit L). I am sixty-four years old. I have no parent or guardian, and no co-resident who holds a Massachusetts ID at my address. The form supplies no path whatsoever for an unhoused adult.
  - c) **And in any event, I have no usable street address to supply.** The only street address associated with the Bristol Lodge Men's Shelter is **27 Lexington St., Waltham, MA 02453** — the address on the shelter's own letterhead (Exhibit D). That building is a municipal **Fire Station**. It contains no apartments and no residential units, and is fully occupied by its firefighting function and by the roughly fifty homeless men the shelter serves nightly. The shelter's verification letter and its administrator **expressly instruct that 27 Lexington St. is not to be used as a residential or mailing address** — the shelter cannot serve mail or process residency for ~50 men there — and direct that **PO Box 541095** be used instead (Exhibit D). I have no legal right to claim the fire station as my residence; it is already fully taken by its actual use.
  - d) The result is a closed door. The standard residency documents I cannot produce; the published affidavit bars my only address verbatim and, by its own title, does not apply to me; and the lone street address in the vicinity is a fire station I may not claim. For a homeless resident in my position, "Residential address cannot be a PO Box" is an absolute exclusion with no lawful path around it (Exhibit A). The only cure is for the RMV to accept the verified shelter PO Box as both my residential and my mailing address.
7. **The root cause: the Family Court's deliberate docket falsification and its refusal to recognize that my residence is a PO Box.** The RMV's refusal is the latest link, but it is not the source. I am homeless and forcedly indigent because the Middlesex Probate and Family Court has, for years and continuing today, deliberately falsified its dockets, erased my record submissions, and sabotaged my timely appeals — the very conduct already before your Civil Rights Division and Criminal Bureau. Critically for this complaint, the same Family Court **stubbornly refuses to recognize that my residence is, in fact, a PO Box**, and so cannot be cured by ordinary means:

- a) On June 11, 2026, yet another Family Court Registry mailing — hand-addressed by the Registry to the **demolished structure at** [demolished house mailbox] (a house torn down on or about 2/12/2025; only a mailbox remained) — was returned to sender, marked in handwriting "**Person doesn't live at this address.**" A Good-Samaritan resident, [REDACTED], had to walk it to the post office because the Registry persists in addressing me where the Commonwealth's own records show no person could have lived (Exhibit H, `26-06-11.pdf`).
  - b) This is not isolated. As I reported under 28 U.S.C. § 1746 to the United States Court of Appeals for the First Circuit on June 12, 2026 (No. 26-1346), the Registry's continued mailings to a demolished structure, together with its same-day reversals of its own e-filing rules, are part of the active concealment of the falsified parallel dockets (Exhibit I, `26-06-12.pdf`).
  - c) On June 13, 2026, I e-filed and served, in parallel on all three Family Court dockets ([REDACTED]; [REDACTED]; [REDACTED]), an Omnibus Motion to Perfect the Parallel Appeals that asks the Family Court, among other relief, to **direct the Registry under Mass. R. Dom. Rel. P. 60(a) to send all orders and notices solely to my Bristol Lodge PO Box** (Exhibit J, `26-06-13.pdf`). The Family Court has not honored that request. It will not even mail to the address from which I file.
  - d) I have made the same plea repeatedly and in writing to the Appeals Court (Exhibit K, `26-05-21.pdf`) and directly to the Family Court Register (Exhibit J). The Commonwealth's courts will neither correct the falsified record nor accept the only address at which I can be reached.
8. **Why this is one civil rights matter, not two.** The RMV will not let me out of homelessness (no ID, no job, no income), and the Family Court will neither end the fraud that caused the homelessness nor even acknowledge the address that homelessness forced upon me. The Commonwealth has, in effect, made my homelessness both the cause and the proof of my disqualification: it refuses my PO Box at the RMV because homelessness gave me a PO Box, and it refuses to fix homelessness at the Family Court because it will not recognize that PO Box as my residence. This is the "deepening circus" your Office has now seen documented across four months — and it is, at its core, the targeting of a straight white legal immigrant father with disparate treatment the Supreme Court squarely condemned in *Ames v. Ohio Department of Youth Services*, 605 U.S. \_\_\_ (2025).
9. **Relief requested.** I respectfully ask the Civil Rights Division to:
- a) **Investigate and intervene** as to the RMV's categorical "Residential address cannot be a PO Box" rule — including the demonstrated insufficiency of the Alternative Residency Affidavit for a homeless applicant who has no usable street address — and direct that the RMV accept a verified homeless-shelter PO-Box address as both the residential and the mailing address for license issuance and renewal, so that no homeless Massachusetts resident is foreclosed from identification — and therefore from lawful employment — by the bare fact of having no street address;
  - b) **Direct or request the RMV** to process my own address change and license renewal using my verified Bristol Lodge address (PO Box 541095, Waltham, MA 02453), the shelter verification for which is attached (Exhibit D);

- c) **Re-open and act upon** the Civil Rights Division complaint received March 9, 2026, and the Criminal Bureau matter closed February 26, 2026, in light of the continuing acts documented here — including the Family Court Registry's June 11, 2026, mailing to a demolished structure and its refusal to honor my Rule 60(a) request to mail to my PO Box; and
  - d) Take any further action the Civil Rights Division deems warranted to end the self-reinforcing State-built trap described above.
10. I declare under the pains and penalties of perjury that the foregoing is true and correct to the best of my knowledge, and that every exhibit referenced is a true and accurate copy of a document generated by the Commonwealth, by the Bristol Lodge Men's Shelter, or in the ordinary course of my own correspondence.

Respectfully submitted,

/s/ Imre Kifor  
Imre Kifor, Pro Se  
June 16, 2026

## Exhibit Index

Ex.	File	Date	Description
A	26-06-16.pdf	6/16/2026	myRMV screen capture: address-change rejection — <b>"Residential address cannot be a PO Box"</b> — entered residence PO BOX 541095, Waltham, MA 02453
B	01-Expired-IDs.pdf	exp. 1/10/2020	Expired Massachusetts driver's license / identification
C	26-03-25.pdf	3/25/2026	LinkedIn account restriction requiring a government-issued ID to restore access
D	25-05-30.pdf	5/30/2025	Bristol Lodge Men's Shelter verification; continuous residence since 4/1/2025; letterhead street address 27 Lexington St. (a Fire Station, no residential units); PO Box 541095 directed as the only usable residential/mailling address
E	26-04-29.pdf	4/29/2026	Weekly job-application reports (3,050+ since 2019; 2,230+ skilled), served on the parties and AGO
F	26-06-07.pdf	6/7/2026	Jobot recruiter contact; contemporaneous statement: "my only roadblock is having no cash to renew my IDs"
G	26-06-15.pdf	6/15/2026	Recruiter approach routing to "Software Engineer, AI Safeguards" at Anthropic
H	26-06-11.pdf	6/11/2026	Family Court Registry mailing to the demolished 32 Hickory Cliff Rd. structure, returned "Person doesn't live at this address"
I	26-06-12.pdf	6/12/2026	USCA1 No. 26-1346 Status Affidavit (§ 1746) on continued concealment of the falsified parallel dockets
J	26-06-13.pdf	6/13/2026	Parallel Omnibus Motion to Perfect the Appeals — incl. Rule 60(a) request to direct the Registry to mail solely to the PO Box

<b>Ex.</b>	<b>File</b>	<b>Date</b>	<b>Description</b>
K	26-05-21.pdf	5/21/2026	Letter to the Appeals Court (CJ Blake) on the erased record and undeliverable Registry mailings
L	Alternative-Residency-Affidavit.pdf	RMV form LIC111_0218	RMV "Alternative Residency Affidavit" — Residential Address field requires a street address ("PO Box, business or commercial addresses are not acceptable"); scoped on its face to "Individual Applicants under age 18" with a co-residing Parent/Guardian holding a MA License/ID