



Imre Kifor <ikifor@gmail.com>

## 26-1346 Kifor v. Commonwealth of Massachusetts, et al "Status Report"

CA01NoticeDocketActivity@ca1.uscourts.gov <CA01NoticeDocketActivity@ca1.uscourts.gov>

Wed, Jun 17, 2026 at  
12:39 PM

To: ikifor@gmail.com

\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\* Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

United States Court of Appeals for the First Circuit

### Notice of Docket Activity

The following transaction was entered on 06/17/2026 at 12:39:19 PM Eastern Daylight Time and filed on 06/17/2026

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

Case Number: 26-1346

Document(s): <https://ecf.ca1.uscourts.gov/docs1/00108463451?uid=2417d7fbeb3514>

### Docket Text:

STATUS report filed by Appellant Imre Kifor. Served on 06/17/2026. [26-1346] (IK)

Notice will be electronically mailed to:

Imre Kifor

Notice will not be electronically mailed to:

Andrea J. Campbell  
MA Attorney General's Office  
1 Ashburton Pl  
20th Fl  
Boston, MA 02108-0000

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

666 Document Description: 01-Status-Affidavit

Original Filename: 01-Status-Affidavit.pdf

Electronic Document Stamp:

[STAMP acecfStamp\_ID=1104935054 [Date=06/17/2026] [FileNumber=6819003-0] [97a93737338cd8ec8018fdb2b5b6fb23817c147509ba0032948e350b395d61b6247fc853a639350c1ee41479bf3cf6dbfaa117acb617a2b0034af06d5f634c2]]

666 Document Description: 02-Exhibit-1--Civil-Rights-Complaint

Original Filename: 02-Exhibit-1--Civil-Rights-Complaint.pdf

Electronic Document Stamp:

[STAMP acecfStamp\_ID=1104935054 [Date=06/17/2026] [FileNumber=6819003-1] [0e972742db4d5f18cbe26562c8a1060838a977cd73be2c519434bc6d279e16ca6885c6b4bedaf181fb2caa195d469282e2173c06b6e07c76e3e494bcd4fe89c2]]

666 Document Description: 02-Exhibit-2--OSC-Correspondence

Original Filename: 02-Exhibit-2--OSC-Correspondence.pdf

Electronic Document Stamp:

[STAMP acecfStamp\_ID=1104935054 [Date=06/17/2026] [FileNumber=6819003-2] [42013bd42a878c041224471f98c0c9876753c235c45f59178550d38934ca3efe966a5367b0aba8e5484d58f8681609bc2c71d0c99fecfd396b9c34b8c84579880]]

UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT

IMRE KIFOR,

Appellant,

v.

THE COMMONWEALTH OF  
MASSACHUSETTS, et al.,

Appellees.

No. 26-1346

(On Appeal from the U.S. District  
Court for the District of Mass., No.  
1:25-cv-11831-AK, Kelley, J.)

**APPELLANT'S SUPPLEMENTAL STATUS AFFIDAVIT ON PUBLIC-  
SERVICE EFFORTS AND THE PUBLIC DONATION DRIVE —  
REPORTING THAT THE COMMONWEALTH'S SELF-REINFORCING  
TRAP, NOW FORMALLY CHARGED TO THE ATTORNEY GENERAL'S  
CIVIL RIGHTS DIVISION BY APPELLANT'S 6/16/2026 CIVIL RIGHTS  
COMPLAINT, FORECLOSES NOT ONLY LAWFUL EMPLOYMENT BUT  
EVERY LAWFUL FINANCIAL CHANNEL, SO THAT THE PROMISES  
DISCLOSED IN APPELLANT'S PUBLIC-SERVICE AFFIDAVIT CHAIN  
CANNOT BE PERFORMED BY ANY MEANS THE LAW ALLOWS**

I, Imre Kifor, the pro se Appellant in the above-captioned matter, declare and state on personal knowledge under 28 U.S.C. § 1746 as follows:

## **I. PURPOSE**

1. This Supplemental Status Affidavit reports a development material to this Court's record that post-dates Appellant's 6/12/2026 Status Affidavit (Doc 00118461230 / Entry ID 6817814). It supplements, and continues the numbering and disclosures of, Appellant's § 1746 **Affidavit on Public-Service Efforts and the Public Donation Drive** (Doc 00118445747 / Entry ID 6809309, filed 5/12/2026) and its 5/27/2026 **Supplemental Affidavit** (Doc 00118452547 / Entry ID 6812935), and it bears directly on Appellant's pending 5/12/2026 **Emergency Motion for Injunction Pending Appeal** (Doc 00118445745 / Entry ID 6809309). It is preservational. It does not seek substantive relief, does not move to expand the briefed record, and does not delay any briefing schedule.
2. In the prior affidavit chain, Appellant disclosed to this Court the public-service efforts and the public donation drive (2026-06-01 through 2026-12-01) by which Appellant seeks to sustain lawful subsistence and his pro se litigation, and disclosed that the drive's funds are arranged through fiscal sponsorship by **Open Source Collective**, a U.S.-based non-profit fiscal host. Appellant further pre-disclosed, at ¶ 10 of the 5/27/2026 Supplemental Affidavit (Doc 00118452547), the contingency that the fiscal-sponsorship application might be declined and resubmitted. The development reported here is that this

contingency, and a second and graver one, have now materialized — and that an act of the Commonwealth committed on **June 16, 2026**, has rendered the disclosed promises impossible to perform by **any** lawful means, irrespective of how the fiscal sponsor rules.

3. The development has two documented components, both substantiated by the Commonwealth's own records:

(a) On **6/16/2026**, the Massachusetts Registry of Motor Vehicles (RMV) refused Appellant's address update and license renewal solely because Appellant's only address is a Post Office box, returning the categorical message: *"Please Change Your Address — Residential address cannot be a PO Box."* That same day, Appellant filed a sworn **Civil Rights Complaint** with the Attorney General's **Civil Rights Division**, substantiating from State-generated records that Appellant has no valid government identification and is categorically barred by the Commonwealth from obtaining any (§§ 6–10).

(b) The consequence material to this Court is not confined to employment. Because every lawful instrument for **receiving** money — a bank account, a debit or credit card, a postal money order, the identity verification of any regulated payment processor — itself requires the very government identification the Commonwealth refuses, Appellant cannot lawfully

receive even the **indirect** benefits of any donation. The fiscal sponsor's approval would not cure this, and its "single-developer" decline would not change it: **either outcome leaves the impossibility intact** (§§ 11–15).

## **II. THE PUBLIC-SERVICE AFFIDAVIT CHAIN AND THE OPEN SOURCE COLLECTIVE RE-APPLICATION**

4. As disclosed in Doc 00118445747 and updated in Doc 00118452547, the donation drive's funds are not received by Appellant directly; they are arranged to be held and disbursed at the platform level through fiscal sponsorship by **Open Source Collective**, on the OpenCollective platform, under four exclusive-use buckets, with no donor charged before the channel is live and no funds held by Appellant personally.
5. Appellant submitted the first fiscal-sponsorship application to Open Source Collective on **5/23/2026**. It was **declined on 6/3/2026** (Exhibit 2). The stated ground was model-fit — that Open Source Collective's fiscal-hosting structure is built for community-driven projects with active collaboration, and that an individual-led or early-stage project may not yet meet that bar — **not** any defect in the work product. Open Source Collective expressly invited a re-application as the project's contributor base grows. Consistent with the ¶ 10 pre-disclosure in Doc 00118452547, Appellant has continued the underlying work, opened the

public federal-statute axiomatization effort to outside contributors, and intends to **reapply to Open Source Collective at the end of June 2026.**

6. Appellant reports the foregoing so that the public surfaces of the drive and the filing channel before this Court do not diverge. But the fiscal-sponsorship status, standing alone, is **no longer the operative question** — because of the development reported next, the answer to it cannot change Appellant's ability to perform the disclosed promises.

### **III. THE 6/16/2026 RMV REFUSAL AND THE CIVIL RIGHTS COMPLAINT NOW BEFORE THE ATTORNEY GENERAL**

7. On **6/16/2026 at 2:37 PM**, Appellant attempted, through his official myRMV account at *atlas-myrmv.massdot.state.ma.us*, to update his address so that he could renew his expired Massachusetts driver's license. Appellant entered the only residential address he has — **PO Box 541095, Waltham, MA 02453**, the Bristol Lodge Men's Shelter mailing address assigned to him as a homeless person. The RMV's own system refused it outright: *"Please Change Your Address — Residential address cannot be a PO Box."* Appellant has no other address to give; he is homeless, and the shelter's PO Box is, as a matter of fact, his residence.
8. That same day, **6/16/2026**, Appellant filed under the pains and penalties of perjury a **Civil Rights Complaint** with the Attorney General's **Civil Rights**

**Division** ([civilrights@mass.gov](mailto:civilrights@mass.gov)), supplementing the Civil Rights Division complaint that the Office responded to on **3/9/2026** (Complaint #1328127) and the related Criminal Bureau matter that the Office closed on **2/26/2026** (matter 1326784). The complaint, with its State-generated exhibits, is **Exhibit 1** hereto.

9. The complaint substantiates, from the Commonwealth's own records, that the RMV refusal is the keystone of a **closed loop**, each link of which is a documented act of the Commonwealth or its instrumentalities:
  - (a) To work any job, Appellant must have a valid government ID. Appellant's Massachusetts driver's license expired on **1/10/2020**, and Appellant has no other valid identification (Ex. 1, Ex. B). On **3/25/2026**, LinkedIn — the platform on which Appellant seeks skilled employment — froze his account and conditioned restoration on submitting "a government-issued ID" (Ex. 1, Ex. C), locking Appellant out of the labor market itself, not merely of a single employer.
  - (b) To obtain a valid ID, Appellant must give the RMV a residential address that is not a PO Box. That is what the RMV refused on 6/16/2026 (Ex. 1, Ex. A). Even with the renewal fee in hand, the RMV would still refuse, because Appellant's only address is a PO Box.
  - (c) Appellant's only address is a PO Box because he is homeless. Appellant has resided continuously at the Bristol Lodge Men's Shelter since

**4/1/2025**; the shelter's case manager has verified in writing that PO Box 541095 is the only usable mailing address furnished to him (Ex. 1, Ex. D). No income → no alternative address; no job → no income; no ID → no job; only a PO Box → no ID. **The loop closes on itself.**

10. Appellant's effort is not the missing variable. Appellant has submitted **more than 3,050 job applications since 2019** (2,230-plus on Indeed, Monster, ZipRecruiter, and LinkedIn for skilled work), documented and served weekly on the parties and on the AGO (Ex. 1, Ex. E); recruiters now initiate contact on the strength of publicly verifiable technical work — a Jobot recruiter on **6/7/2026** (Ex. 1, Ex. F) and, on **6/15/2026**, an approach routing Appellant to a "Software Engineer, AI Safeguards" role at Anthropic (Ex. 1, Ex. G). The skills, the diligence, and the demand all exist. The RMV's own "Alternative Residency Affidavit" supplies no path: by its own face it reproduces the street-address bar verbatim ("PO Box, business or commercial addresses are not acceptable") and is scoped "For use by Individual Applicants under age 18" with a co-residing parent or guardian — neither of which can reach a 64-year-old unhoused adult (Ex. 1, Ex. L; complaint ¶ 6). The single artificial barrier the Commonwealth has erected, and refuses to lower, is identification.

**IV. THE DEVELOPMENT MATERIAL TO THIS COURT: THE TRAP  
REACHES EVERY LAWFUL FINANCIAL CHANNEL, NOT  
EMPLOYMENT ALONE**

11. The component newly material to this Court is that the same categorical refusal that forecloses employment **also forecloses every lawful means by which Appellant could receive money** — including the indirect benefits of the donation drive disclosed in the public-service affidavit chain. A person who holds no valid government identification cannot, consistent with federal customer-identification and anti-money-laundering requirements, **open or hold a bank account**; cannot be issued a **debit or credit card**; cannot pass the identity verification of any **regulated payment processor or money-transmitter**; and cannot, as a practical matter, be issued or negotiate a **postal money order** in any meaningful amount. Each of these instruments presupposes the very identification the Commonwealth refuses.
  
12. A fiscal sponsor such as Open Source Collective **holds and disburses** funds at the platform level; it does not, and cannot, relieve the beneficiary of the need to receive a disbursement through some lawful receiving instrument. Every such instrument requires government identification. The fiscal-sponsorship question disclosed in the prior affidavits is therefore no longer dispositive of Appellant's ability to perform: **even if Open Source Collective approves the end-of-June**

**re-application, Appellant still has no lawful instrument through which the approved funds could reach him.**

13. The two possible fiscal-sponsorship outcomes are, for this purpose, identical. If Open Source Collective **approves** the re-application, Appellant still cannot receive the funds, for want of any compliant receiving instrument. If Open Source Collective **declines** again on the "single-developer / early-stage" ground it stated on 6/3/2026 — a ground untethered to Appellant's actual disclosure that he holds no valid ID — the result is the same. The impossibility is fixed by the Commonwealth's identification bar, and is unaffected by the fiscal host's ruling either way.

14. The net effect is that the promises Appellant disclosed to this Court in the public-service affidavit chain — modest, exclusive-use, platform-held, and made in good faith — have been rendered **impossible to perform by ongoing acts of the Commonwealth**, not by any act or omission of Appellant. Appellant cannot lawfully appear on any compliant financial ledger at all: he can neither earn, nor bank, nor receive, nor hold money through any instrument the law recognizes, because the Commonwealth has refused him the one credential on which all of them depend.

**V. MATERIALITY TO THIS COURT**

15. Appellant respectfully requests that this Court take note of the foregoing for purposes of this Court's record only; no relief is sought herein. The development is reported because it deepens, with the Commonwealth's own documents and now with a sworn civil-rights complaint formally pending before the Attorney General's Civil Rights Division, the precise injury on which Appellant's pending **Emergency Motion for Injunction Pending Appeal** (Doc 00118445745 / Entry ID 6809309) and principal brief rest: a continuing, State-built deprivation that is **irreparable and worsening**. The harm is no longer prospective or contingent on a fiscal sponsor's decision — it is present, total, and self-reinforcing.
16. The deprivation is, in substance, **retaliatory** and **discriminatory**. The same Middlesex Probate and Family Court conduct on which this appeal is founded — the deliberate, multi-year falsification of the parallel dockets and the erasure of Appellant's record submissions, reported to this Court across the affidavit chain and substantiated by the never-impounded 389-page compendium described in Appellant's 6/12/2026 Status Affidavit — is what rendered Appellant homeless and forcedly indigent. The Commonwealth has now made that homelessness **both the cause and the proof** of Appellant's disqualification: it refuses Appellant's PO Box at the RMV because homelessness gave him a PO

Box, and it refuses to correct the falsified record at the Family Court because it will not recognize that PO Box as his residence. The categorical denial of the means of identification — and therefore of lawful employment, banking, and the receipt of even charitable support — operates to suppress, by foreclosing the means of lawful subsistence, Appellant's protected disclosure of the docket falsifications. That disparate treatment of a straight white legal-immigrant father is of the kind the Supreme Court condemned in Ames v. Ohio Department of Youth Services, 605 U.S. 303 (2025), and the foreclosure of access to the basic instrumentalities of life on account of indigency is of the kind condemned in Boddie v. Connecticut, 401 U.S. 371, 380–81 (1971), and Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950).

17. These same allegations of targeting and retaliation are comprehensively pleaded by Appellant, and remain **pending**, in the United States District Court for the District of Massachusetts, No. **1:26-mc-91166-DJC** (Casper, C.D.J.). Appellant reports the present development to preserve it for this Court's record and to maintain consistency across the two federal proceedings; nothing herein seeks any ruling on that pending matter. Appellant further preserves, for this Court's record, that the parallel Family Court records remain unassembled notwithstanding the **10/17/2025** assembly order (██████ J.) entered on all three

dockets, and that any disposition of Appellant's pending Family Court motions will be reported to this Court as it occurs.

18. The Commonwealth's default in this Court likewise remains uncured: the appellees' brief that this Court's 4/16/2026 Briefing Notice set for **5/18/2026** has not been filed, and no motion for extension and no appearance has been entered, as of the execution of this Affidavit.

## **VI. EXHIBITS**

19. Attached hereto and incorporated by reference:

- **Exhibit 1 — Civil Rights Complaint to the Massachusetts Attorney General's Civil Rights Division, dated 6/16/2026** (the eight-page sworn complaint and its Exhibits A–L), substantiating from State-generated records: the 6/16/2026 RMV refusal screen capture ("Residential address cannot be a PO Box") (Ex. A); Appellant's expired Massachusetts driver's license (exp. 1/10/2020) (Ex. B); the 3/25/2026 LinkedIn identity-verification restriction (Ex. C); the Bristol Lodge Men's Shelter residency verification (continuous residence since 4/1/2025; PO Box 541095 as the only usable address) (Ex. D); the weekly job-application reports (3,050-plus since 2019) (Ex. E); the 6/7/2026 and 6/15/2026 recruiter approaches (Exs. F–G); the 6/11/2026 returned Family Court Registry mailing to the demolished structure (Ex. H); Appellant's 6/12/2026 USCA1 Status Affidavit

(Ex. I); the 6/13/2026 parallel Omnibus Motion to Perfect the Appeals (Ex. J); the 5/21/2026 letter to the Appeals Court (Ex. K); and the RMV "Alternative Residency Affidavit" form (Ex. L). The complaint's certificate of service is on its face.

- **Exhibit 2 — Open Source Collective fiscal-sponsorship correspondence** (Appellant's application of 5/23/2026 and Open Source Collective's decline of 6/3/2026), evidencing the model-fit ground of the decline and Open Source Collective's express invitation to reapply, and corroborating ¶¶ 4–6 and ¶ 13 (that the fiscal-sponsorship outcome cannot cure the impossibility established by the identification bar).

I declare under penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

Executed on June 17, 2026.

/s/ Imre Kifor

Imre Kifor, Pro Se Appellant  
Bristol Lodge Men's Shelter  
PO Box 541095, Waltham, MA 02453  
[ikifor@gmail.com](mailto:ikifor@gmail.com) · (857) 340-8699  
<https://quantapix.com> · <https://www.youtube.com/@Quantapix>

# EXHIBITS INDEX

---

**Kifor v. Commonwealth of Massachusetts, et al., No. 26-1346 — Appellant's Supplemental Status Affidavit of June 17, 2026**

## Exhibit 1 — Civil Rights Complaint to the Massachusetts Attorney General's Civil Rights Division (101 pages)

---

Appellant's eight-page sworn Civil Rights Complaint of 6/16/2026, with its Exhibits A–L, as filed and emailed to the Attorney General's Civil Rights Division. Substantiates from State-generated records the closed identification loop pleaded at Affidavit ¶¶ 7–14.

Pages	Contents
1–8	The 6/16/2026 Civil Rights Complaint (eight pages), substantiating the RMV PO-Box refusal and the closed identification loop, citing <i>Boddie</i> 380–81, <i>Mullane</i> 314, and <i>Ames</i> 605 U.S. 303 (2025); the complaint's own Exhibit Index is at pp. 6–7 and its Certificate of Service is on p. 8.
9–11	<b>Ex. A</b> — myRMV address-change/license-renewal refusal of 6/16/2026: "Please Change Your Address — Residential address cannot be a PO Box," for the entered residence PO Box 541095, Waltham, MA 02453.
12	<b>Ex. B</b> — Appellant's expired Massachusetts driver's license / identification (expired 1/10/2020).
13	<b>Ex. C</b> — 3/25/2026 LinkedIn account restriction requiring a government-issued ID to restore access.
14	<b>Ex. D</b> — Bristol Lodge Men's Shelter residency verification (5/30/2025): 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/mailing address.
15–32	<b>Ex. E</b> — Weekly job-application reports (4/29/2026; 3,050-plus applications since 2019, 2,230-plus skilled), as served on the parties and the AGO.
33–41	<b>Ex. F</b> — 6/7/2026 Jobot recruiter contact, with the contemporaneous statement "my only roadblock is having no cash to renew my IDs" (p. 33), the recruiter SMS, and the attached current résumé.
42–45	<b>Ex. G</b> — 6/15/2026 recruiter approach routing Appellant to a "Software Engineer, AI Safeguards" role at Anthropic, with the Greenhouse application confirmation (6/15) and the 6/16 disposition.

<b>Pages</b>	<b>Contents</b>
46–47	<b>Ex. H</b> — 6/11/2026 returned Family Court Registry mailing, hand-addressed to the demolished 32 Hickory Cliff Rd. structure (Pitney Bowes meter No. 0008026797, metered JUN 08 2026, "RETURN SERVICE REQUESTED"), returned to sender.
48–61	<b>Ex. I</b> — Appellant's 6/12/2026 USCA1 No. 26-1346 Status Affidavit (§ 1746) on the continued active concealment of the falsified parallel Family Court dockets (the affidavit text; its own three exhibits are not re-attached).
62–89	<b>Ex. J</b> — Appellant's 6/13/2026 parallel Omnibus Motion to Perfect the Appeals (cover letter to the Register, pp. 62–63; parallel Motions for Permission, DV1 and WD, pp. 64–72; the Omnibus Motion — Relief I address correction under Rule 60(a), Relief II written decision on the undecided indigency affidavit, Relief III assembly of the records under M.R.A.P. 9 — pp. 73–79; supporting Affidavit, pp. 80–85; Exhibits Index, pp. 86–89).
90–100	<b>Ex. K</b> — Appellant's 5/20–5/21/2026 letter to Chief Justice Amy Lyn Blake, Massachusetts Appeals Court (M.R.A.P. 4(a)(1)(B), 9, 8(e)(1); pp. 90–93, with enclosures list at p. 93), with its enclosed Memoranda of Facts and Law (pp. 94–95) and the Second Amended Notices of Appeal and shared-exhibits covers stamped "RECEIVED MAY 21 2026" by the Appeals Court (pp. 96–100).
101	<b>Ex. L</b> — RMV "Alternative Residency Affidavit" (form LIC111_0218): the Residential Address field requires a street address ("PO Box, business or commercial addresses are not acceptable") and the form is scoped on its face to "Individual Applicants under age 18" with a co-residing parent or guardian.

## **Exhibit 2 — Open Source Collective Fiscal-Sponsorship Correspondence (7 pages)**

Appellant's 5/23/2026 fiscal-sponsorship application to Open Source Collective and its 6/3/2026 decline, corroborating Affidavit ¶¶ 4–6 and ¶ 13 (that the fiscal-sponsorship outcome cannot cure the impossibility established by the Commonwealth's identification bar).

<b>Pages</b>	<b>Contents</b>
1–3	Appellant's 5/23/2026 application submission confirmation to Open Source Collective (captured 2:07 PM): "Your Collective is nearly there! We will review it and let you know by mail if we need you for anything during the process."
4–6	The 5/27/2026 collective-status capture (2:04 PM) of the qagents collective page: "Collective pending approval — Awaiting approval from Open Source Collective," identifying the open-source verification framework (Lean4 theorems / LLM-evaluated predicates over federal and Massachusetts code) and Appellant as sole admin.

**Pages Contents**

---

7 Open Source Collective's 6/3/2026 decline of the application ("Your application to Open Source Collective has been rejected"), stating the model-fit ground — that the fiscal-hosting structure "is built for community-driven projects with active collaboration ... your project may not yet have the level of community involvement needed," and that the decline is for "individual-led or early-stage projects" — and expressly inviting re-application "[a]s your project grows and more contributors get involved."

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`](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/mailing 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