

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

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<p>IMRE KIFOR, Plaintiff, v. THE COMMONWEALTH OF MASSACHUSETTS, THE MASSACHUSETTS SUPREME JUDICIAL COURT, and CHIEF JUSTICE KIMBERLY S. BUDD (official capacity, Massachusetts Supreme Judicial Court), Defendants.</p>	<p>No: _____ JURY DEMANDED</p>
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**IMRE KIFOR'S COMPLAINT FOR DEPRIVATION OF CIVIL RIGHTS
AND CONSPIRACY TO DEPRIVE CIVIL RIGHTS**

(42 U.S.C. §§ 1981, 1983, 1985)

**AGAINST THE COMMONWEALTH OF MASSACHUSETTS,
THE MASSACHUSETTS SUPREME JUDICIAL COURT,
AND THE CHIEF JUSTICE OF THE MASSACHUSETTS
SUPREME JUDICIAL COURT IN OFFICIAL CAPACITY**

The Plaintiff, Imre Kifor ("Father"), respectfully states as follows:

INTRODUCTION

- 1) This is a complaint for deprivation of civil rights and conspiracy to deprive civil rights under 42 U.S.C. §§ 1981, 1983, and 1985 against the Commonwealth of Massachusetts (the "State"), the Massachusetts Supreme Judicial Court ("SJC"), and Chief Justice Kimberly S. Budd (in official capacity) (together, "Defendants"). Despite Father's years of diligently substantiated petitions presenting uncontested evidence of systematic discrimination, falsified court records, discarded pleadings, and organized obstruction of justice in the Massachusetts state courts, the SJC has repeatedly and summarily denied Father meaningful judicial review — in direct violation of the Due Process and Equal Protection Clauses of the Fourteenth Amendment and the First Amendment's right to petition the government for redress of grievances. The SJC's sustained pattern of denial, combined with overt acts of concealment, misrepresentation, and obstruction by the State's own agents, constitutes a conspiracy within the meaning of 42 U.S.C. § 1985(3).
- 2) Since January 31, 2022, Father has filed a sustained and diligently documented record ("SJC Record") with the SJC, substantiating that the Massachusetts Probate and Family Court has engaged in a systemic, agenda-driven scheme to discriminate against Father based on

his race, color, sex, national origin, and status as a majority-group parent — while the SJC has knowingly allowed this scheme to continue by refusing to engage with the substantiated evidence Father has placed before it.

- 3) Most recently, on September 5, 2025, the SJC issued its order in SJ-2025-M006, effectively denying Father's petition without addressing the comprehensive, uncontested factual record Father had assembled at the SJC's own express direction. On September 19, 2025, the SJC further denied Father's Application for Direct Appellate Review, DAR-30493, again without engaging with the substance of Father's substantiated claims. These denials, taken in context of the SJC's sustained pattern of refusing to address Father's petitions, constitute independent violations of Father's federal constitutional rights actionable under 42 U.S.C. § 1983.

PARTIES

- 4) Father, Imre Kifor, is a naturalized U.S. citizen, sheltering at [demolished house mailbox] (mailbox only, house torn down), Newton, MA 02464. Father may be reached at ikifor@gmail.com and (857) 340-8699 (by the federal Lifeline program). Father is a trained professional and mathematician appearing *pro se* and *in forma pauperis*. Father has never been a government employee and has never been a prisoner.
- 5) Defendant the Commonwealth of Massachusetts (the "State") is a sovereign state of the United States, represented by the Office of the Attorney General at One Ashburton Place, Boston, MA 02108, and by Governor Maura Healey at the Massachusetts State House, 24 Beacon St., Boston, MA 02133. The State is liable herein to the extent that Congress has abrogated Eleventh Amendment immunity pursuant to 42 U.S.C. §§ 1981 and 1983, and/or to the extent sovereign immunity has been waived by the State's own conduct.
- 6) Defendant the Massachusetts Supreme Judicial Court ("SJC") is the highest court of the Commonwealth of Massachusetts, located at the John Adams Courthouse, One Pemberton Square, Boston, MA 02108. The SJC is an arm of the State exercising judicial and supervisory authority over all Massachusetts courts, including the Probate and Family Court. All acts and omissions of the SJC alleged herein were committed under color and pretense of state law.
- 7) Defendant Chief Justice Kimberly S. Budd is the Chief Justice of the Massachusetts Supreme Judicial Court, sued herein exclusively in her official capacity, at the John Adams Courthouse, One Pemberton Square, Boston, MA 02108. As Chief Justice, she bears supervisory and administrative responsibility for the SJC's handling of petitions and the SJC's compliance with federal constitutional mandates. Suit against Chief Justice Budd in her official capacity for prospective injunctive and declaratory relief is authorized under *Ex parte Young*, 209 U.S. 123 (1908).

- 8) Each and all of the acts and omissions alleged herein were committed by Defendants and/or their officers, agents, and employees, under color and pretense of the statutes, rules, regulations, customs, and usages of the Commonwealth of Massachusetts.

JURISDICTION

- 9) This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1343, because this action arises under the Constitution and laws of the United States — specifically the First and Fourteenth Amendments to the U.S. Constitution and 42 U.S.C. §§ 1981, 1983, and 1985.
- 10) This Court has authority to grant declaratory relief pursuant to 28 U.S.C. §§ 2201 and 2202, and to grant injunctive relief pursuant to Fed. R. Civ. P. 65.
- 11) This Court has personal jurisdiction over Defendants because they reside in, conduct business in, and committed the acts and omissions giving rise to this complaint in this judicial district.
- 12) Father notes that the present complaint challenges the SJC's independent constitutional violations — its sustained refusal to provide meaningful judicial review — and does not seek review or reversal of any specific state court judgment. Accordingly, the Rooker-Feldman doctrine presents no jurisdictional bar.

VENUE

- 13) Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) because Defendants reside and conduct business in this district, and because a substantial part of the events and omissions giving rise to Father's claims occurred in this district.

EXHAUSTION OF STATE REMEDIES

- 14) Father has exhausted his available state remedies. Since January 31, 2022, Father has filed no fewer than twelve petitions and applications with the SJC (SJ-2022-0041, SJC-13263, SJ-2022-0193, SJC-13310, SJ-2022-0271, SJC-13339, SJ-2022-0380, SJ-2022-0407, SJ-2023-0028, SJC-13392, SJ-2023-0122, SJC-13427, SJ-2023-M014, SJ-2024-M008/10, SJ-2024-M026, SJ-2025-M006, and DAR-30493), every one of which has been summarily denied.
- 15) Father has further petitioned the United States Supreme Court five times (Nos. 22-7115, 23-5932, 23-6398, 24-7282, and 25-6878, docketed February 23, 2026). Father's fifth petition (No. 25-6878) remains pending before the Supreme Court as of the date of this filing.
- 16) Father's pending Massachusetts Appeals Court case, No. [REDACTED] remains ongoing, further confirming that no adequate and complete state remedy exists or has been provided.

FACTUAL ALLEGATIONS

A. Background: The Underlying Discrimination Scheme

- 17) Since at least 2013, Father has been the direct and long-term target of a sustained and systemic scheme of "reverse discrimination" operated by the Massachusetts Probate and Family Court (the "Family Court") and the Commonwealth's agencies. This scheme — driven by a manifestly profiteering "LGBTQ+" and "feminist" political agenda — has deprived Father of: (a) the physical custody of his four children, despite years of full-time fathering and three Harvard Medical School therapists' professional conclusions that Father "presents no danger to his children" and there is "no indication of impairment of Father's fitness to parent"; (b) child support owed to Father; (c) professional and economic livelihood, through more than 3,000 diligently submitted job applications since 2019, all effectively blocked due to the State's targeted retaliation; and (d) housing, forcing Father into a homeless shelter.
- 18) The Family Court achieved this scheme through: (a) mail fraud and falsified dockets; (b) secret "gatekeeper" orders — most critically, the concealed December 5, 2013 order signed by Justice Edward F. Donnelly Jr., revealed only on April 20, 2024 — which barred Father's mental health treater evidence on the fabricated ground of "prejudice to Mother," a rationale directly refuted by signed health disclosure authorizations Father executed on June 12, 2012; (c) systematic discarding of Father's pleadings and erasure of 437 now-uncontested facts from the record on no fewer than sixteen separate occasions; (d) endorsement of fabricated and perjured claims by the two Mothers; and (e) use of out-of-state counseling services (CCNE/Lifestance and Atrius Health) to effect extreme parental alienation — widely recognized as emotional child abuse — against Father's four children. (Exhibits 28-4, 28-5, 28-6, 28-7.)
- 19) On February 26, 2024, the Family Court entered a "NOT GUILTY" reversal regarding Father's non-payment of child support, confirming the prior invidious and maliciously baseless nature of the contempt proceedings against him. On May 31, 2024, the SJC itself confirmed the existence of mail fraud, falsified dockets, and repeatedly sabotaged direct appeals in Father's case (SJ-2024-M008/10).

B. The SJC's Gatekeeper Filing Restriction and Direction to Father

- 20) On August 8, 2023, the SJC — in an order signed by all seven justices of the court — denied Father's fifth petition (SJC-13427) and simultaneously imposed a "gatekeeper" filing restriction on Father. The SJC's August 8, 2023 order required that any future petition by Father be accompanied by a motion for leave to file, together with a record demonstrating that Father had "no adequate remedy" and that substantiated his claims. This restriction was itself a form of unequal treatment: Father was singled out and subjected to a categorical pre-filing barrier not applied to other similarly situated petitioners. (Ex. 28-2.)

- 21) On September 26, 2024, following Father's repeated petitions, the SJC ordered in SJ-2024-M026 — in an order signed by all seven justices of the SJC, including Chief Justice Kimberly S. Budd — that: "The court will grant leave [for docketing Father's petition] if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim." Father accepted this direction and complied fully and diligently. (Ex. 28-2.)
- 22) In response to the SJC's September 26, 2024 order, Father assembled and filed the comprehensive "SJC Record" — docketed as SJ-2024-M026 and SJ-2025-M006 — constituting hundreds of pages of immediately verifiable, plain evidence, including: (a) proof that Family Court pleadings are routinely discarded by case managers; (b) proof that 437 now-uncontested facts have been verifiably erased from the dockets; (c) the secret December 5, 2013 "gatekeeper" order revealed on April 20, 2024; (d) the Family Court's finding of "no facts" (May 8, 2025); (e) the three Harvard Medical School therapists' professional evaluations; and (f) documentation of multi-million-dollar attorney-assisted subornation of perjury by the Mothers.
- 23) Father further demonstrated to the SJC that he has no other adequate remedy. The Massachusetts Attorney General's Office, the Massachusetts Commission Against Discrimination ("MCAD"), and the Middlesex Superior Court have each systematically dismissed Father's complaints — citing the State's own "absolute judicial immunity" defense — while the State has simultaneously maintained the fraudulent status quo of falsified dockets and erased facts.

C. The SJC's September 5, 2025 Order (SJ-2025-M006)

- 24) On September 5, 2025, the SJC issued its order in SJ-2025-M006. Despite Father's comprehensive, multi-hundred-page record of immediately verifiable uncontested evidence — assembled in express compliance with the SJC's own September 26, 2024 directive — the SJC summarily denied Father's petition without addressing, engaging with, or even acknowledging the substantiated factual record Father had provided.
- 25) The SJC's September 5, 2025 order did not: (a) identify any specific deficiency in Father's substantiated record; (b) address the confirmed mail fraud, falsified dockets, or the 437 erased uncontested facts; (c) address the revealed secret gatekeeper order; (d) address the Harvard therapists' professional conclusions; or (e) provide any meaningful reasoning for the denial. The order constitutes a denial of Father's substantiated petition in form only — not in substance.

D. The SJC's September 19, 2025 Denial of DAR (DAR-30493)

- 26) On September 19, 2025, the SJC denied Father's Application for Direct Appellate Review, DAR-30493, in the pending Massachusetts Appeals Court case No. [REDACTED]. The SJC issued this denial without engaging with the substance of Father's substantiated

claims or the overwhelming record demonstrating systemic discrimination, falsified dockets, and obstruction of justice.

- 27) The denial of DAR-30493, together with the September 5, 2025 order, confirms the SJC's sustained pattern and practice of refusing to provide meaningful judicial review of Father's substantiated civil rights claims — regardless of the volume, quality, or un rebutted nature of the evidence Father presents.

E. The SJC's Sustained Pattern of Denial Without Meaningful Review

- 28) The SJC's September 5 and September 19, 2025 orders are not isolated incidents. Since January 31, 2022, the SJC has denied every single petition Father has filed — more than twelve petitions and applications — without ever substantively engaging with Father's documented, uncontested evidence of discrimination, falsified records, discarded pleadings, and organized obstruction of justice.
- 29) The SJC's pattern of categorical denial without meaningful review mirrors — and reinforces — the broader "reverse discrimination" scheme that Father has documented in the state courts. Just as the Family Court routinely discards Father's pleadings and erases uncontested facts from the dockets, the SJC routinely denies Father's petitions without engaging with the substance of his claims. This pattern of behavior, sustained over four years of documented petitioning, cannot be explained as mere coincidence or legitimate judicial discretion.
- 30) The SJC's sustained refusal to provide meaningful review of Father's petitions constitutes: (a) denial of Father's right of access to the courts; (b) denial of due process of law; (c) denial of equal protection of the laws; and (d) denial of Father's First Amendment right to petition the government for redress of grievances.
- 31) Father notes, for context, that as of June 5, 2025, the United States Supreme Court invalidated the so-called "background circumstances" rule for majority-group Title VII plaintiffs, holding in *Ames v. Ohio Department of Youth Services*, 605 U.S. __ (2025), that courts must evaluate claims brought by majority-group plaintiffs under the same evidentiary framework as minority-group plaintiffs. The SJC's sustained pattern of denying Father's petitions is entirely consistent with — and has been enabled by — the now-invalidated discriminatory "background circumstances" rule that placed an additional burden on majority-group plaintiffs such as Father.

F. The Federal Court's March 25, 2026 Order and the Conspiracy's Reach

- 32) On March 25, 2026, United States District Judge Angel Kelley dismissed Father's First Amended Class Action Complaint in Civil Action No. 1:25-cv-11831-AK — the seventh federal case arising from the same underlying events — on the ground of *res judicata*, holding that Father's claims had been adjudicated in prior federal actions. Simultaneously, the Court denied Father's emergency injunction, denied Father's motions

to amend as moot, and ordered Father to show cause within 21 days why a filing injunction should not issue. (Ex. 28-1.)

- 33) Father respectfully submits that the March 25, 2026 dismissal is itself infected by the conspiracy alleged herein. Every prior federal judgment invoked as a *res judicata* predicate was entered before April 20, 2024 — the date on which the secret December 5, 2013 "gatekeeper" order was first revealed to Father. No prior judgment could have adjudicated claims that Father was constitutionally and legally barred from discovering. A judgment obtained or sustained on the basis of fraudulently concealed evidence cannot serve as a legitimate *res judicata* predicate. *See Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944) (fraud on the court vitiates prior judgments). Accordingly, the dismissal perpetuates, rather than corrects, the constitutional injuries alleged herein. (Ex. 28, Father's Rule 59(e)/60(b)(6) Motion to Alter, filed March 27, 2026.)
- 34) Father also notes that on November 25, 2025, the Commonwealth's counsel filed a brief in the Massachusetts Appeals Court, No. [REDACTED] that deliberately misrepresented material facts central to Father's civil rights claims — characterizing the 437 uncontested, Rule 36-admitted facts as "scant" and describing the secret gatekeeper orders as "undefined" — in a calculated effort to obstruct appellate review of the fabricated orders. (Ex. 28-5.)
- 35) Further, in early 2026, Father's LinkedIn professional account — his primary remaining channel for employment outreach — was terminated without cause or notice. Father submits that this termination, following upon the SJC's sustained suppression of Father's petitions and the State's targeting of Father's livelihood, constitutes further evidence of the coordinated campaign to silence Father and render him permanently unemployable and unable to pursue his legal rights. (Ex. 28-9.)

G. The Secret December 5, 2013 Gatekeeper Order: Fabricated Rationale and Documentary Refutation

- 36) On December 5, 2013, Justice Edward F. Donnelly Jr. of the Massachusetts Probate and Family Court entered a secret "gatekeeper" order in Father's Family Court proceedings. The order stated, in pertinent part, that Father's request to submit evidence from his mental health treaters was denied, on the ground that allowing such evidence would cause undue "prejudice" to Mother. The order was not docketed, was not served on Father, and was deliberately concealed from Father's record for over ten years. Father also submitted an "Offer of Proof" on November 25, 2013 in anticipation of the evidentiary hearing; that submission was similarly discarded and kept off the docket. Father did not learn of the order's existence until April 20, 2024. (Ex. 28-4.)
- 37) The "prejudice to Mother" rationale stated in the December 5, 2013 gatekeeper order was fabricated. On June 12, 2012 — more than eighteen months before the gatekeeper order

was entered — Father signed complete health information authorization forms for each of his three Harvard Medical School therapists: Dr. Harrison, Dr. Goldblatt, and Dr. Harold J. Bursztajn. These signed authorizations, documented in contemporaneous email chains transmitted on June 12, 2012, expressly authorized full disclosure of Father's mental health treatment records. They demonstrate that Father concealed nothing, that Mother had full access to any information she might have sought, and that there was no legitimate factual basis for a finding of "prejudice." (Ex. 28-6.)

- 38) The fabricated nature of the gatekeeper order's "prejudice" rationale has been confirmed by the Family Court's own 2026 proceedings. Pursuant to a court-ordered stipulation for the February 10, 2026 pretrial conference — which Father signed and Mother declined to contest — Mother left all 437 of Father's Rule 36 requests for admission unanswered. Under Massachusetts Rule of Civil Procedure 36, all 437 facts are therefore deemed admitted, including Father's assertion that the "prejudice" claim in the December 5, 2013 gatekeeper order was "fabricated." The presiding judge at the February 10, 2026 conference confirmed that Father's submissions were "uncontested and unopposed," and that Mother's representative, Attorney [REDACTED], had "persistently failed and refused to contest, oppose, or respond." (Exs. 28-4, 28-7.)
- 39) Notwithstanding the confirmed fabrication of the gatekeeper order's stated rationale, Father's February 11 and 12, 2026 motions for relief from the gatekeeper order pursuant to Massachusetts Rule of Civil Procedure 60(b)(6) — which set forth the documentary evidence of fraud in full — were denied on February 25, 2026 by Justice [REDACTED], without any hearing and with a notation of "WOF" (Without Finding). This denial, without engagement with the uncontested, documentary evidence of fraud, is itself an independent act of constitutional violation and an overt act in furtherance of the conspiracy alleged herein. (Ex. 28-4.)
- 40) The Family Court's pattern of erasing Father's factual record is extensive and systematic. Over the period 2013 through 2025, on no fewer than sixteen separate occasions, Family Court case managers truncated Father's 77-page admissions document — containing all 437 uncontested facts — to two meaningless pages, erasing all 437 facts from the docket. The Commonwealth's own November 25, 2025 brief acknowledges the admissions document exists but characterizes the 437 uncontested facts as "scant" evidence and mischaracterizes the gatekeeper orders as "undefined" — a characterization that is demonstrably false in light of the documentary record. (Ex. 28-5.)
- 41) Father further avers that Attorney Erin Harris, who served as Father's attorney up to the time the December 5, 2013 gatekeeper order was entered, was coerced and manipulated by opposing counsel Gail Otis into acting against Father's interests — effectively functioning as a "Trojan horse" within Father's own representation. Attorney Harris possessed the June 12, 2012 signed health authorizations and therefore knew that the "prejudice" rationale was factually false, yet took no action to prevent/challenge the

gatekeeper order or to place the authorizations in the record. The coordinated conduct of opposing counsel, and the failure of Father's own attorney to protect his interests, further evidences the organized nature of the conspiracy alleged herein. (Ex. 28-6.)

H. The Family Court's Continued Obstruction in 2025 and 2026

- 42) In 2025 and 2026, the Massachusetts Probate and Family Court has continued to obstruct Father's access to appellate and federal judicial review through a series of procedurally irregular and constitutionally unauthorized acts — each of which constitutes an independent overt act in furtherance of the conspiracy alleged herein. (Exs. 28-7, 28-8.)
- 43) On July 21, 2025, at a Family Court hearing, Father was verbally ordered — outside any written order and without any basis in the Massachusetts Rules of Civil Procedure or any standing court rule — to obtain the signatures of both mothers before docketing his Rule 36 admissions. This extra-judicial verbal requirement, which is unappealable because it was never reduced to writing, effectively blocked Father from placing 437 uncontested, Rule 36-admitted facts into the permanent docket. No rule authorizes a court to condition the docketing of admissions on consent signatures from opposing parties. (Ex. 28-8.)
- 44) On March 6, 2026, the Family Court rejected Father's notices of direct appeal, returning them with the notation "Notice of appeal cannot be e-filed." This rejection was procedurally improper: Father had properly filed direct appeal notices by e-filing, consistent with the Family Court's own established practices. The rejection prevented Father's three pending direct appeals from being docketed and initiated, and threatened to render them untimely. (Ex. 28-8.)
- 45) On March 7, 2026, Father wrote directly to the Chief Justice of the Massachusetts Appeals Court to report the Family Court's improper obstruction of his direct appeals. On March 9, 2026 — two days after Father's letter to the Appeals Court Chief Justice — the Family Court rapidly reversed course and docketed all three of Father's direct appeals. The Family Court's sudden reversal confirms that its March 6, 2026 rejection was procedurally improper, and that Father's appellate filings were valid and timely from the outset. (Ex. 28-8.)
- 46) Notwithstanding the March 9, 2026 reversal, the Family Court has continued its obstruction of Father's appellate review by selectively withholding action on Father's indigency waiver motion in the DV1 docket. On March 11, 2026 — within five days of the March 9, 2026 reversal — the Family Court allowed Father's indigency waiver motions in two of his three parallel dockets. However, the Family Court has declined to act on Father's indigency waiver motion in the DV1 docket alone — the docket in which transcript costs for the pending direct appeal are needed. The Family Court's selective inaction prevents Father from obtaining the transcripts necessary to prosecute his direct appeal, thereby sabotaging appellate review of the very proceedings in which the conspiracy has been most directly operative. (Ex. 28-8.)

- 47) On March 26, 2026, Father filed a motion to compel an immediate decision on the DV1 indigency waiver, which had been docketed on March 6, 2026. The Family Court's continued failure to act on the DV1 indigency waiver, while acting promptly on the parallel dockets, was not coincidental — it is part of the same pattern of targeted obstruction that has characterized the Family Court's treatment of Father throughout the proceedings documented herein. (Ex. 28-8.)
- 48) On March 31, 2026, Father received the Family Court's response to his March 6, 2026 affidavit of indigency in the DV1 docket (docket no. [REDACTED]): an order dated March 17, 2026, granting the affidavit of indigency "allowed in full" — including \$300 per transcript for each of the three hearings and \$20 per audio recording. The order had been signed on March 17, 2026 but was not mailed to Father until March 27, 2026 — a ten-day gap between signing and mailing. Critically, Father docketed his motion to compel on March 26, 2026, and mailed his federal complaint against the SJC to the federal court on March 30, 2026. The Family Court's decision to mail the long-withheld order only on March 27, 2026 — the day after Father's motion to compel and three days before his federal submission — follows the identical pattern of reactive compliance under external pressure demonstrated by the March 9, 2026 reversal on the direct appeal notices. The ten-day mailing delay (signed 3/17, mailed 3/27) further confirms that the initial withholding was deliberate targeted obstruction rather than administrative oversight.
- 49) Upon receiving the "allowed in full" DV1 indigency waiver on March 31, 2026, Father immediately submitted transcript orders to the Massachusetts Trial Court's Office of Transcription Services ("OTS") for the three DV1 hearings directly at issue in his direct appeal: (a) the July 21, 2025 hearing before the Honorable [REDACTED] (Courtroom 11) — at which Father was verbally ordered, without any written rule or court order, to obtain both mothers' signatures before docketing his Rule 36 admissions; (b) the December 8, 2025 hearing before the Honorable [REDACTED] (Courtroom 11); and (c) the February 10, 2026 pretrial conference before the Honorable [REDACTED] — at which Mother's representative left all 437 Rule 36 requests for admission unanswered and the presiding judge confirmed Father's submissions were "uncontested and unopposed." The OTS accepted Father's transcript orders on March 31, 2026 at 12:39 PM, confirming receipt under OTS Order No. 2026-2506, as an indigent pro se appellant. The Family Court's months-long withholding of the DV1 indigency waiver — and its release only after Father's parallel federal submissions — demonstrates that the transcript obstruction was not inadvertent. (Exs. 28-7, 28-8.)

CLAIMS FOR RELIEF

COUNT I

Deprivation of Due Process of Law

42 U.S.C. § 1983 — Fourteenth Amendment

- 50) Father incorporates by reference all preceding allegations as if fully set forth herein.
- 51) The Fourteenth Amendment guarantees that no state shall deprive any person of life, liberty, or property without due process of law. Procedural due process requires, at minimum, that a person be given a meaningful opportunity to be heard by a tribunal that will genuinely consider the substance of the person's claims.
- 52) Defendants have deprived Father of his protected liberty and property interests — including his parental rights, his professional livelihood, and his right to meaningful access to the courts — without due process of law, by: (a) summarily and categorically denying Father's petitions without engaging with the substance of his uncontested, documented evidence; (b) directing Father to assemble a comprehensive record (Sept. 26, 2024 order, Ex. 28-2) and then refusing to meaningfully review that record upon submission; (c) denying Father's Rule 60(b)(6) motions regarding the secret gatekeeper order without hearing, despite uncontested documentary proof of fraud (Ex. 28-4); and (d) sustaining a pattern and practice of denial that is indistinguishable from the discriminatory scheme it was called upon to remedy.
- 53) As a direct and proximate result of Defendants' deprivation of due process, Father has suffered and continues to suffer severe and irreparable harm, including the complete alienation of his four children, forced indigency and homelessness, destruction of his professional career, and ongoing denial of justice.

COUNT II

Deprivation of Equal Protection of the Laws

42 U.S.C. § 1983 — Fourteenth Amendment

- 54) Father incorporates by reference all preceding allegations as if fully set forth herein.
- 55) The Fourteenth Amendment guarantees that no state shall deny to any person within its jurisdiction the equal protection of the laws. Equal protection requires that similarly situated persons be treated alike and that governmental action not be based on invidious discriminatory classifications.
- 56) Defendants have denied Father equal protection of the laws by systematically treating Father differently from similarly situated petitioners based on his race, color, sex, national origin, and status as a majority-group parent. The SJC's imposition of a categorical pre-filing gatekeeper restriction on Father alone (August 8, 2023, Ex. 28-2), the categorical denial of Father's petitions without meaningful engagement with his documented, uncontested evidence, and the Family Court's selective refusal to act on the DV1

indigency waiver (Ex. 28-8) while promptly acting on parallel dockets — all constitute unequal treatment that is discriminatory in purpose and effect.

- 57) The SJC's sustained pattern of denial also reinforces the underlying "reverse discrimination" scheme in the Family Court, which is itself predicated on identity-based (group/political identity) rather than individual-fact-based adjudication — a scheme now expressly condemned by the Supreme Court's decision in *Ames* (2025).

COUNT III

Deprivation of the Right to Petition **42 U.S.C. § 1983 — First Amendment**

- 58) Father incorporates by reference all preceding allegations as if fully set forth herein.
- 59) The First Amendment guarantees the right to petition the government for redress of grievances. This right encompasses the right to meaningful access to the courts and the right to have one's petitions genuinely considered by the judicial tribunal to which they are directed.
- 60) Defendants have violated Father's First Amendment right to petition by: (a) categorically denying Father's petitions over a four-year period without meaningful substantive review; (b) directing Father to build a comprehensive record and then refusing to engage with that record; (c) imposing a pre-filing gatekeeper restriction on Father alone (Ex. 28-2); (d) blocking Father's direct appeal notices in March 2026 (Ex. 28-8); and (e) threatening and imposing filing restrictions in lower federal courts to silence Father's petitioning activity. These acts constitute retaliation against Father for his protected petitioning activity and a wholesale denial of meaningful access to the courts.

COUNT IV

Deprivation of Civil Rights Under 42 U.S.C. § 1981

- 61) Father incorporates by reference all preceding allegations as if fully set forth herein.
- 62) 42 U.S.C. § 1981 guarantees all persons within the jurisdiction of the United States the same right to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens.
- 63) Defendants have denied Father the full and equal benefit of the laws and of judicial proceedings by systematically denying his petitions without meaningful review and by sustaining the state courts' discriminatory treatment of Father based on his race, color, national origin, and group identity — in violation of 42 U.S.C. § 1981.

COUNT V

Conspiracy to Deprive Civil Rights **42 U.S.C. § 1985(3)**

- 64) Father incorporates by reference all preceding allegations as if fully set forth herein.
- 65) 42 U.S.C. § 1985(3) prohibits two or more persons from conspiring for the purpose of depriving any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws, where a conspirator does or causes to be done any act in furtherance of the conspiracy, whereby another is injured in his person or property or deprived of having and exercising any right or privilege of a citizen of the United States. *Griffin v. Breckenridge*, 403 U.S. 88, 102–03 (1971).
- 66) At all relevant times, two or more Defendants — specifically the Commonwealth of Massachusetts acting through its judicial officers and agents, the SJC, and Chief Justice Budd — have acted in concert with each other and with officers of the Massachusetts Probate and Family Court and the Attorney General's Office, in a sustained conspiracy to deprive Father of equal protection of the laws and equal privileges and immunities, motivated by class-based animus against Father as a straight, white, majority-group, non-custodial, legal immigrant father.
- 67) The conspiracy's object was to permanently suppress Father's substantiated civil rights claims by: (a) concealing material evidence so as to prevent Father from obtaining an uninfected judicial record; (b) manipulating the state judicial process to generate facially legitimate orders that could be cited as *res judicata* bars in subsequent proceedings; and (c) systematically denying Father access to the courts at every level — state and federal — through coordinated procedural obstruction.
- 68) The following overt acts were committed in furtherance of the conspiracy:
- 69) Secret December 5, 2013 "Gatekeeper" Order. On or about December 5, 2013, a secret "gatekeeper" order was entered by Justice Edward F. Donnelly Jr. in Father's Family Court proceedings, the existence and contents of which were deliberately concealed from Father for more than ten years — until April 20, 2024. The order's stated "prejudice" rationale was fabricated: Father had signed comprehensive health disclosure authorizations for all three of his Harvard Medical School therapists on June 12, 2012, more than eighteen months before the order was entered. This concealment prevented Father from challenging the order or invoking it as grounds for relief in any state or federal proceeding. Every federal judgment entered against Father before April 20, 2024 was therefore entered without the benefit of evidence that the conspiracy deliberately withheld from the federal courts. (Exs. 28-4, 28-6.)
- 70) Destruction of Father's Offer of Proof and Systematic Erasure of 437 Uncontested Facts. Father's November 25, 2013 "Offer of Proof" — submitted in anticipation of the evidentiary hearing that gave rise to the December 5, 2013 gatekeeper order — was discarded and kept off the docket. Over the period 2013 through 2025, on no fewer than sixteen separate occasions, Family Court case managers truncated Father's 77-page admissions document — containing all 437 uncontested, Rule 36-deemed-admitted facts

— to two meaningless pages, thereby erasing 437 critical facts from the docket. This erasure ensured that each successive court — state and federal — would be presented with a fraudulently incomplete record incapable of supporting Father's claims on its face. (Exs. 28-4, 28-5.)

- 71) The SJC's August 8, 2023 Gatekeeper Filing Restriction (SJC-13427). On August 8, 2023, the SJC — in an order signed by all seven justices — denied Father's fifth petition and imposed a categorical pre-filing barrier requiring Father to obtain leave before filing any future petition. This restriction, applied to Father alone, was designed to impose an additional procedural layer that would allow the SJC to deny Father's petitions at the threshold without ever engaging with their substance — ensuring that the uncontested factual record Father was assembling would never receive meaningful judicial review. (Ex. 28-2.)
- 72) The "Catch-22" SJC Order of September 26, 2024 (SJ-2024-M026). On September 26, 2024 — in an order signed by all seven justices of the SJC, including Chief Justice Budd — the SJC directed Father to "demonstrate that he has no other adequate remedy and provide the court with a record to substantiate his claim." Father fully complied, assembling hundreds of pages of immediately verifiable, uncontested evidence at the SJC's own express direction. On September 5, 2025, the SJC summarily denied Father's petition without engaging with the record it had directed Father to compile — a deliberate "catch-22" designed to generate a facially legitimate denial while ensuring that Father's substantiated claims would never be reviewed. (Ex. 28-2.)
- 73) Denial of Rule 60(b)(6) Relief Without Hearing, February 25, 2026. On February 25, 2026, Justice ██████████ denied Father's motions for Rule 60(b)(6) relief from the secret December 5, 2013 gatekeeper order — without any hearing and with a "WOF" notation — despite Father's submission of uncontested, documentary proof that the order's stated rationale was fabricated. The denial without hearing, and without any engagement with the documentary evidence of fraud, constitutes a further overt act of obstruction, committed in furtherance of the conspiracy's goal of preventing any court from recognizing the fraudulent origin of the gatekeeper order. (Ex. 28-4.)
- 74) Commonwealth's Deliberate Misrepresentation to the Appeals Court, November 25, 2025. On November 25, 2025, the Commonwealth's counsel filed submissions in the Massachusetts Appeals Court (No. ██████████) that deliberately misrepresented material facts central to Father's civil rights claims — characterizing 437 Rule 36-admitted facts as "scant" evidence and mischaracterizing the gatekeeper orders as "undefined" — for the purpose of preventing the Appeals Court from recognizing the gatekeeper order's significance and thereby foreclosing Father's appellate avenue. (Ex. 28-5.)
- 75) Family Court's March 2026 Obstruction of Direct Appeals, Withholding of DV1 Indigency Waiver, and Reactive Release Under Federal Pressure. On March 6, 2026, the Family

Court improperly rejected Father's notices of direct appeal as "cannot be e-filed." On March 7, 2026, Father wrote to the Chief Justice of the Massachusetts Appeals Court. On March 9, 2026, the Family Court reversed course and docketed all three appeals — only after outside intervention. The Family Court then deliberately withheld action on Father's DV1 indigency waiver (filed March 6, 2026) while promptly allowing the parallel waivers on March 11, 2026. Although the DV1 indigency waiver was ultimately signed "allowed in full" on March 17, 2026, the Family Court did not mail the order to Father until March 27, 2026 — ten days after signing and only one day after Father's motion to compel was docketed — mirroring the same reactive-compliance pattern as the March 9 reversal. Father received the order on March 31, 2026 and immediately submitted OTS transcript orders (OTS Order No. 2026-2506, accepted 12:39 PM March 31, 2026). The months-long obstruction of the DV1 indigency waiver, and its sudden release only under parallel federal pressure, constitutes a sustained overt act of conspiracy. (Ex. 28-8.)

- 76) *Res Judicata* Based on Fraudulently Obtained Judgments. On March 25, 2026, the United States District Court dismissed Father's seventh federal complaint on *res judicata* grounds (Ex. 28-1), relying on prior federal judgments, each of which was entered at a time when the conspiracy's concealment of the December 5, 2013 gatekeeper order rendered those judgments constitutionally defective. Under *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), a judgment procured through fraud on the court cannot be given *res judicata* effect. The March 25, 2026 dismissal accordingly perpetuates the conspiracy's effects in federal court. Father's Rule 59(e) and 60(b)(6) motion to vacate that order is currently pending. (Ex. 28.)
- 77) *Class-Based Animus*. The conspiracy alleged herein was motivated by class-based animus — specifically, invidious discrimination against Father because of his race (white), sex (male), national origin (Eastern European legal immigrant), and status as a majority-group non-custodial parent. This animus is demonstrated by: (a) the Family Court's systematic favoring of the Mothers on every contested issue despite Father's superior documented parenting record; (b) the SJC's sustained refusal to engage with Father's documented evidence of reverse discrimination; (c) the Commonwealth's deployment of political-identity-based judicial policies now condemned by *Ames v. Ohio Department of Youth Services*, 605 U.S. ___ (2025); and (d) the State's coordinated suppression of Father's professional opportunities, livelihood, and petitioning activities.
- 78) As a direct and proximate result of the conspiracy, Father has suffered and continues to suffer grievous injuries: the permanent alienation of his four children; destruction of his professional career; forced homelessness and indigency; and the systematic denial of access to justice in every forum Father has approached. Father is entitled to compensatory damages, punitive damages, and such equitable relief as will break the continuing conspiracy's grip on the state and federal proceedings affecting his rights.

PRAYER FOR RELIEF

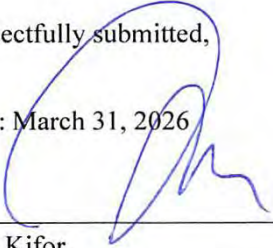
WHEREFORE, Father respectfully requests that this Court:

- a) Enter a DECLARATORY JUDGMENT pursuant to 28 U.S.C. §§ 2201–2202 declaring that Defendants have violated Father's rights under the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. §§ 1981, 1983, and 1985, by refusing to provide meaningful judicial review of Father's substantiated civil rights petitions and by conspiring to deprive Father of equal protection and equal privileges and immunities under the laws;
- b) Enter a PRELIMINARY AND PERMANENT INJUNCTION pursuant to Fed. R. Civ. P. 65, directed to Chief Justice Kimberly S. Budd in her official capacity, requiring the SJC to: (i) meaningfully review and substantively address Father's assembled SJC Record (SJ-2024-M026 and SJ-2025-M006); (ii) issue a reasoned written decision addressing the specific uncontested facts and documented evidence Father has presented; and (iii) cease the pattern and practice of categorically denying Father's petitions without meaningful substantive review;
- c) Award COMPENSATORY DAMAGES in an amount to be proven at trial, for the ongoing and continuing violation of Father's federal constitutional and civil rights;
- d) Award PUNITIVE DAMAGES in an amount sufficient to deter Defendants and others from engaging in similar conduct in the future;
- e) Waive all filing fees and costs pursuant to 28 U.S.C. § 1915, given Father's status as an *in forma pauperis*;
- f) Grant such other and further relief as this Court deems just and proper.

**JURY TRIAL DEMANDED ON ALL COUNTS SO TRIABLE
(COUNTS I–V)**

Respectfully submitted,

Date: March 31, 2026



Imre Kifor
Plaintiff, Pro Se
[demolished house] (mailbox only, house torn down)
Newton, MA 02464
ikifor@gmail.com
(857) 340-8699 (federal Lifeline program)

FILED
IN CLERK'S OFFICE
2026 APR -3 PM 12:04
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**Exhibit headers for the
complaint's 10 referenced
exhibits e-filed with this U.S.
District Court on 3/27/2026 in
the 1:25-cv-11831-AK docket,
i.e., document numbers 28,
28-1, 28-2, 28-3, 28-4, 28-5, 28-6,
28-7, 28-8, and 28-9.**

3/28/26, 3:34 PM

Gmail - Activity in Case 1:25-cv-11831-AK Kifor v. The Commonwealth of Massachusetts et al Motion to Alter Judgment



Imre Kifor <ikifor@gmail.com>

Activity in Case 1:25-cv-11831-AK Kifor v. The Commonwealth of Massachusetts et al Motion to Alter Judgment

ECFnotice@mad.uscourts.gov <ECFnotice@mad.uscourts.gov>
To: CourtCopy@mad.uscourts.gov

Fri, Mar 27, 2026 at 2:35 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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United States District Court
District of Massachusetts

Notice of Electronic Filing

The following transaction was entered on 3/27/2026 at 2:34 PM EDT and filed on 3/27/2026

Case Name: Kifor v. The Commonwealth of Massachusetts et al

Case Number: [1:25-cv-11831-AK](#)

Filer: Imre Kifor

WARNING: CASE CLOSED on 03/25/2026

Document Number: 28

Docket Text:

MOTION to Alter Judgment Imre Kifors Motion To Alter The 3/25/2026 Judgment/Order And For Relief From All Prior Judgments Pursuant To Fed. R. Civ. P. ¶ 59 (e) and 60 (b)(6), i.e., Fraud On The Court, Due To The Organized Conspiracy To Discriminate And Retaliate Substantiated In The Supreme Court by Imre Kifor. (Attachments: # (1) Exhibit The 3/25/2026 judgment or order, # (2) Exhibit The 8/8/2023 and 9/26/2024 SJC orders, # (3) Exhibit The U.S. Supreme Court petition and the appealed 9/5 and 19/2025 SJC orders, # (4) Exhibit The 12/5/2013 secret gatekeeper order, discarded Offer of Proof, and docketed Family Court motions for relief, # (5) Exhibit Proofs for clear evidence of deliberate gaslighting and the State blatantly fabricating claim preclusion, # (6) Exhibit Evidence refuting the premise of the secret gatekeeper order and proof of blackmailed Trojan horse attorneys, # (7) Exhibit Family Court-ordered stipulation prepared for the 2/10/2026 pretrial conference, # (8) Exhibit Family Court motion to compel immediate decision on request for indigency docketed on 3/6/2026, # (9) Exhibit Notice of feeling existentially threatened, LinkedIn denial of service, and 3,000+ submitted job applications since 2019)(Kifor, Imre)

1:25-cv-11831-AK Notice has been electronically mailed to:

Imre Kifor ikifor@gmail.com

1:25-cv-11831-AK Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:yes

3/28/26, 3:34 PM

Gmail - Activity in Case 1:25-cv-11831-AK Kifor v. The Commonwealth of Massachusetts et al Motion to Alter Judgment

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-0] [068385dfded856ae56efb2f304cf0ba4fa5d30d73c4b135e8284a5cd47731ad4ee35b573b237f2fa25dc8842ac147d556ece862bd34ad3c396c6511934b006e1]]

Document description:Exhibit The 3/25/2026 judgment or order

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-1] [7bc6def257d713c2eef3ebde8a0fca316ed260e9c9edda94b0eed89e280cc3bf21a7767eb71a36e38cfb21fe0271c3c987cd1bd5a6c07473c8722fde58084c2]]

Document description:Exhibit The 8/8/2023 and 9/26/2024 SJC orders

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-2] [91704d6b732ed8e8eade02a0c217df63d70cdd950d89ef411955571cbf8a1210ba129636881f715020fe29fcb5ff0673720d82aba71fa99a5144e0a77c6b4b7e]]

Document description:Exhibit The U.S. Supreme Court petition and the appealed 9/5 and 19/2025 SJC orders

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-3] [9da2aa9e247461abc3c0f99fac864716b577838fa1031999e2ff89c43b0328606e30720cf41de5255f1a5d17c58e5d98933062deba9a10f47f3e6a29d7b1b]]

Document description:Exhibit The 12/5/2013 secret gatekeeper order, discarded Offer of Proof, and docketed Family Court motions for relief

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-4] [70c853e3c279c2b00d9beec7ad63c1f43b60bf7f30e03c50e77dd0b80ab6296972063d1734f5ae45e7a29c20f727ff520e4164b0384d9342a2fdb33d3117952d]]

Document description:Exhibit Proofs for clear evidence of deliberate gaslighting and the State blatantly fabricating claim preclusion

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-5] [2809ed12f4afdbc4e9ebe81f80fe1d6b471990fcf39502469e872b7bb267c57fedabdf32426c793c702858c2bb1af2b0f4e2b5c50ba8274f959da3493f2e2974]]

Document description:Exhibit Evidence refuting the premise of the secret gatekeeper order and proof of blackmailed Trojan horse attorneys

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-6] [83950c1288a53f80a0b0f3a5ea75df7281ef9331b27b0beaf524ab995d950e346dac6df39e5049b116778c29237c8cb5f2f405792a4089930a2ee1b63be5e206]]

Document description:Exhibit Family Court-ordered stipulation prepared for the 2/10/2026 pretrial conference

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-7] [90a4108f575060b531347e5ad1e47392d1730cdd0c779b3a217ddd39ea0d2f39cecdc19a831b42ac773ad32fa3567610e136398780ab096845ba368449dbdbb]]

Document description:Exhibit Family Court motion to compel immediate decision on request for indigency docketed on 3/6/2026

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-8] [9ff5f76d188abcf5403638f66c9d30c3b2ac1dec0549e8fc07f803e6f607255961f1be29199799827433f1c97b6270911f6ae853f1090f74c4fb5f80bf2d1ee1]]

Document description:Exhibit Notice of feeling existentially threatened, LinkedIn denial of service, and 3,000+ submitted job applications since 2019

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=3/27/2026] [FileNumber=11879199-9] [c3010caef770a7a813916bbbefbb3d55dbab8f6701203536585ae98f3b01d6fafc5f805038287d6d610485448f4627add96322c0004398e11234c266d991c7c8]]

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

IMRE KIFOR,
Plaintiff,

v.

THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALEY (official capacity), ATTORNEY GENERAL ANDREA JOY CAMPBELL (official capacity), COMMISSIONER GEOFFREY E. SNYDER (official capacity, Mass. Dept. of Revenue, Child Support Services Div.), CHIEF JUSTICE JOHN D. CASEY (official capacity, Mass. Probate And Family Court Dept.), CHIEF JUSTICE BRIAN J. DUNN (official capacity, Mass. Probate And Family Court Dept.), CHRISTY OLEZESKI, PHD (official capacity, Yale School of Medicine, Yale [Pediatric] Gender Program), CEO KENNETH BURDICK (official capacity, The Counseling Center of New England -- now Lifestance Health, Inc.), CEO DR STEVEN STRONGWATER, (official capacity, Atrius Health), [REDACTED] and [REDACTED] Defendants.

No: 1:25-cv-11831-AK

IMRE KIFOR’S MOTION TO ALTER THE 3/25/2026 JUDGMENT/ORDER AND FOR RELIEF FROM ALL PRIOR JUDGMENTS PURSUANT TO FED. R. CIV. P. §§ 59 (E) & 60 (B)(6), I.E., “FRAUD ON THE COURT,” DUE TO THE ORGANIZED CONSPIRACY TO DISCRIMINATE AND RETALIATE SUBSTANTIATED IN THE SUPREME COURT

The Plaintiff, Imre Kifor (“Father”), respectfully moves this Court to alter the judgment or order dated 3/25/2026 (Exhibit 1) and to grant comprehensive “fraud on the court” relief from all the prior judgments or orders referenced by the same 3/25/2026 judgment or order (see *res judicata* discussion on page 4) pursuant to Fed. R. Civ. P. §§ 59 (e) and 60 (b)(6). Father states as follows:

EXHIBIT - 1

**The 3/25/2026 judgment or
order -- on 8 pages**

EXHIBIT - 2

**The 8/8/2023 and 9/26/2024
SJC orders -- on 6 pages**

EXHIBIT - 3

**The U.S. Supreme Court
petition and the appealed
9/5 and 19/2025 SJC orders
-- on 76 pages**

EXHIBIT - 4

**The 12/5/2013 secret
“gatekeeper” order,
discarded “Offer of Proof,”
and docketed Family Court
motions for relief -- on 36
pages**

EXHIBIT - 5

Proofs for “clear evidence of deliberate gaslighting” and “the State blatantly fabricating claim preclusion” -- on 47 pages

EXHIBIT - 6

**Evidence refuting the
premise of the secret
“gatekeeper” order and
proof of blackmailed
“Trojan horse” attorneys --
on 74 pages**

EXHIBIT - 7

**Family Court-ordered
stipulation prepared for
the 2/10/2026 pretrial
conference -- on 122 pages**

EXHIBIT - 8

**Family Court motion to
compel immediate
decision on request for
indigency docketed on
3/6/2026 -- on 70 pages**

EXHIBIT - 9

**Notice of feeling
existentially threatened,
LinkedIn denial of service,
and 3,000+ submitted job
applications since 2019 --
on 26 pages**