

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 [REDACTED] (official capacity, Mass. Probate And Family Court Dept.), CHIEF JUSTICE [REDACTED] [REDACTED] (official capacity, Mass. Probate And Family Court Dept.), [REDACTED], [REDACTED] (official capacity, Yale School of Medicine, Yale [Pediatric] Gender Program), [REDACTED] [REDACTED] (official capacity, The Counseling Center of New England -- now Lifestance Health, Inc.), [REDACTED] [REDACTED] [REDACTED] (official capacity, Atrius Health), [REDACTED], and [REDACTED],
Defendants.

No: 1:25-cv-11831-AK

JURY DEMANDED

IMRE KIFOR’S FIRST AMENDED CLASS ACTION COMPLAINT FOR CONTINUED VIOLATIONS OF TITLE VI/VII OF THE CIVIL RIGHTS ACT OF 1964 (42 U.S.C. §§ 2000d/e, *et seq.*), DEPRIVATIONS OF CIVIL RIGHTS (42 U.S.C. §§ 1981, 1983, 1985), AND SUSTAINED CIVIL RICO-LIKE (18 U.S.C. § 1962) ORGANIZED CONSPIRACY

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

INTRODUCTION

1) This is a complaint for continued deliberate violations of Title VI/VII of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d/e, *et seq.*, “Title VI [and/or] VII”) by the above Commonwealth Defendants’ (“State”) manifested (and now confirmed) sustained and systemic **conspiracy to**

“**silence and enslave**” with Marxist agenda-driven, trivially unconstitutional, “class-based,” i.e., based on merely group or pure political identities, deprivation of civil rights (42 U.S.C. §§ 1981, 1983, 1985). This conspiracy is organized (and enforced) on purpose with the now 14+ years-long, meticulously preserved and diligently substantiated patterns of Civil RICO-like (18 U.S.C. § 1962, “Civil RICO”) racketeering -- through the exclusively discriminatory (or subsequently retaliatory) “RICO Predicate Acts” of mail fraud, obstruction of justice, and (RICO) retaliations by the State and the knowingly colluding other Defendants (“Cohorts”).

PARTIES

- 2) Father is a naturalized U.S. citizen sheltering in Newton, MA 02464, who was discriminated against and subsequently retaliated against by the herein conspiracy to “silence and enslave.”
- 3) The principal Defendant, the Commonwealth of Massachusetts (in official capacity at Office of the Attorney General, One Ashburton Place, Boston, MA 02108), is the state government with (former AG and now) Governor Maura Healey (in official capacity at the Massachusetts State House, 24 Beacon St., Boston, MA 02133) and Attorney General Andrea Joy Campbell (in official capacity at Office of the AG, “AGO,” One Ashburton Place, Boston, MA 02108) as the legal representatives for the State. The other State Defendants, the legal representatives for governmental agencies & adjudicatory bodies, are Commissioner Geoffrey E. Snyder (in official capacity for Massachusetts, “Mass.,” Department of Revenue, Child Support Services Division, “DOR,” at 100 Cambridge Street, Boston, MA 02114), Chief Justice [REDACTED] and (former) Chief Justice [REDACTED] (both in official capacities at the Probate & Family Court Administrative Office, 3 Center Plaza, Boston, MA 02108). Moreover, a suit against any agency and/or adjudicatory body of the State is the same as a suit against the State itself.

- 4) The non-State Defendants are (former Mass. Guardian *ad Litem*) [REDACTED], [REDACTED] (in official capacity for Yale School of Medicine, Yale [Pediatric] Gender Program, at 333 Cedar Street, New Haven, CT 06510), [REDACTED] [REDACTED] [REDACTED] (in official capacity for the former The Counseling Center Of New England, “CCNE,” now Lifestance Health, Inc., at 4800 N. Scottsdale Road, Scottsdale, AZ 8525 -- with 36 locations in MA and 13 in NH), [REDACTED] [REDACTED] [REDACTED] (in official capacity for Atrius Health, “Atrius,” at Riverside Center, 275 Grove Street, Newton, MA 02466), [REDACTED] (“Mother-B”) at [REDACTED] [REDACTED], and [REDACTED] [REDACTED] (“Mother-C”) at [REDACTED] [REDACTED] [REDACTED] [REDACTED]. Moreover, pursuant to M.G.L.c. 151B § 4 “unlawful practices,” i.e., (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination against Father, **all the Defendants are “persons,”** i.e., “In previous cases considering waiver of sovereign immunity under G.L.c. 151B, we concluded that ‘[t]he Legislature has expressly waived sovereign immunity of the Commonwealth by including them in the ... definition of persons and employers ...’” Lopez v. Commonwealth, 463 Mass. 696, 702 (Mass 2012).
- 5) Father notes that, contrary to prior projections, he has **never** been a government employee.
- 6) Father also notes that Atty. [REDACTED], at [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] MA [REDACTED] [REDACTED] - [REDACTED] - [REDACTED] and [REDACTED], has informed him via email on 1/28/2023 that “Please be reminded that I represent Ms. [REDACTED] on all matters in all courts. Any matters pertaining to her should be sent to my attention.”

¹ The two “Mothers” herein listed addresses are the last physical addresses known by Father.

JURISDICTION

- 7) This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 & 1343, because it arises under the laws and the Constitution of the United States and is brought to redress/recover damages for the sustained and systemic deprivation of civil rights.
- 8) Further jurisdiction also exists pursuant to 28 U.S.C. §§ 2201 & 2202 and 42 U.S.C. § 1983.
- 9) Supplemental jurisdiction over Father's claims made under Massachusetts state law exists pursuant to 28 U.S.C. § 1367. State courts have concurrent jurisdiction over deprivation of civil rights. Father's pending lawsuits (or the appeals thereof) in the Middlesex Probate And Family Court ("Family Court") and Middlesex Superior Court ("Superior Court") are about the consequences of the conspiracy to "silence & enslave." Specifically, about the predictable outcomes of Father's deliberately violated constitutional rights -- continued on purpose only to keep prior discriminations and subsequent retaliations concealed -- and the obstruction of the (now substantiated) attorney-assisted/discrimination-based Rule 60(b) fraud on the court.
- 10) Each and all of the acts (or threats of acts) alleged herein were committed by the Defendants, and/or their officers, agents, and employees, under the color & pretense of the statutes, rules, and regulations of the Commonwealth. Therefore, the Court has personal jurisdiction because the Defendants committed the described prohibited (and tortious) ongoing acts in this district.
- 11) Nationwide service of process is pursuant to 18 U.S.C. § 1965(b). Father invokes this Court's diversity jurisdiction as parties from multiple states are involved. Father invokes jurisdiction under the Class Action Fairness Act as the dispute involves realized damages of \$5,000,000+.

VENUE

12) The venue is proper in this judicial district pursuant to 28 U.S.C. § 1391 and 42 U.S.C. § 2000d/e because the Defendants reside and conduct business in this district and a substantial part of the events and deliberate violations giving rise to the claims alleged herein occurred in this district and because the alleged unlawful discrimination & retaliation practices were committed here, and relevant records to those practices are maintained and also administered here. The Defendants are jointly engaged in wrongful conduct in this district and have such minimum contacts with this district that exercising jurisdiction is thus just and reasonable.

ADMINISTRATIVE REMEDIES

13) Father could not have brought these connected and interdependent specific claims any earlier.

14) Moreover, Father has exhausted his administrative remedies and complied with all statutory prerequisites to his Title VII claims. Mass. Commission Against Discrimination's (MCAD) latest notice of administrative dismissal due to "adjudication by another forum" is attached.

15) Pursuant to instructions received from the DOJ's Civil Rights Division, the Criminal Section, Father mailed his (also attached) "Renewed Complaint For Violations Of Title VI/VII Of The Civil Rights Act Of 1964 (42 U.S.C. §§ 2000d/e, *et seq.*), Deprivations Of Civil Rights (42 U.S.C. §§ 1981, 1983, 1985), And For A Systemic And Sustained Civil RICO (18 U.S.C. § 1962) Conspiracy - With Its Prohibited Activities" to FBI Director Kash Patel on 9/8/2025.

16) Consequently, Father hereby incorporates the entirety of the text of his FBI complaint herein.

THE CHILD-PREDATORY AND PROFITEERING DISCRIMINATION SCHEME

- 17) Father's attached (and hereby incorporated herein) "Affidavit On Facts And Memorandum Of Law In Support Of Amended Class Action Complaint For Continued Violations Of Title VI/VII Of The Civil Rights Act Of 1964, For Deprivations Of Civil Rights, And For Sustained Civil RICO-Like Organized Conspiracy" presents the concise factual basis and legal context for his claims of organized discriminations and subsequent targeted retaliations.
- 18) Starting on 1/31/2022, Father has been petitioning the Massachusetts Supreme Judicial Court ("SJC") with his claims that the State had subverted the "innocent until proven guilty" core principle of the rule of law, i.e., by replacing it with a) a manifestly profiteering "LGBTQ+" agenda (for fraudulently "maximized" federal reimbursements), and b) the Stalinist-inspired "guilty until proven innocent -- but with proofs purposefully discarded and evidence erased."
- 19) Significantly, after repeated threats of sanctions against the forcedly indigent Father, the SJC ordered on 9/26/2024 that "The court will grant leave [for docketing his petition] if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim." Consequently, Father furnished the SJC with his "SJC Record," i.e., SJ-2024-M026 & SJ-2025-M006. Moreover, he substantiated that "**reverse discrimination**," i.e., any group or political identity-based "double protection," is meaningless/ineffective (as a means for fraudulently "maximizing" federal reimbursements) if the above two Mothers do not perjure themselves for "the cause" in the Family Court. Specifically, Father's expanded SJC Record reveals not only the sought proofs of the committed obstructions of justice, but also demonstrates the **concise mechanism** behind the deliberate scheme that the State uses as a base for its deeply child-predatory "feminist" and purely profiteering "LGBTQ+" agenda.

- 20) As Massachusetts law does not recognize reverse discrimination, this scheme, i.e., silencing and enslaving a majority on purpose for fraudulently “maximized” federal reimbursements, also directs the AGO, MCAD, Superior Court, etc., to endlessly reject Father’s complaints.
- 21) Specifically, Father’s G.L.c. 151B discrimination complaint against the State in the Superior Court was dismissed by effectively reiterating the State’s defense that “[Father’s] claims [of disparate treatment] are barred by absolute judicial or prosecutorial immunity because they arise from: judicial rulings in custody and child support proceedings in the Family Court; the prosecution of those proceedings; or decisions [by the AGO] not to pursue alleged civil rights claims arising out of those proceedings.” Had any “reverse discrimination” been recognized by state law, the precedent from Lopez v. Commonwealth, 463 Mass. 696, 703 (Mass. 2012), would have applied, as Father duly constructed his effectively identical discrimination claims against the State by following the pattern established by the Black & Hispanic police officers.
- 22) While Massachusetts claims protection for all from G.L.c. 272, § 98, “main” discriminations (based on race, color, sex, gender, and national origin) and all subsequent G.L.c. 151B, § 9, “unlawful practices” (i.e., G.L.c. 151B, § 4 (4) retaliation, (4A) interference, and (5) aiding and abetting employment discrimination), Father and all white, straight male, and mere non-custodial parent members of a “**never to be protected class**” are fully and silently excluded.
- 23) Consequently, the manifestations of the federal Civil RICO “prohibited activities” (e.g., mail and wire fraud, obstruction of justice, and repeated/targeted direct retaliations -- that Father has consistently alleged in his complaints) coincide precisely with these “unlawful practices.”
- 24) Significantly, Father’s SJC Record diligently substantiated already on 2/10/2025 that proving the repeated cycles of sustained and systemic disparate treatments had been plain impossible

before the a) “NOT GUILTY” (for not paying child support/expenses) reversal on 2/26/2024 regarding the prior invidious/maliciously baseless “Father has hidden Romanian assets” mere projections; b) quiet revealing on 4/20/2024 of the 12/5/2013 “secret” (i.e., discrimination-obstructing) “gatekeeper” order; and c) the SJC’s confirmation on 5/31/2024 of the invidious mail fraud, the falsified dockets, and the repeatedly & **continually sabotaged** direct appeals.

25) Consequently, Father concluded to the SJC that “It is obvious that with the Family Court’s a) allowed mail fraud, b) secret ‘gatekeeper’ orders, c) forcedly faulty [and falsified] filings, d) openly discarded pleadings, and e) large-scale verifiable erasure of even the now uncontested facts, no targeted parties will ever have peace or justice.” Accordingly, **proof of intent (and motive)** for the “organized discrimination scheme” arrived with the needlessly delayed filing of the “Brief Of The Commonwealth Of Massachusetts, Governor Maura Healey, Attorney General Andrea Campbell, Commissioner Geoffrey Snyder, And Middlesex County Probate And Family Court” with the Massachusetts Appeals Court, No. [REDACTED], on 11/25/2025.

SUMMARY OF RELEVANT (AND NOW UNCONTESTED) FACTS

26) As substantiated by the duly attached (and hereby incorporated herein) Father’s: a) “Affidavit Verifying His Only Valid Physical Mailing Address As Requested By The Supreme Court On 11/21/2025,” b) “Status Affidavit On The Fifth Petition For A Writ Of Certiorari Mailed To The U. S. Supreme Court,” and c) “Status Affidavit In Support Of Amended Class Action Complaint For Continued Violations Of Title VI/VII Of The Civil Rights Act Of 1964, For Deprivations Of Civil Rights, And For Sustained And Systemic Civil RICO-Like Organized Conspiracy,” Father has been the direct (and long-term) target of the sustained and systemic statutory (“reverse”) discriminations and all the subsequent deliberately targeted retaliations:

- a) Family Court deliberately discriminated against Father when assigning him the physical custody of his children without also awarding him proper child support from the mother.
- b) Family Court deliberately discriminated against Father when it “stole” the children from him four years later -- only because he was a legal immigrant with a valid U.S. passport.
- c) Family Court retaliated against the complaining Father when it unconditionally endorsed the two Mothers’ baseless and malicious mere projections -- that attempted to recast the recorded history into “a victimized American mother bullied by a millionaire ‘Romanian’ legal immigrant suddenly ‘fleeing the U.S.’ in fear” -- only to conceal the **multi-million dollar perjuries/attorney-assisted subornations of perjuries** forced onto the Mothers.
- d) Family Court deliberately retaliated against the complaining Father on a professional, i.e., employment-related, level by fraudulently invalidating the initial 4 years (before May of 2011) and the subsequent 3 years (before the 6/30/2014 judgment) of Father’s full focus on being a dedicated/loving full-time father for his 4 children. Specifically, Family Court endorsed a manifestly malicious/overwhelmingly erroneous, but “activist,” GAL report -- baselessly projecting onto Father “possible personality disorders” (for being an always legal immigrant) -- while forcefully rejecting the three Harvard Medical School clinical doctors and psychiatry professors’ comprehensive/long-term evaluations and conclusions:
 - (1) [Father] presents no danger to his [dear four] children;**
 - (2) There is no indication of impairment of [Father’s] fitness to parent.**
- e) As the years of Father’s full-time parenting cannot be erased, and the State has since fully alienated his children from him, the forcefully induced -- through the deliberate “absolute employability” retaliations based on Father’s race, color, sex, and national origin -- lack

of “professional continuity” in Father’s resume can only be explained (even before any “screening” interviews) by preemptively/voluntarily disclosing that “it’s discrimination/retaliation by the State and currently in the courts,” prior to the “why?” questions for Father’s **now 2,880+ diligently submitted and compliant job applications** since 2019.

- f) Family Court continued to discriminate and retaliate against Father (with the intentionally frivolous complaints for contempt) when docketing/endorsing baseless, mere projections:

“[He] now claims that he has no money, no income, no assets. Indeed, he disposed of assets during litigation for less than their actual value, then claimed he was harmed. It is believed that he has hidden assets with his parents, who have returned to Romania.”

- g) Father has no money, property, assets, etc., anywhere, and Father’s parents did not return to Romania. However, motivation for the State joining the drive to retaliate against Father comes from his “Castrating young American boys?” email -- diligently reporting on 1/12/2018 about the deeply child-predatory (and now substantiated) transgressions committed in Family Court by “feminist” Harvard GALs -- to the Defendant Gov. Healey, the Mass. Attorney General at the time. Father later summarized his complaints for retaliation, i.e.,

“The GALs went on to lead the American Psychological Association and Pediatric Gender Program at Yale. My [induced] forced indigency started with my email:

Dr. Olezeski, is your ‘Pediatric Gender Program,’ in fact, in plain English, castrating young American boys? It is well known that the Nazis, as part of the ‘emerging eugenics movement,’ started with castrating the hated ‘inferior’ minorities (for clarity, I grew up as a deeply hated minority in a ruthless

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

- h) Father has also complained that out-of-state companies, i.e., CCNE, were used as the well-informed, and thus, “interstate-commerce”-applying, Civil RICO conspirators.
- i) CCNE enabled the State to retaliate against Father -- and crushingly interfere with his civil rights -- by deliberately and forcefully alienating his children, despite that “extreme parental alienation should be considered emotional child abuse and referred criminally.”
- j) Using CCNE’s “out-of-state” services, knowingly referred to by Atrius, the State induced the damaging, but agenda-driven, **forced “fatherlessness”** in Father’s dear four children.
- k) CCNE’s “torture-children-on-demand” services allowed the State to turn the children’s Marxist-inspired “brainwashing” (against their loving father) untraceable in the State’s courts -- while combining it with the out-of-state forced/unlawful medicating of children.
- l) Consequently, Father has summarized to the SJC the abuses of judicial discretions -- that underlie the 2/13 and 6/30/2014 judgments --, as the Family Court forcefully overruled:
 - 1) even the GAL’s admission of errors, 2) the 3 Harvard therapists’ joint conclusion that Father “presented no danger to his children,” 3) the attorneys’ substantiated collusion to defraud the court itself (for their **estimated \$1,265,112** of fraudulent ‘legal fees’), 4) the verifiable record of Father’s and his family’s clear political asylum in 1986, and 5) that the three Harvard Medical School medical doctor and professor therapists professionally wanted nothing to do with the Family Court’s deeply child-predatory blatant profiteering.
- m) To prevent Father from testifying in person about receiving government assistance on 3/14/2025, Family Court cancelled the hearings scheduled for 4/28/2025. The manifested

objective has always been to sabotage Father's diligently substantiated 12 “Motions For Relief From Judgments Pursuant To Rule 60 Fraud On The Court.” These were the first instances that manifestly and verifiably demonstrate how the Family Court deliberately falsifies the three dockets, as Judge Allen’s denials confirm the resulting “lack of facts.”

- n) Father’s SJC Record finally has immediately verifiable plain evidence that a) pleadings are discarded by case managers, and b) comprehensive (437) now uncontested facts are verifiably erased. In fact, Family Court deceptively “allows” the requests for permission to file the full 77-page-long documents, only to then docket a mere 2 meaningless pages.
- o) Therefore, Family Court deliberately continues to discriminate & retaliate against Father (now living on government aid) due to their ultimate “**collateral**” motive, i.e., to avoid federal penalties at all costs/forcefully maintain the fraudulent *status quo* of the dockets.
- p) The Family Court’s priority, therefore, can only be achieved if all, even uncontested, facts are **routinely erased from the dockets**, and all prior injunctions -- the committed acts of deliberate and direct “reverse discriminations” against Father -- are endlessly continued.

CASE HISTORY AND THE “REVERSE DISCRIMINATION” SCHEME

- 27) In his previous petition to the Supreme Court, Father complained that this Court (“USDC”):
 - a) Dismissed his case on 12/21/2023, and Father’s subsequent motion to alter or amend the judgment was denied on 1/5/2024. The denial to alter was reiterated on 1/22/2024. Father timely filed a notice of appeal on 1/9/2024. Consequently, Father presented the following issues for review to [the U.S. Court Of Appeals For The First Circuit (“USCA1”): (1) Father is a *pro se* and *forma pauperis* party but **not a prisoner** as [USDC] noted “[He] claims that he is under ‘implicit long-term house arrest’ ... his allegation of ‘implicit’

custodial status at this point is wholly inadequate ... a review of the Petition and exhibits does not reveal that [he is] currently in custody at all,” Kifor v. Probate & Family Court et al., No. 20-11601-PBS; and (2) In the context of the 2/16/2023 Presidential Executive Order (“[Biden’s] Executive Order”), Father asserted even to The White House on 1/26/2024: “As I have not committed any crimes, have never been convicted, and have never been a prisoner, I immediately objected to [USDC’s ‘background circumstances’-driven projection of] **‘prisoner-like’** (but purely group [/political] identity-based) segregation.”

- b) In the context of the 12/21/2023 dismissal, the raised issues for review were: A... B... C. Is [USDC] justified to openly and deliberately engage in a “dogmatic interplay” with the agenda-driven statutory discriminations & retaliations by Massachusetts and thus actively advance “prisoner-like” segregations? ... Substantiating Father’s “dogmatic interplay” claims between state and federal courts, he was ordered to effective silence, i.e., “[Father] is warned that if he continues to file any future complaints in this [USDC] concerning the proceedings in state court, he may be restrained from filing any future complaints with this [USDC] as well as become subject to other filing restrictions and sanctions.”
- c) Despite the substantiated discriminations and deliberate retaliations against Father by the State, the USDC still concluded that “To the extent [Father] seeks injunctive relief against state officials, [he] has not stated a viable claim for relief under the narrow exception to sovereign immunity” while deceptively claiming “In conducting this [Title VI violations] review, the [USDC] liberally construes the complaint because [he] is proceeding *pro se*.”
- d) Moreover, to silence a *pro se* and *in forma pauperis* Father, USDC ignored the context of the original Gonzalez-Gonzalez v. U.S. citation -- as it was carefully qualified: “A *sua*

sponte dismissal **may** stand ... [but] *sua sponte* dismissals are **risky** business ... We will uphold a *sua sponte* dismissal only if allegations are patently **meritless**.” Continuing with the substantiated discrimination scheme to “silence and enslave” Father, the USDC also asserted that “as a *pro se* plaintiff, [Father] cannot act as a class representative cannot fairly and adequately represent the interests of the class that he has identified.” Treating all *pro se* and *in forma pauperis* parties as mere “prisoners,” USDC ignored the context of the original Avery v. Powell citation as it was qualified: “[A]n inmate incarcerated, [a] *pro se* plaintiff **may** not possess the knowledge and experience necessary to protect the interests of the class ... requiring complex statistical evidence.” However, Father is not an incarcerated inmate but a trained professional and mathematician, specifically in studying complex systems. The USDC’s discrimination scheme of casting all *pro se* and *in forma pauperis* parties into mere “prisoners” also continued by ignoring the full context of the Murphy v. Baker citation as well -- specifically that “courts have routinely denied a **prisoner’s** request to represent a **class of prisoners** without the assistance of counsel.”

e) The USDC’s reframing of the directly implied Howard v. Pollard opinion is even more troubling as it deliberately disregarded the original intent and reasoning of the citation: “We deny the ... petition because it does not raise a novel issue of class-certification law and the petitioners do not establish that the denial of class certification signals the death knell of their action ... decisions establish that it is **generally** not an abuse of discretion to deny class certification on the ground that a *pro se* litigant is not an adequate class representative ... But the purpose of Rule 23(g) is not to enable *pro se* plaintiffs to obtain counsel ...; the purpose is to ensure that the proposed class counsel is adequate.”

f) Regardless, with President Trump's recently issued "[Ending Illegal Discrimination And Restoring Merit-Based Opportunity](#)"² Presidential Action, all previous, Marxist-inspired "equity-based" (or mere social justice) presumptions have been rescinded, and new claims for federal Title VI/VII civil rights violations will have to be reviewed based on the individual facts and merits. Consequently, Father has renewed his USDC complaint.

28) This Court (and subsequently USCA1) could effectively ignore Father's every utterance, and treat him as a mere "prisoner" without any rights to complain about anything, apparently due to the "background circumstances" rule nullifying all his claims. However, on 6/5/2025, the Supreme Court invalidated the background circumstances rule for Title VII claims, resolving a split in federal circuits and holding that courts must evaluate claims brought by majority-group plaintiffs under the same evidentiary framework as for the minority-group plaintiffs.

29) The routine imposition of the additional burden by such "background circumstances" rules, Justice Ketanji Brown-Jackson wrote, "cannot be squared with the text of Title VII or our longstanding precedents," *Ames v. Ohio Department of Youth Services*, 605 U.S. ___ (2025).

30) Specifically, "The law's focus on individuals rather than groups is anything but academic. By establishing the same protections for every 'individual' -- without regard to that individual's membership in a minority or majority group -- Congress left no room for courts to impose special requirements on majority-group plaintiffs alone ... Our case law makes clear that the standard for proving disparate treatment under Title VII does not vary based on whether or not the plaintiff is a member of a majority group. Accord to *Bostock*, ('This statute works to

² See <https://www.whitehouse.gov/presidential-actions/2025/01/ending-illegal-discrimination-and-restoring-merit-based-opportunity/>.

protect individuals of both sexes from discrimination, and does so equally’), the ‘background circumstances’ rule flouts that basic principle,” Ames v. Ohio Dept. of Youth Serv., *supra*.

31) The background circumstances rule (or “reverse discrimination”) had been so entrenched that even the USCA1 ignored Father’s “Motion For Injunction Against The Manifestly Vindictive Commonwealth Defendants And For Declaration That President Biden’s Marxist-Inspired ‘Equity For All’ Blatant Deception Is Unconstitutional” e-filed and justified on 11/12/2024:

“... As already established since 10/14/2024, the Family Court continues to refuse to docket even Father’s e-filed and timely oppositions (supported by his affidavit and extensive relevant evidence) to a maliciously biased and otherwise hateful anti-immigrant motion. As the thus committed predicate acts of the [Civil] RICO racketeering activities support Father’s assertion that ‘no remedy for discrimination is ever possible if the evidence is deliberately discarded or erased by the perpetrators themselves,’ they also simultaneously violate [both Title VI/VII]. WHEREFORE, Father respectfully requests this Court to a) enjoin the child-predatory ‘feminist’ and profiteering ‘LGBTQ+’ agenda-driven State from discriminating against the significant number of immigrant men by either inciting the ‘ignorant illegals’ into violating federal law or effectively discarding the legal immigrant men as mere ‘Biden’s garbage,’ by outright erasing their evidence & systemically nullifying their complaints and b) declare that [former] President Biden’s 2/16/2023 Executive Order is unconstitutional, as it deceptively intends to foster the above discrimination [scheme] by the states against the predominantly male immigrants.”

32) As a consequence of the relentless disparate treatments against Father by the State, i.e., his **induced forced indigency**, Father’s existence and housing have also been destabilized. The

underlying stereotypical (and factually baseless) projections had been that he was somehow living in “luxury” with “hidden Romanian assets.” On the contrary, Father began receiving Mass. DTA/SNAP benefits and actual food from two Newton Food Pantries on 3/14/2025.

33) He also started sleeping in a tent in Newton, MA. The city’s Director of Human Services later allowed him to call the Bristol Lodge Men’s Shelter in Waltham on 3/28/2025. She also prepaid a cell phone that Father could use to call the homeless shelter’s “daily lottery” for bed availability. A bed became available on 4/1/2025, and upon immediately completing his intake, Father was accepted to stay -- though only during the night -- at the homeless shelter for the next 90 days. **Father has been sleeping at the shelter every night since 4/1/2025.**

34) Revealing the State’s deeply predatory & profiteering -- initially for federal funds -- motives, Father now has proof that, as a legal immigrant/citizen, he is receiving \$298/month aid and a bed in a shelter with ~50 people, whereas the State is extorting 10+ times that amount from taxpayers per illegal immigrant, see “[Migrant influx pushing Mass. shelter costs past \\$1B in FY25](#): Mass. taxpayers are forking out around \$1,000/person/week under the program... Gov. Healey’s administration has already spent \$830 million so far in FY25, accommodating more than 4,000 families who have been receiving taxpayer-funded shelter, food, education, legal aid, and case management. The costs work out at about \$3,496/week per family, or around \$1,000/person/week for the program, known as the Emergency Assistance (EA) system.”³

35) Father specifically notes that, despite his four children being extensively tortured by the State with the agenda-driven forced “fatherlessness,” his diligent application was rejected by the

³ See <https://www.foxnews.com/politics/migrant-influx-pushing-mass-shelter-costs-past-1b-fy25-report>.

same Emergency Assistance (EA) system -- apparently because it would have contradicted (and penalized) the State's demand for the half million dollars of fraudulently and usuriously accumulated child supports, i.e., the numerically proportional federal CSE reimbursements.

CLAIMS FOR CLASS-BASED RELIEF

36) As the proclaimed "feminist" and "LGBTQ+" progressive agenda is a facade to conceal the child-predatory and profiteering intent to deliberately discriminate and subsequently retaliate -- while confusing & damaging our dear children with the forced "fatherlessness" -- through "reverse discriminations," i.e., against white and straight (that is, non-LGBTQ+) fathers and the "useless" legal immigrants, Father renews his complaints for violations of his civil rights:

"Despite my now confirmed homelessness and explicit reliance on government aid and assistance, [the Family Court is set] to continue to protect the undisturbed flow of the fraudulently 'maximized' federal reimbursements on the half-million dollar usuriously accumulated in-arrears child supports and court-ordered child-care expenses -- while also effectively denying my impoverished children the benefits of my documented ~\$10M+ that the [State] has deliberately injured and damaged me with over the last now 14 years."

Property taxes		\$25,125
"Shared" house		\$380,603
"Big" house		\$1,556,865
Mother-B GALs	$\$48,214 / 2 = 24,107$	\$24,107
Mother-C GAL		\$7,000
"Legal" expenses		\$224,213
"Therapy" expenses		\$157,288
"Supervision" expenses		\$56,944

Forced investments	Metrology instruments	\$150,000
Double taxation		\$65,000
Subtotal (direct losses)		\$2,647,145
CPI Inflation Adjusted	U.S. Bureau of Labor calculator	\$3,809,077
S&P 500 Historical Return	Inflation-Adjusted Price Return	\$9,606,926
Missed income (14.5 years)	\$350K / year	\$5,075,000
Pro Se "legal" expenses	Opposing a \$500+/hour partner at large law firm	\$836,000
"Survival" expenses	85 months x \$2,836	\$241,060
Subtotal (ongoing losses)		\$6,152,060
Total /w CPI Inflation		\$9,961,137
Total /w S&P 500 Historical		\$15,758,986

37) The class, therefore, is defined as the white and straight (that is, non-LGBTQ+) fathers and/or the "useless" legal immigrants who have been forced to proceed to trials in Family Court.

38) Pursuant to Fed. R. Civ. P. § 23 (a), (1) the class is so numerous that the joinder of members is impracticable⁴; (2) there are questions of law or fact common to the class; (3) the claims or defenses of the representative parties are typical of the claims or defenses of the class; and (4) the representative parties will fairly and/or adequately protect the interests of the class.

39) Pursuant to Fed. R. Civ. P. § 23 (b) (3), (1) the questions of law or fact common to the class predominate over any questions affecting only individual members, and (2) class action is superior to other available methods for the fair and efficient adjudication of the controversy.

⁴ The number and identities of class members can be determined through court records, testimonies, and disclosures.

- 40) No unusual difficulties will likely be encountered in managing this action as a class action, and the likelihood of any individual members prosecuting their separate claims is remote.
- 41) Moreover, the alleged injuries were caused by a shared set of written misrepresentations.
- 42) Specifically, the same or similar misrepresentations were made to the named plaintiff (i.e., Father) in three separate Family Court dockets. Father is a representative plaintiff. He was directly injured by relying (to his detriment) on the sustained & systemic misrepresentations.
- 43) Individual questions of causation cannot predominate, as the same or similar representations can be made to different members of the proposed class. Father claims that the Defendants made “standard” misrepresentations, i.e., **“white straight fathers and/or legal immigrants must always be precluded from filing any of their individual facts in the Family Court.”**
- 44) While each plaintiff must prove such reliance (as in this case), Father believes (based on the nature of the generic misrepresentations at issue) that the circumstantial evidence that can be used to show reliance is common to the whole class. Father asserts that no more immediate victim is better situated to sue than he. The questions of law and fact which are common to the entire class (and which predominate over questions affecting an individual class member) are as follows: (a) whether the Defendants have engaged in common law fraud and violations of civil rights; (b) whether the Defendants’ organized conspiracy for the violations followed the Civil RICO-like racketeering patterns; (c) whether the Defendants’ unlawful acts resulted in unjust enrichment; (d) whether Father and the class are entitled to injunctive and equitable relief; (e) whether the Defendants’ acts were willful, entitling the class to punitive damages.
- 45) Moreover, Father is a member of the class. Father is committed to prosecuting this action.

- 46) Father's claims are typical of the claims of the other members. He has no antagonistic or conflicting interests with those he seeks to represent. Father is an adequate representative of the proposed class. Once again, the likelihood of individual class members prosecuting separate actions is remote due to the relatively small loss suffered by each class member (compared to the burden and expense of prosecuting litigations of this nature and magnitude).
- 47) Absent a class action, the Defendants are likely to avoid liability for their wrongdoing, and the individual class members are unlikely to obtain redress for the wrongs alleged herein.
- 48) Adjudication of this case on a class-wide basis is manageable by this U.S. District Court.
- 49) As a materially significant fact of the matter, Father has been forcedly indigent since 2018, and he alleges that his forced indigency has been the direct and foreseeable consequence of the Defendants' deliberate actions and/or decisions substantiated throughout this complaint.
- 50) The layman Father has also been a *pro se* litigant -- without the ability to pay for services.
- 51) As Father is not an attorney, Father cannot legally represent the described class in this Court.
- 52) However, Father continues to hold that he is a **proper representative of the class**. Therefore, Father is ready to accept a precondition to the class certification that the class itself be legally represented in this Court by a to-be-determined and retained attorney approved by this Court.
- 53) Consequently, as the Supreme Court has now invalidated the background circumstances rule and new claims of "reverse discrimination" can become a reality, Father claims as follows:

COUNT I - TITLE VI VIOLATIONS - DISCRIMINATIONS AND RETALIATIONS

- 54) The allegations of prior paragraphs (including Father's attached affidavits) are incorporated herein by reference. Therefore, the State has deliberately violated the Title VI provisions by

continuing to commit sustained and systemic discriminations and subsequent (i.e., upon his consistent complaints) retaliations against Father -- based on race, color, and national origin -- by specifically conspiring against and violating Father's due process and equal protection constitutional rights with repeated cycles of organized acts -- reflecting a now 14+ years-long racketeering pattern -- including: mail/wire fraud (e.g., secret "gatekeeper" orders and fraud-based decisions), obstruction of justice (e.g., forcedly faulty filings, falsified court dockets, discarded evidence and pleadings, erased uncontested facts), and repeated direct retaliations (e.g., ambiguous/inconsistent rulings, cancelled hearings, continuously sabotaged appeals).

COUNT II - TITLE VII VIOLATIONS - ABSOLUTE EMPLOYMENT RETALIATIONS

55) The allegations of prior paragraphs (including Father's attached affidavits) are incorporated herein by reference. Therefore, the State has deliberately violated the Title VII anti-retaliation provisions by continuing to commit sustained/systemic retaliations against Father -- upon his consistently filed complaints for discriminations based on race, color, sex, and national origin -- by specifically conspiring against and violating Father's due process and equal protection constitutional rights with repeated cycles of organized acts -- reflecting a now 14+ years-long racketeering pattern -- including **deliberately caused "adverse employment actions"** (e.g., invalidating years in his professional resume without giving a chance to correct the attorney-assisted multi-million dollar fraud/perjury/subornation of perjury and endorsing the repeated frivolous complaints for contempt), mail/wire fraud (e.g., secret "gatekeeper" orders, fraud-based decisions), obstruction of justice (e.g., forcedly faulty filings, falsified court dockets,

discarded evidence and pleadings, erased uncontested facts), and repeated direct retaliations (e.g., ambiguous/inconsistent rulings, cancelled hearings, continuously sabotaged appeals).

COUNT III - VIOLATIONS OF 42 U.S.C. §§ 1981, 1983, AND 1985

56) The allegations of prior paragraphs (including Father's attached affidavits) are incorporated herein by reference. Therefore, the Defendants have deliberately continued to violate the 42 U.S.C. §§ 1981, 1983, and 1985 provisions by **specifically colluding and conspiring** against -- and systemically depriving -- Father of his due process and equal protection constitutional rights with repeated cycles of organized acts -- reflecting a now 14+ years-long racketeering pattern -- including: mail/wire fraud (e.g., secret "gatekeeper" orders, fraud-based decisions), obstruction of justice (e.g., forcedly faulty filings, falsified court dockets, discarded evidence and pleadings, erased uncontested facts), and repeated direct retaliations (e.g., baseless, false, and frivolous discriminatory/retaliatory allegations, claims, submissions, and representations, ambiguous/inconsistent rulings, cancelled court hearings, continuously sabotaged appeals).

COUNT IV - CIVIL RICO-LIKE ORGANIZED CONSPIRACY

57) The allegations of prior paragraphs (including Father's attached affidavits) are incorporated herein by reference. Therefore, the Defendants have deliberately continued to violate civil rights, i.e., **due process and equal protection constitutional rights**, by colluding/conspiring against Father and, generically, against his white and straight fathers, and/or legal immigrants class with long-term, organized, Civil-RICO-like patterns of racketeering through repeated cycles of unlawful acts including: mail/wire fraud (e.g., secret "gatekeeper" orders and fraud-based decisions), obstruction of justice (e.g., forcedly faulty filings, falsified court dockets,

discarded evidence and pleadings, erased uncontested facts), and repeated direct retaliations (e.g., baseless, discriminatory, or retaliatory claims, submissions, and false representations, ambiguous/inconsistent rulings, cancelled court hearings, continuously sabotaged appeals).

58) Father notes that this “organized conspiracy” count is constructed to complement (and not replace and/or override) Father’s “Questions Presented” to the U.S. Supreme Court, i.e.,

- a) The Commonwealth of Massachusetts aims to “double protect”⁵ some citizens at the expense of revoking all protections from others, including Constitutional rights. Does “double protecting” **some** waive Constitutional protections for **all**?
- b) Do any immunities apply to an “LGBTQ+” Massachusetts when using federal “reimbursements” to subsidize forceful separation and agenda-driven extreme alienation of innocent American children from their loving American parents?

PRAYER FOR RELIEF

WHEREFORE, Father (and the class) pray for relief and respectfully request that this Court:

- A) Enter judgment in Father’s favor on the above Counts I through III of this complaint, e.g., a declaration that the Defendants violated (and/or conspired to violate) Title VI (42 U.S.C. § 2000d, *et seq.*), Title VII (42 U.S.C. § 2000e, *et seq.*), and 42 U.S.C. §§ 1981, 1983, and 1985, through the actions, omissions, policies, practices, and/or procedures complained of.

⁵ See “State Constitutional Law Declares Its Independence: Double Protecting Rights During a Time of Federal Constitutional Upheaval” by Scott L. Kafker, Associate Justice of the Massachusetts Supreme Judicial Court, as published at https://repository.uclawsf.edu/hastings_constitutional_law_quaterly/vol49/iss2/4/.

- B) Enter judgment in Father's favor on Count IV of this complaint, e.g., a declaration that the Defendants violated (and/or conspired to violate) the statutes (i.e., Counts I through III) with a manifestly organized, Civil RICO-Like (18 U.S.C. § 1962) long-term racketeering pattern.
- C) Enter an order certifying this case as a class action against the State (with the understanding that the question of whether the State Defendants deprived rights or violated the above statutes is an issue distinct from whether each particular plaintiff is entitled to relief).
- D) Enter an order declaring that Father (and the class) were injured, harmed, and their rights deliberately violated (and/or conspired to be violated) by Defendants' unlawful activities.
- E) Enter an order enjoining the Defendants from their unlawful activities.
- F) Enter an order awarding general and compensatory damages for discrimination & violations of federal constitutional and statutory rights and pain and suffering, all according to proof.
- G) Enter an order awarding punitive damages, if applicable, according to proof.
- H) Enter an order awarding attorneys' fees, costs, interest, and expenses (or *pro se* equivalents) pursuant to 42 U.S.C. §1988 and other relevant statutes.
- I) Enter any other order or further relief that the Court may deem fair and proper.

DEMAND FOR JURY TRIAL

Father demands a trial by jury on all claims triable.

CERTIFICATION AND CLOSING

Under Fed. R. Civ. P. § 11, I certify to the best of my knowledge, information, and belief that this complaint (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the

factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Signed under the pains and penalties of perjury.

January 5, 2026,

Respectfully submitted,

/s/ Imre Kifor

Imre Kifor, Pro Se

[demolished house mailbox]

(mailbox only, house torn down)

Newton, MA 02464

ikifor@gmail.com

(857) 340-8699

(by the federal Lifeline program)

I have no valid driver's license

I now sleep in a homeless shelter

<https://www.youtube.com/@ImreKifor>