

EXHIBIT - 2

Renewed RICO Complaint

Imre Kifor

[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>

September 8, 2025

Director Kash Patel

FBI Headquarters

935 Pennsylvania Avenue, NW

Washington, D.C. 20535-0001

IMRE KIFOR'S 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 & SUSTAINED CIVIL RICO (18 U.S.C. § 1962) CONSPIRACY - WITH ITS PROHIBITED ACTIVITIES

I, Imre Kifor ("Father"), respectfully state as follows:

1. The herein renewed and substantiated "citizen complaint" is the continued manifestation of Father's repeatedly ignored federal claims, with his now fourth petition for a writ of certiorari (No. 24-7282) to be decided by the U.S. Supreme Court on 9/29/2025 (see attached notices).
2. All aspects of the claimed violations of Title VI/VII of The Civil Rights Act of 1964 (42 U.S. C. §§ 2000d/e, *et seq.*) have been adequately addressed in Father's still to be amended federal "Complaint for Declaratory and Injunctive Relief and Damages" docketed in the U.S. District Court, District of Massachusetts, Boston Division (No.1:25-cv-11831-AK, see also attached).

3. Therefore, only the sustained and systemic conspiracy to violate Father's due process and equal protection of the laws constitutional rights -- with a long-term, endlessly repeated, and concisely manifested/organized racketeering pattern -- is addressed in the herein complaint.
4. The matter is also summarized by the attached culmination of Father's 500+ letters sent to state and federal officials, titled "Forced Fatherlessness Is The Manifested Objective Behind The Child-Predatory 'Feminism' And Profiteering 'LGBTQ+' Dual Discrimination Schemes In Today's Agenda-Driven Massachusetts" and mailed to The White House on 11/10/2024.
5. Accordingly, Father intends to conclude all his raised issues with his TBD letter and federal affidavit mailed to President Trump on 9/15/2025 and titled "Concise Proof And Manifested Mechanism Of A Marxist-Inspired And 'Governmental Ineffectiveness'-Based Deeply Child Predatory 'LGBTQ+' Profiteering & Racketeering Scheme By Massachusetts -- **How Many Hundreds Of Thousands Of Fraudulently 'Maximized' Dollars Have Been Federally 'Reimbursed' To Massachusetts On Behalf Of Our Children, Only To Collect \$0.71?"**
6. On 9/26/2024, the Massachusetts Supreme Judicial Court ("SJC") ordered that "The court will grant leave if [Father] demonstrates that he has no other adequate remedy and provides the court with a record to substantiate his claim" (see "staging" docket No. SJ-2024-M026).
7. To substantiate his claims that the sustained/systemic deliberate discriminations and directly targeted retaliations (composed entirely of Mass. G.L.c. 151B, § 4 "unlawful practices," i.e., (4) retaliation, (4A) interference, and (5) aiding/abetting employment discrimination against Father) are manifestations of federal Civil RICO "prohibited activities," i.e., mail/wire fraud, purposefully organized obstruction of justice, and repeated retaliations, Father assembled his meticulously collected and preserved evidence into his "SJC Record" or No. SJ-2025-M006.

8. For consistency, Father reiterates that the recurring Defendants in all of his complaints are:
- 8.1. THE COMMONWEALTH OF MASSACHUSETTS (official capacity), Office of the Attorney General, One Ashburton Place, 20th Floor, Boston, MA 02108;
 - 8.2. (Former Attorney General and) GOVERNOR MAURA HEALEY (official capacity), Mass. State House, 24 Beacon St., Office of the Governor, Boston, MA 02133;
 - 8.3. ATTORNEY GENERAL ANDREA JOY CAMPBELL (official capacity), Office of the Attorney General, One Ashburton Place, 20th Floor, Boston, MA 02108;
 - 8.4. COMMISSIONER GEOFFREY E. SNYDER (official capacity), Massachusetts (“Mass.”) Department of Revenue, Child Support Services Division (“DOR”), 100 Cambridge Street, 5th Floor, Boston, MA 02114-9561;
 - 8.5. MIDDLESEX PROBATE AND FAMILY COURT (“Family Court”), i.e., [REDACTED] [REDACTED] (official capacity), Probate and Family Court Administrative Office, 3 Center Plaza, Suite 210, Boston, MA 02108;
 - 8.6. MIDDLESEX PROBATE AND FAMILY COURT, i.e., [REDACTED] [REDACTED] (official capacity), Probate and Family Court Administrative Office, 3 Center Plaza, Suite 210, Boston, MA 02108;
 - 8.7. [REDACTED] (“CCNE,” now [REDACTED] [REDACTED], with 36 locations in MA and 13 in NH), i.e., [REDACTED] [REDACTED] (official capacity), [REDACTED] [REDACTED];
 - 8.8. [REDACTED], i.e., [REDACTED] (official capacity), [REDACTED] [REDACTED];

arise from: judicial rulings in custody and child support proceedings in the Family Court; the prosecution of those proceedings; or decisions [by the Attorney General's Office ("AGO")] not to pursue alleged civil rights claims arising out of those [Family Court] proceedings."

13. Accordingly, Father immediately appealed the Superior Court dismissal, arguing that "Had 'reverse discrimination,' see Ames v. Ohio Department of Youth Services, 605 U.S. _ (2025), been recognized by Mass. law, the precedent from Lopez v. Commonwealth, 463 Mass. 698 (Mass. 2012), would have applied, as Father intentionally constructed his essentially identical [interferences, retaliations, employment discrimination] claims against the State by following the pattern established by the [thus 'double protected'] Black/Hispanic police officers," i.e.,

"As 'reverse discrimination' has not been recognized by Mass. law, the [thus deeply child predatory 'feminist' and the profiteering 'LGBTQ+'] intentional [discrimination] scheme, **which silences and enslaves [the white male] majority for fraudulently 'maximized' federal reimbursements**, also directs the AGO, MCAD, [and all the courts] to endlessly reject Father's complaints, evidence, and even his [comprehensive &] uncontested facts."

14. Specifically, in his filed "Appellant's Brief" and its 9-volume "Combined Record Appendix," see docket No. [REDACTED] Father reiterated to the Appeals Court on 8/24/2025 that he had testified during the dedicated Title VI hearing in Family Court on 7/21/2025, asserting that:

"These were the first instances that manifestly and verifiably demonstrate how the Family Court deliberately falsifies dockets, as Judge [REDACTED]'s denials confirm the resulting 'lack of facts' on 5/8/2025. Specifically, Father's [above SJC Record] has evidence that a) his pleadings are discarded by case managers and b) his comprehensive and uncontested 437 facts are verifiably erased, repeatedly on 16 occasions, i.e., on 1/23, 1/30, 3/20, 3/31, 4/

15, and 4/28/2025. The Family Court deceptively ‘allows’ Father’s [e-filed] requests for permission to file the 77-page-long documents, only to docket a [mere two] meaningless pages. With [all] the 437 uncontested facts erased from the dockets, the Family Court is intentionally falsifying the dockets so that the 6 justices named in 12 motions for relief [from fraud on the court e-filed on 3/26, 3/31, 4/6, and 4/28/2025] can claim ‘no facts.’”

15. Significantly, in both his “Appellant’s Brief” and “Application for DAR” (filed with the SJC on 8/1/2025), Father reiterated the defining (or “operating”) context of all his complaints, i.e., Father is a white and straight (i.e., strictly non-LGBTQ+) male, and a legal immigrant from Romania, a former communist tyranny. After growing up as a deeply hated minority in the Ceaușescu dictatorship, **Father sympathizes with all minorities**. Therefore, the “LGBTQ+” label used herein refers to his elaborated claim that “as the consequences of [Pres. Biden’s 2/16/2023] Executive Order, effectively equivalent to mandating new ‘Jim Crow’-like segregation of Americans into ‘double protected with equity’ and ‘unprotected with no equity at all’ disjoint camps, the implied and Stalinist-inspired ‘American Gulag of Leftovers’ can be categorized only as a beginning for a new ‘forced deprogramming’¹ of the [Biden’s ‘garbage’]² masses.” Moreover, Father also a) reiterated that the “double protection”³ by the State is thus meaningless and ineffective, as a means for fraudulently

¹ See <https://www.cnn.com/videos/politics/2023/10/06/hillary-clinton-maga-cult-extremists-donald-trump-house-republicans-amanpour-cnntm-vpx.cnn>.

² See <https://www.cnn.com/2024/10/30/politics/kamala-harris-joe-biden-garbage-comment/index.html>.

³ 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/.

“maximizing” federal reimbursements, if the two Mothers do not perjure themselves for “the activist cause” in the Family Court, and b) documented that the two Mothers were literally (on 8/20/2019) and effectively (on 1/30 and 4/15/2025) ordered by Family Court to continue to renew their perjuries to render Father defenseless... In fact, during the 7/21/2025 Title VI hearing, Family Court demanded that Father furnish the mothers’ signatures stipulating the “uncontested-ness” of 437 comprehensive facts, i.e., that the two Mothers had deliberately committed (and continued to conceal) the attorney-assisted multi-million dollar perjuries/subornations of perjuries, also leading to the **sustained & unlawful out-of-state torturing, forced alienation, and utter “fatherlessness” of the four children.**

16. Consequently, in his petition to compel the assembly of three appeal records in Family Court (including the 7/21/2025 transcript containing his key testimony), Father diligently reiterated:

“Father has been documenting in his staging ‘SJC Record’ that the Family Court had been falsifying the [three parallel] dockets, discarding his submissions, and deliberately erasing readily verifiable, and now uncontested, 437 comprehensive facts. Father has also documented that he was unable to pinpoint the actual sabotaging acts or steps while being forced to mail in submissions. Nevertheless, as soon as the Family Court switched to e-filing -- thus implementing a proper handshake protocol via emailed receipts of the completions of individual steps -- Father started diligently collecting and monitoring all the receipts and now has a complete record of the concise proofs of the Family Court’s sustained and systemic unlawful acts of [discriminating and] retaliating against Father.”

17. Accordingly, as emphasized in Father’s “Appellant’s Brief” e-filed with the Appeals Court on 8/24/2025, **the State’s deliberate attempts to utterly invalidate claims of wrongdoing and**

commit outright “gaslighting” against a forcedly indigent Father are substantiated by the now crystallized core controversy that dominates the entirety of Father’s Superior Court case.

18. That is, the AGO knowingly deceived in Superior Court on 11/5/2024 despite the evidence:

“This case is based on [Father’s] theory that he has been subject to discrimination in divorce[, custody, and the fraudulently ‘maximized’ child support] proceedings in the [Family Court]. Part of that alleged discrimination appears to be related to documents [he] attempted to file as part of those proceedings. Specifically, [he] claims that he mailed documents to the court, but those documents ‘then disappeared with no trace before the judges reviewed his filings.’ Based on these alleged filing issues, [Father] derived an implausible theory that Family Court is perpetrating a discriminatory conspiracy against him, and so he filed a complaint with [MCAD and] the instant Motion [for injunction].”

19. Therefore, Father concluded his appeal by requesting the Appeals Court to “grant him relief from the attached orders and judgment and remand the case back to the [Superior Court] to allow Father to continue to prosecute the agenda-driven and hate-based [Mass.] G.L.c. 271A ‘Enterprise Crime,’ [i.e., the federal RICO-equivalent statutes of the state] organized against [all] straight white fathers and all legal immigrant families by the State of Massachusetts.”

20. Father’s supporting record appendix specifically documents that a) Family Court explicitly ordered Father to remove all attachments from all his e-filed material, and b) Superior Court docketed the entirety of Father’s “(Proposed) Complaint Pursuant To G.L.c. 271A ‘Enterprise Crime’” filed with the Massachusetts Attorney General’s Criminal Bureau on 1/13/2025, i.e., “The herein ‘citizen complaint’ is proposed pursuant to G.L.c. 271A, ‘Enterprise Crime,’ i.e., **Criminal enterprise activity**, the commission, attempt to commit, or conspiracy to

commit, or the solicitation, coercion, aiding, abetting, or intimidation of another to commit any of the following criminal activities under the laws of the Commonwealth or equivalent crimes under the laws of any other jurisdiction: [list emitted for brevity] or any conduct defined as a racketeering activity under Title 18, U.S.C. § 1961(1)(A)(B) & (D).”

21. To establish the concise “racketeering activity” context of all his “enterprise crimes” claims, Father quoted as follows from his included prior federal Civil RICO class action complaint.
22. Father is a white [straight] male legal immigrant (and proud U.S. Citizen) who was granted political asylum in 1986 due to his “hated” ethnic minority status from a tyrannical Romania.
23. Understanding how [all] communist tyrannies operate -- where the authorities enforce rules differently based on the subjects’ [broad] identity group memberships -- Father meticulously collected all the records of his [lengthy and parallel] court proceedings in the Family Court.
24. Father has been systemically defrauded, defamed, and stereotypically discriminated against in Family Court using high-conflict “mental health” and other **false** child-abuse fabrications, as well as frequent stereotypically demonizing proclamations & malicious “activist” falsities like: “Father is [a barbaric] Romanian” and “[**a categorically false**] rape was cost-effective.”
25. Building on his extensive [spanning 14+ years] personal experiences and excessive harm and injuries, Father has now substantiated allegations of stubbornly discriminatory, systemic, and sustained “social engineering” conspiracies and [the Civil RICO] rackets by the Defendants.
26. To retaliate against a victim and then a whistleblower, Family Court had first labeled Father “dangerous” and later engaged in his **total employment control**, i.e., the alleged “conspiracy to silence and enslave.” Specifically, Family Court has continued to commit the cited Civil RICO predicate acts while deliberately targeting, discriminating, and retaliating against the

now forcedly indigent Father as a series of specific and systemic disparate treatments (and not mere unintentional “disparate impacts”), and Father continues to suffer irreparable harm.

27. The intentional sabotaging of Father’s proper and lawful actions in the Family Court, coupled with the allowed and encouraged endlessly frivolous and fraudulent complaints for contempt against him, have rendered a [now 63-year-old] Father absolutely unemployable with the just submitted [2,710th+] compliant job applications and [\$465,000+] of in-arrears obligations.
28. Father is a “person” pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, *et seq.* (“Title VI”), and the State is a [Child Support Enforcement: Program Basics](#)⁴ (“CSE”), “recipient” of federal financial assistance. That is, federal CSE reimbursements are defined/ reported to the U.S. Congress by the Congressional Research Service (“CRS”): “The [CSE] program is a federal-state matching grant program under which states must spend money in order to receive federal funding. For every dollar a state spends... it generally is reimbursed 66 cents... Pursuant to Federal law, [Family Court] cannot retroactively reduce the [Family Court-ordered support] arrearages that a noncustodial parent owes.” Furthermore, “The CSE program provides seven major services on behalf of children: ... (3) establishment of child support orders, (4) review and modification of child support orders,” “the child support order is established administratively through the state [i.e., Family Court],” **“Federal law requires that states review and, if appropriate, adjust child support orders,”** and “effective review and modification of child support orders are important steps in ensuring that noncustodial parents continue to comply with realistic orders based on an actual ability to pay them.”

⁴ See <https://crsreports.congress.gov/product/pdf/RS/RS22380>.

29. Most significantly, “[The federal] CSE programs usually rely on one of the parents to request a modification of the child support order. It is important for parents facing ... substantial changes in circumstances to seek a modification to their order quickly so that they do not fall behind in their payments and thereby have to contend with past-due child support payments.”
30. Title VI prohibits all discriminations based on “race, color, or national origin ... under any program or activity receiving Federal financial assistance.” However, private parties seeking judicial enforcement of the Title VI nondiscrimination protections must specifically prove intentional & directed discrimination, Alexander v. Sandoval, 532 U.S. 275, 280–81 (2001).
31. Consequently, understanding how nationalistic discrimination works in communist tyrannies -- where authorities enforce rules selectively based on subjects’ identity group memberships, Father has avoided identifying his national origin with anything more than a “not Romanian.”
32. The original “Father is [a barbaric] Romanian” baseless fabrication, i.e., an insinuated reason for the “Romanian Orphans” tragedy publicized on TV, has been upheld by the Family Court since the child-predatory GAL investigations in 2011. Through years of litigation, Father has consistently informed that the U.S. had granted Father political asylum precisely because he was “not Romanian, not Hungarian, not German, etc.” -- as per denials from those countries.
33. Nevertheless, Family Court continues to restrict his ability to plead. This forced projection of baseless & stereotypical “silenced prisoner” qualities onto Father is manifested in the Family Court directly resorting to the continued & deliberate deprivation of Father’s civil rights and Civil RICO predicate act violations while also actively retaliating against his defensive steps of avoiding the now genuinely usurious debt from endlessly accumulating and by sabotaging his proper & timely appellate reviews. The U.S. District Court noted, “Put more simply, [he]

maintains that Family Court, on multiple crucial occasions, deliberately failed to notify [him] of its rulings, which resulted in [Father] not being able to appeal the same” on 11/22/2022.

34. Father desperately (but diligently) petitioned the SJC for immediate relief on 5/7/2023 with:

“The Family Court’s capricious or never communicated *ad hoc* ‘gatekeeper’ orders are arbitrary, untraceable, and unappealable (they are not based on statutes) instruments that are the definition of targeted discrimination and silencing retaliation ‘backdoors’ into the Family Court’s activist ‘legal machinery’ that Title VI was intended to prevent,” as all the meticulously documented systemic child abuses/agenda-driven parental alienations were effectively concealed when the Family Court discarded Father’s submitted filings -- while stripping him of his protecting legal custody of his children on 2/3/2014. Predictably, this occurred after **the first “gatekeeper” orders** were issued by Family Court on 12/5/2013.

35. Father has also substantiated to the SJC that docket entries continue to **not** reflect the factual reality of Father’s proper filings and the court’s orders. Father has claimed that the judicial deadlock (purpose fabricated by Family Court through the allowed fraudulent and frivolous complaints for contempt) was an endless “war of attrition” aimed at delaying investigations and denying Father’s desperate requests for relief from his thus retaliatory forced indigency.

36. Since 7/13/2022, when Father first formulated his still manifested federal “Civil RICO Class Action Complaint” in the U.S. District Court, the following material changes have occurred.

37. As substantiated by a 9-volume “Combined Record Appendix,” Father furnished the Appeals Court on 8/24/2025 with a now complete account of all court submissions as proof that the root controversy had never been the “absolute judicial and prosecutorial immunity”-bearing child custody, parenting, financial support, expenses, etc., adjudications by the Family Court.

38. Since the secret 12/5/2013 “gatekeeper” order -- deliberately concealing Father’s exhaustive “Offer of Proof” documentation submitted on 11/25/2013 --, the Family Court’s manifested objective had been to effectively erase all of Father’s preserved evidence and easily verifiable facts from his three Family Court dockets -- **only to “sanitize” them from federal scrutiny.**
39. Moreover, his SJC Record substantiated -- already on 2/10/2025 -- that proving the repeated cycles of deliberately sustained & systemic disparate treatments had been impossible before:
- a) The “NOT GUILTY (for not paying)” reversal on 2/26/2024 regarding the prior invidious “Father has had hidden Romanian assets” baseless, mere projections by the two Mothers;
 - b) The silent -- without notice -- online revelation by Family Court on 4/20/2024 of the prior **secret**, i.e., manifestly discrimination-concealing, **“gatekeeper” order from 12/5/2013**;
 - c) The SJC’s confirmation on 5/31/2024 of the implied invidious mail/wire fraud, ongoing falsified Family Court dockets, and, hence, Father's repeatedly sabotaged direct appeals.
40. These three recent “key events” together constitute the now substantiated proof for Father’s herein-stated claims. Consequently, the parallel 1/30/2025 hearings in Family Court provided the evidence for “The Deeply Child Predatory And Profiteering Reverse Discrimination (And Racketeering) By The First Lesbian Governor In Our Nation Is The Quintessential Definition Of ‘Hate Crimes’” letter/federal affidavit that Father mailed to the FBI (& DOJ) on 9/8/2025, as also documented to Gov. Maura Healey and City of Newton Mayor Fuller on 1/31/2025:
- “Yesterday’s ‘never to be repeated’ pause in both threats for arrest [and jail sentence] and **discarding of [all my] submissions** revealed the ‘Catch-22 Trap’: a) ‘He must explicitly spend money to properly file his pleadings and evidence in the Family Court,’ yet b) ‘If he spends any money, but doesn’t first pay his usurious accumulated now [\$465,000+]

of in-arrears child supports and court-ordered other expenses, i.e., a federal felony, then he must be arrested and sent to jail -- thus invalidating all his pleadings and evidence.”

41. Consequently, as these cycles of unlawful acts have continued to occur in an organized and orchestrated fashion for now 14+ years, Father has properly alleged in federal court since 7/13/2022, that a manifested pattern of Civil RICO racketeering had emerged. Accordingly, the DOR issued an “Annual Notice of Child Support Delinquency” to him on 3/7/2023, with the option to request a review. Father’s first “Request for Administrative Review” confirmed on 3/25/2023 that the parallel cases have touched the entire spectrum of the CSE program’s core services & incentive payments, in addition to the DOR’s involvement starting on 2/19/2019.
42. The DOR’s notices of delinquency confirm that the State has received financial assistance (or “Federal reimbursements”). Accordingly, Title VI applies to the CSE program’s “review and modification of child support orders” core service. Moreover, the Family Court issued further oral “gatekeeper” orders during the 3/23/2023 dual hearings. Yet, Father has no confirmation that the hearings have ever even taken place. Therefore, appealing “the orders” is impossible.
43. Despite Father’s factual argument to the SJC, e.g., “all of Father’s relevant evidence has been fully communicated and readily accessible as Father had e-filed his entire collection with the Appeals Court. Therefore, the Family Court’s ‘gatekeeper’ orders, while unappealable, serve as secretive instruments to conceal the already substantiated fraud on the court,” SJC-13427 ruled in an endlessly circular fashion on 8/8/2023: a) “to the extent he challenges the entry of interlocutory ‘gatekeeper’ orders... he could seek reconsideration of those orders” -- which is not possible in the purposeful absence of the actual orders, b) “to the extent he challenges the entry of any final order of the Family Court, he may appeal from any such order” -- which is

not possible in the purposeful absence of any final orders, and c) “to the extent [he] contends that the docketing of any order was delayed & that the appellate period lapsed in the interim, a motion under Mass. R. Civ. P. 60 (b) (1) or (6) may provide a remedy” -- which is exactly what Father has been consistently and repeatedly attempting to do since 2018, see his latest 12 motions for (comprehensive) relief e-filed on 3/26, 3/31, 4/6, and 4/28/2025, specifically pursuant to Mass. R.Civ.P. Rule 60 (b) (6), i.e., all the deliberate and thus concealed Rule 60 frauds on the court, and the Massachusetts Probate and Family Court Standing Order 2-99.

44. Father also claimed in his “Petition For Panel Rehearing Pursuant To Sustained 42 U.S.C. §§ 1981, 1983, & 1985 Violations” to the U.S. Court of Appeals, First Circuit (“USCA1”), that:

“The [SJC’s] 8/8/2023 decision to once again fully ignore all of Father’s timely and properly e-filed substantiating evidence, even regarding an explicit conspiracy and racketeering for the concealment of a Rule 60 fraud on the court by Family Court, is a new direct violation of Father’s constitutional rights for free speech (i.e., 'to petition the Government for a redress of grievances'), due process (i.e., no ‘gatekeeper’ orders or the repeated preclusions of all rightful appeals), and equal protection (i.e., no ‘equity-based’ discrimination due to race, sex, gender, and national origin). Father also argues that the timing of the 8/8/2023 decision, e.g., right after this [USCA1’s] 8/4/2023 abandonment of its months-long protection of Father’s constitutional civil rights by yielding to the [thus falsely asserted ‘sovereign immunity-wielding’] State, is a materially significant factor.”

45. The Erie doctrine is a binding principle where federal courts exercising diversity jurisdiction to apply federal procedural law must also apply state substantive law, “in all cases where a federal court is exercising jurisdiction solely because of the diversity of citizenship of the

parties, the outcome of the litigation in the federal court should be substantially the same ... as it would be if tried in a State court,” Guaranty Trust Co. v. York, 326 U.S. 99, 109 (1945).

46. Consequently, the SJC-13427 decision on 8/8/2023 also confirmed that Father’s repeated requests for either interlocutory or final appeals of prior orders and his “Motions for Relief Pursuant To Rule 60 Fraud On The Court” are thus, according to the State’s substantive laws.
47. Father states that Family Court and State, in an explicit and deliberate collusion, are targeting and retaliating against Father a) based on his race, sex, and national origin, b) with the herein alleged conspiracy to silence and enslave, and c) in a now substantiated existential and age-based “war of attrition” -- by ignoring Father’s complaints until his time ultimately runs out.
48. Specifically, the objective of these activities is to continue to delay and obstruct decisions on Father’s modification complaints, pursuant to conditions of the Federal CSE reimbursements, until he becomes silenced and enslaved (or “expired enough” from complaining any longer).
49. Father’s pending lawsuits in the Family Court are specifically about the consequences of the ongoing systemic conspiracy to silence and enslave him -- by deliberately violating Father’s constitutional rights only to conceal and obstruct the now substantiated Rule 60 fraud on the court and the thus subsequently committed deliberate federal Civil RICO “prohibited acts.”
50. Accordingly, after his 11/12/2024 “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” was denied, Father immediately requested in his “Petition For Rehearing En Banc” filed with the USCA1 on 12/2/2024, i.e.,

“Father respectfully requests this Court to grant Father’s petition for rehearing to prevent the abuse of discretion by the U.S. District Court (amounting to deliberate anti-immigrant

discrimination and the subsequent retaliations) from further metastasizing to other courts with the manifest objective to subvert the doctrine of judicial estoppel and then to cause Marxist-inspired ambiguity and inconsistency [-- always necessitated by the ‘agenda’].”

51. Moreover, Father also identified on 11/12/2024 how the Marxist-inspired “ambiguity and inconsistency” -- through the always fluid/changing “equity-based” social justice --, fosters the specific anti-immigrant discriminations and all subsequent directly targeted retaliations:

“Father respectfully requests this [USCA1] 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** [all] the legal immigrant men as mere ‘Biden’s garbage’ -- by erasing their evidence and systemically nullifying their complaints; and b) declare that President Biden’s 2/16/2023 Executive Order is unconstitutional as it deceptively intends to foster the above discrimination by the states against predominantly male immigrants.”

52. CRS asserts and documents in the Child Support Enforcement Program Incentive Payments - Background and Policy Issues (5/2/2013): “Individual states have to compete with each other for their share of the capped funds ... payment system requires that the incentive payment be reinvested by the state into the program ... penalties may also be assessed when the calculated level of performance fails to achieve a specified level or when states are not in compliance.”

53. CRS also documents in the Demographic and Socioeconomic Characteristics of Nonresident Parents (10/18/2021): “A majority of nonresident parents (5.4 million) reported paying child support in 2017... and the estimated total amount paid in child support was \$33.8 billion...”

nonresident parents were disproportionately likely to be male... in 2018 the majority of parents were white, non-Hispanic, including 54% (5.2 million) of nonresident parents.”

54. **Enterprise.** This complaint refers to the “association in fact” between Family Court, also including its practicing attorneys or “trusted officers,” its Guardian ad Litem (“GALs”), its supervised visitation centers, etc., and the other Defendants as a legitimate RICO enterprise.
55. This Enterprise has (1) a shared purpose of investigating, determining, and enforcing child support payments (and then collecting the federal reimbursements); (2) a charter, continuity, and longevity of its structure; and (3) all the members depending on and working in concert/coordination with each other to pursue the shared interest (incentivized by professional fees).
56. The members of this Enterprise are banded together to perform the above multifaceted tasks that they could not achieve on their own. The level of cooperation among the members in this Enterprise is above the level inherently present in all other regular commercial transactions.
57. Family Court is the *de facto* “hub” of this Enterprise, with all the other Defendants being the service provider “spokes.” This coherent group “works” together, with the members knowing the general nature of the Enterprise and that it extends beyond each member’s separate role.
58. This Enterprise is, by definition, more than any corporate defendant carrying out its ordinary business through a unified corporate structure unrelated to the racketeering activity presented below. RICO was designed to prevent any such illicit infiltration of legitimate enterprises.
59. **Objectives.** The State publicly seeks to maximize federal reimbursements (despite potential harm and injury to taxpayers): “Federal receipts associated with the child support computer

network shall be drawn down at the **highest possible** rate of reimbursement ... as reported in the state accounting system for federal incentives and the network ... \$38,887,046.”⁵

60. Between 2012 and 2022 a total of \$33M + \$35M + \$35M + \$37M + \$34M + \$29M + \$28M + \$30M + \$34M + \$38M + \$38M = \$371M federal reimbursement amounts were reported.

61. Competing against all other states, this can be accomplished only by (1) targeting families with more resources, (2) maximizing each support amount by forcefully and fully separating children from their nonresident parents, (3) allowing fabrications of “high-conflicts” into the cases only to incentivize the “feeder network” of colluding professionals, (4) hiding the thus induced legal struggle by “cooking” the docket records, and (5) concealing any wrongdoing with protecting schemes from discovery, or appeals, and federal penalty inducing corrections.

62. **Interstate Commerce**. By the definition of this Enterprise, as it aims to “maximize” federal reimbursements (and their subsequent reinvestments in a positive feedback loop), the RICO interstate commerce requirement is satisfied by its direct effect on this “federal” commerce.

63. The American Bar Association asserts: “It is estimated that only 10 percent of family law disputes end up going to trial, whereupon they take up the lion's share of work for family courts. One might assume that these rare cases exclusively involve highly complicated divisions of property or particularly irregular custody disputes. Instead, a significant percentage of the most fractious family law cases do not involve complex legal issues, but rather they involve individuals who appear to be bafflingly unable to resolve their disputes.”⁶

⁵ See <https://malegislature.gov/Budget/FY2022/FinalBudget> at 1201-0160.

⁶ See https://www.americanbar.org/groups/family_law/publications/family-law-quarterly/volume-53/issue-2/confronting-challenge-the-highconflict-personality-family-court/.

64. The layman Father contends that law professionals with “no skin in the game,” yet obscenely lucrative incentives, are not just biased against American families but are also concealing the facts. Through this 14+ years-long pattern of “high-conflict” inducing “mental health” fraud, defamations, and discriminations, combined with the herein documented RICO schemes of concealment and retaliation, he lost \$1M+ in “legal fees” as part of his \$10M+ in damages.
65. **Racketeering Activities.** This complaint refers to allegations of § 1961(1) obstruction of justice (and of state or local law enforcement), mail (and wire) fraud, and retaliation against a victim (and informant) as the offenses or “predicate acts” of the RICO racketeering activities.
66. Pursuant to Fed. R. Civ. P. § 9 (b), the herein pleadings of fraud have time, place, parties, and content of the misrepresentations specificity, showing the deception by the communications.
67. The scheme behind the intent of the Racketeering Activities was to deceive a prepared Father in his affirmed efforts to appeal the Family Court’s decisions, and conceal from, and sabotage any appellate reviews of his filed evidence and/or docket entries. Mails and/or wires (internet and emails) were used to further this deception scheme with “property in Father’s hands.”
68. With severely restricted public access to Family Court’s docket entries, Father’s only option was to learn from and rely on mailed (or emailed) decisions when attempting to appeal them.
69. The Family Court also had a duty to disclose its decisions. Yet, on multiple crucial occasions, Family Court deliberately omitted to notify Father altogether (allegedly to preempt appeals).
70. Father's relentless diligence, e.g., filing pleadings, affidavits, and exhibits throughout the 80+ hearings, was countered by Family Court’s fraudulent concealment. This occurred through active misleading with affirmative steps or conduct (e.g., banning him from filing pleadings).

71. **Racketeering Schemes**. Multiple racketeering schemes have been deployed to silence and enslave Father, directly and/or proximately causing Father's injuries and pecuniary damages:
72. Secrecy Scheme: by not notifying him, Family Court preempted Father's chances of appeal (one cannot appeal an unknown ruling); Deception Scheme: deliberately asserting falsities in mailed orders caused confusion (and inordinate amounts of effort to correct); Ignore Scheme: Family Court ignored Father's verified submissions (to keep public records consistent with fraud); Retaliate Scheme: Family Court allowed or fabricated ambiguous contempt actions to keep Father under the endless threat of silencing jail sentences; and Usury Scheme: Family Court deliberately forced usury rates on a thus forcedly indigent Father only to enslave him.
73. By keeping docket records inconsistent with reality and by fabricating contempt actions to retaliate against a whistleblower Father, Family Court turned the wrongs into self-concealing.
74. **Patterns of Racketeering**. These Racketeering Activities started ~10 years before the first claims and continued through related acts, thus forming § 1961 (5) patterns of racketeering.
75. All the acts have the same or similar purposes, results, participants, victims, and methods of commission, or they are interrelated by specific characteristics and are never isolated events.
76. The patterns are open-ended schemes in that they have been [a now] ten-plus-year-long chain of related misconducts with a well-established threat of continuity. Despite Father being the only targeted person, 2 colluding Mothers, 3 independent Family Court dockets, 4 separate GALs, 9 consecutive judges, 21 doctors and therapists, and over 30 lawyers were involved.
77. Moreover, multiple simultaneous schemes have been active at all times. It is thus alleged that **the intention had been to silence and enslave**. Patterns of unlawful conduct exist with (1)

many predicate acts, (2) of differing variety, (3) over [now] ten-plus-year-long period, (4) on multiple parallel (split) victims, (5) through separate schemes, and (6) with distinct injuries.

78. As adjudging complaints of contempt re: in-arrears child supports are part of Family Court's regular way of conducting its business (with the deliberately forced indignities and fabricated child-predatory ambiguities aside), the threat of open-ended continuity, i.e., "all past conduct that by its nature projects into the future with the threat of repetition," continues to persist.
79. There is no reason to suppose that any of the alleged misconducts by the Family Court (e.g., retaliations & preclusions of appeals) would not continue indefinitely without this complaint.
80. Family Court's duties and the regular way of conducting business also satisfy the "vertical relatedness" criteria, as Family Court was enabled to commit the offenses solely because of its position in the Enterprise and its involvement in and control over the Enterprise's affairs.
81. For completeness' sake, "horizontal relatedness" exists and is proven by the predicate acts having similarities in purposes, results, participants, victims, and methods of commission.
82. A whistleblower Father exposed the underlying wrongdoings. Relatedness requirements are thus satisfied as Family Court's retaliatory acts are inherently connected to those schemes.
83. **Culpable Person**. Family Court is a member of the larger Enterprise as an entity capable of holding a legal or beneficial interest in a property. As a trial court, Family Court has "under the color of the law" jurisdiction and proper duty to manage and operate the various actors involved in the different, and therefore distinct, events of the above legitimate Enterprise.
84. RICO claims may be appropriate against government employees who commit predicate acts.

85. By pretending to be an appeals court (i.e., **denying appeals without appellate jurisdiction**), the Family Court has deliberately abrogated its “absolute judicial immunity” only to become a RICO culpable person, ensuring that distinction exists between the Enterprise and Patterns.
86. Moreover, as all of the above-cited RICO predicate acts were deliberately committed to a) discriminate (and later retaliate) against Father based on his race, sex, gender, and national origin, and b) deprive his constitutional civil rights only to knowingly conceal a substantiated set of Rule 60 frauds on the court, the State has also had its sovereign immunity abrogated.
87. **Injuries**. Father is (1) a person (2) who sustained an injury (3) to his business or property (4) because the Defendants violated 18 U.S.C. § 1962. The RICO violations and Father's harm and injuries are independently alleged. Therefore, he has standing for the Civil RICO claims.
88. Father has realized economic injuries from the herein interferences in his business/property.
89. The now forcedly indigent Father’s significant financial and existential losses are concrete.
90. Father’s injuries are also ascertainable and definable because he has been deprived of his ability to use or to transfer his now sole remaining property, his saved intellectual property.
91. Father’s injuries have all been foreseeable and natural consequences of the herein schemes.
92. Father’s licenses were suspended on purpose. Family Court then deliberately ordered Father to seek unskilled work (i.e., requiring mandatory physical transportation). The thus forcedly indigent Father was later sentenced, and his pecuniary losses due to false imprisonment were discrete injuries to his business or property (that were not derivative of any personal injuries).
93. Father’s access to the timely appeals processes (Mass. G.L.c. 215 § 9) was repeatedly denied without explanations by the Family Court, and Father suffered injuries to this property right.

94. Even the Chief Justice of the Family Court wrote on 3/6/2019: “If you believe that a final decision in your case is legally wrong, you may have a right to appeal the decision. There is also a right to appeal some types of orders that are not final, called interlocutory orders.”

95. The still pending parallel petitions in the Single Justice Appeals Court, No. 2025-J-595/596, substantiate Father’s reiterated claims of sustained sabotage and systemic subversion -- by a concealing-agenda-driven Family Court -- of the above clear rights to appeal. Specifically,

“Pursuant to G.L.c. 231, § 118 (first paragraph), [Father] respectfully and simultaneously petitions this Court for relief from the [Family Court’s] attached parallel decisions by Judge [REDACTED] mailed on 8/1 and 4/2025. [He] filed his parallel notices of appeal in Family Court on 5/16 and 19/2025, see ‘Combined Record Appendix.’ Father also filed a notice of appeal in his related Middlesex Superior Court matter on 5/28/2025. The Superior Court appeal is docketed, see the [REDACTED] docket entries attached [, with Father’s ‘Appellant’s Brief’ already docketed on 8/27/2025]. Addressing the Family Court’s delay in assembling the record for the appeals, Father reiterated in his [denied] ‘Motions To Compel Family Court To Docket Submissions, Update The Dockets, And Mail Decisions’ on 7/30/2025 [that he] ‘started diligently collecting and monitoring all receipts and now has a complete record of concise proofs of the Family Court’s sustained and systemic unlawful acts of deliberately discriminating -- and then retaliating against Father... For this reason, the 7/21/2025 transcript provides the key testimony on the claimed ‘hate-based organized racketeering against straight white fathers and legal immigrant families in Mass.’ WHEREFORE, Father respectfully requests this Court to review the attached parallel records and compel Family Court to properly docket all submissions, update the

dockets, and assemble the record for appeal (including the 7/21/2025 transcript containing the key testimony) so that an appeals panel can finally review the cases.”

96. RICO injuries are the ones “by reason of” RICO violations, requiring direct relation (i.e., factual and proximate causations) between injuries asserted and injurious conduct alleged.
97. The Defendants’ systemic and sustained wrongful conduct directly caused Father’s economic losses, as the, therefore intended consequences of all the Defendants’ thus unlawful behavior.
98. RICO injuries cannot be mere reaffirmations of previous acts. Father’s business and property are directly contextualized and encapsulated by Father’s software startup, Quantapix, Inc.
99. The June 2011 inception of the one-person company coincides with the start of the lawsuits in Family Court. Father’s injuries to his business and property are tracked by his meticulous corporate records (all e-filed in court), showing direct causations other than “market factors.”
100. Father’s business/property (e.g., his professional reputation & ability to gain employment) has been directly damaged by the **false public allegations** about his “mental health,” “rape, battery, violence, etc.,” “child abuse,” “financial control,” and generic “toxic” masculinity.
101. To escalate the child-predatory conflict to the limit, Family Court assigned notoriously cruel “high-conflict” expert GALs (the activist “feminist” Harvard psychologists Drs. Deutsch and Olezeski) to one of the cases to custom fabricate dogmatic and infantile crude narratives like: “[Twin] is afraid the Father will ‘put suction cups on her feet and take her out the window,’ and [twin] is afraid Father would ‘put him in boiling water’ if he went back in Father’s care.”
102. As the biased GALs refused to consider the submitted extensive evidence (e.g., that directly contradicted their existing, boiler-plated “binary victim” scripts, i.e., “Mother-B either lacks

affect or was bullied into abandoning her 3.5 yo Twins”), the “superstar” GALs’ scheme of stereotypically targeted massive invalidations was obscenely profitable for them at ~\$55K.

103. Family Court’s assignment of the parallel GAL investigation (of effectively identical facts and events) to a balanced, but later bullied-in-court, Dr. Somers cost ten times less, at ~\$5K.

104. Consequently, Father had 500+ supervised visits with his four children without any raised complaints. Moreover, out-of-state companies, i.e., the Defendant CCNE, were used as the informed, and “interstate-commerce”-applying, Civil RICO conspirators. CCNE enabled the “LGBTQ+” State to retaliate against Father -- and crushingly interfere with his civil rights -- by deliberately and forcefully alienating his older Twins, despite that such “extreme parental alienation should be considered emotional child abuse and referred criminally.” Using the out-of-state services, knowingly referred to by Defendant Atrius Health, the State verifiably induced the same **agenda-driven forced “fatherlessness”** in Father's older Twins, as was confirmed by the Family Court’s probation officer in his younger Siblings on 1/10/2024.

105. CCNE’s “torture-children-on-demand” services allowed the State to turn the four children’s Marxist-inspired “brainwashing” against their father, untraceable in the State’s courts, while also combining it with unlawful and out-of-state forced medicating of the helpless children.

106. Accordingly, Father summarized the clear abuses of judicial discretions -- that underlie the 2/13 and 6/30/2014 parallel judgments --, as the Family Court deliberately overruled: 1) even the two Harvard GAL’s ultimate admission of factual errors; 2) the three Harvard professors and therapists’ **joint conclusion that Father “presented no danger to his children”**; 3) the attorneys’ now substantiated collusion to defraud the Family Court itself; 4) the verifiable record of Father’s and his family’s political asylum in 1986 (i.e., no “hidden foreign assets”);

and 5) that the three Harvard Medical School medical doctors/professors professionally wanted nothing to do with the Family Court's deeply child-predatory pure profiteering.

107. **Classes of Injuries**. Father's injuries stem from (1) committed predicate acts -- or 18 U.S.C. § 1962(c) violations; (2) the investment of racketeering income -- or § 1962(a) violations; (3) the acquisition of an interest in and/or control over the Enterprise -- or § 1962(b) violations; and (4) overt acts committed in furtherance of the conspiracy -- or § 1962(d) violations.

108. § 1962(c) deception and retaliation violations of the "to silence and enslave" punishments are the (thus without jurisdiction) causes of Father's realized injuries (as they simultaneously remove any chances of judicial reviews and reparations) while also deliberately forcing him to succumb to sustained monetary injuries, as recovery is impossible from a **\$465,000+** debt.

109. § 1962(a) statutory reinvestment violations of previously received federal reimbursements have provided Family Court with limitless resources for its comprehensive "war of attrition" on Father -- to silence and enslave him --, despite his supposedly "protected" indigent status, i.e., ordering the soon after accepted indigent Father to jail for inability to pay on 10/21/2019.

110. § 1962(b) acquisition violations have provided Family Court with the means to expand the "feeder network" of professionals who would steadily supply fraudulently obtained "expert" or "trusted" opinions (in exchange for the thus allowed obscene profiteering opportunities) with a child-predatory "baiting and provoking a dedicated & loving parent" activist agenda.

111. § 1962(d) conspiracy violations have allowed Family Court to expand the sphere and the intensity of attacks and retaliations on Father without sacrificing its judicial and/or sovereign immunity. The repeated filings of the frivolous complaints for contempt, and the paid arrest on 1/21/2022, can be attributed to the two conspiring and financially incentivized Mothers.

112. Father was not the direct recipient of false statements when the Mothers repeatedly filed their complaints. The Family Court's subsequently mailed orders coerced him to obsessively "seek work" (via 10+ submitted job applications/week), proximately causing his now **2,710+** rejected or ignored solicitations for work as he could not withhold his "pending legal issues."

113. Father's now completed 9-volume "Combined Record Appendix" proves that Father's key pleadings & **437 comprehensive/uncontentested facts** are never considered in Family Court -- thus deliberately denying Father's due process and equal protection rights on 1/30, 4/25, & 7/21/2025 --, while relying on the agenda-driven, baseless, discriminatory/retaliatory, and malicious anti-immigrant fabrications. Accordingly, Father has now substantiated that, as the ultimate objective all along had been to conceal (and to collude to conceal) the allowed (and even encouraged) originating **\$1,000,000 perjury** and the subsequent endless child abuse,

"Filing anything with the Family Court at this point is futile for [Father] since [Family Court] manifestly falsifies all of [his] submissions while pretending to accept them -- only to satisfy the '**collateral orders**' of safeguarding the flow of agenda-driven 'maximized' federal reimbursements at all costs, even at the high cost of deliberately committing sustained and systemic Title VI/VII civil rights violations, as now 'reverse discriminations' -- based on [Father's] race, color, sex, gender, and national origin."

114. Similarly, Father's SJC Record also demonstrates that the Family Court has an ulterior or "collateral" motive, i.e., to avoid federal penalties at all costs and forcefully maintain the fraudulent *status quo* of the 3 parallel dockets. The Family Court's priority, therefore, can only be achieved if all, even the 437 comprehensive and uncontested facts, are erased from

the three dockets. Consequently, the Superior Court has manifestly colluded with the State in effectively also erasing all of Father's evidence and facts -- only to "sanitize" the dockets.

115. **Collection of Unlawful Debt**. The initial child-abusive lawsuits were filed simultaneously by Mothers. Due to false statements to the police, DCF, etc., they had fraudulent pretenses.

116. Therefore, the Family Court awarded child support to only Mother-C in 2011. As Father had been his Twins' sole (and full-time) custodian for the prior four years, Family Court falsely imputed an income for him. That amount was later reduced. Mother-B was awarded support only in 2014 after Father's custody was stripped following the secret "gatekeeping" orders.

117. Family Court formulated the speculatively imputed off-and-on child supports in a deceptive "gambling" style based on discrimination and deliberate & systemically fraudulent finances.

118. Since DOR's 2019 involvement, Family Court relied on weekly mailed demands to collect the "unlawful debt" as an aggravated federal felony threat, aided by the Mothers' conspiracy.

119. The forcedly indigent Father had diligently attempted to modify the ordered ~\$5,000/month obligations for his 4 children since 2018, with the now **11th** such attempt filed on 4/28/2025.

120. To avoid appellate reviews (w/ potential penalties), the Family Court has resorted to RICO predicate act violations. Specifically, the Family Court directly sabotaged Father's defensive steps to avoid the usurious, now \$465,000+ debt from accumulating. And then Family Court immediately retaliated against Father when he started filing his complaints in other courts.

121. Despite Father's repeated requests for various reviews (of alleged and/or directly implied deceptions & retaliations by Family Court), both DOR & the State continued to collude with Family Court's ongoing and now fully substantiated predicate act violations. Specifically, the

DOR stubbornly maintains a large discrepancy in Father's total owed obligations by entirely ignoring the Mother-B matter and partially ignoring (2018 to 2019) the Mother-C matter.

122. **Statutes of Limitations**. Father first learned about his injuries from the trial testimonies (and prior depositions) of Dr. Deutsch, Mother-B, and a police officer. Despite the police officer's justification for not arresting Father (due to inconsistencies in Mother-B's story); the "bullied" Mother-B's suborned perjury about her millions of dollars extorted from Father; the GAL's deliberate deceptions (and her later "inability" to recall details of the investigations); etc., Family Court secretly still proceeded to block Father's diligent efforts for self-defense.
123. Specifically, Father's submitted **110-page affidavit of 973 verifiable errors** in the GALs' reports was immediately discarded and quietly buried by Family Court despite Dr. Deutsch's testimony that she had directly relied on Dr. Olezeski's (now at Yale) defective, biased, and sex-obsessed "psych testing" to conclude the activist "possible personality disorders" claims.
124. Family Court (and the conspiring Mothers) continued to use this "mental health" fraud and defamation against Father to this day, despite his filing of repeated psychiatric evaluations by three Harvard clinical psychiatrists (seniors & superiors of the "activist" psychologist GALs).
125. The Family Court's unambiguous ruling, "On **December 5, 2013**, the Court denied Father's request to submit additional evidence. The Court provided the following rationale: I specifically find that the value of any evidence received from mental health treaters is outweighed by the prejudice which would be supposed by [mother] in light of [Father's] prior vigorous assertion of privilege and [the Mother-B's] inability to conduct discovery regarding such witness(es)," marks the **first** occurrence of the stream of RICO predicate acts.

126. Supported claims show that the “impounded” information was fraudulently concealed, as Father could not discover the facts nor appeal the subsequent decisions despite his diligence.
127. Father argues that the statute of limitations is to be equitably tolled because he first learned about the official justifications of the causes of prior injuries from these faulty, inconsistent, and secret Family Court docket entries served on him by the Assistant AG only on 8/9/2021.
128. While Father was aware of the injuries to his business or property (due to defamatory and discriminatory after-effects of the fraud-based police, DCF, GAL, etc. investigations), Father still could not discover the pattern necessary to overcome the immunities of the bad actors.
129. A disconnected pattern only started to emerge when two medical doctors (Drs. Goldsmith and Kurens from Atrius Health) openly conspired to forcefully medicate (and brainwash) his traumatized children (as a “protection” from Father’s **projected** “toxic masculinity”) while sending the Twins into the years-long colluding “care” of out-of-state doctors (Drs. Lawson, Gallagher, Tempesta, Katragadda & Magee) at the Defendant CCNE, in Nashua, NH.
130. **Diligence Efforts**. To resist Father, they demanded that Family Court strip Father’s legal custody of his Twins on 4/22/2013, lest they would “refuse to continue treating” the children.
131. Proof of Father’s relentless diligence efforts in court is the Family Court’s specific orders to severely restrict his filings (12/5/2013, 8/24/2018, 1/11/2019, 4/24/2019, 3/7/2023, etc.) and to ban his public complaints (9/26/2018, 4/11/2019, etc.), resulting in his now 500+ desperate open letters/affidavits to top officials, relevant government agencies, the U.S. Congress, etc.
132. To further provoke the fabricated custody matters for court purposes, while using fraudulent medical insurance to remove traces of accounting, Dr. Goldsmith knowingly forced Father’s Twin to also undergo an unnecessary but painful “cancer” surgery at Mass. General Hospital.

133. Witnessing the little boy's **deliberate and cruel, agenda-driven medical torture**, Father withdrew legal consent from the Defendants Atrius Health and CCNE to treat his children.
134. The statute of limitations clock is not affected by these discoveries. As only the necessary other elements of the patterns were uncovered, proximately caused injuries were left intact.
135. **Injury Discovery**. Pursuant to this rule, Father was first injured by the first predicate act on 12/5/2013 when Family Court omitted mailing the above, thus, **unappealable denial**. Father learned about it only after 6/30/2014. Therefore, any simultaneous appeal of the parallel and colluding cases became predictably impossible (as the other judgment was dated 2/13/2014).
136. Federal law holds that limitation periods cannot begin until the cause of action is complete.
137. Father's cause of action was completed only on 8/9/2021, when he learned from AGO that the 12/5/2013 secret denial was recorded in the Family Court docket entries 6+ months after it could have been appealed, rendering the omitted mailings deliberate obstruction and fraud.
138. Father alleges a fraudulent direct obstruction, as (1) Family Court actively and wrongfully concealed material facts relating to the wrongdoing; (2) the concealment prevented Father's discovery of the nature of the claims within the limitations period; and (3) Father exercised relentless due diligence in pursuing the discovery of the claims during the to-be tolled period.
139. Confirmed proof of Father's forced unemployability arrived only on 6/3/2022 when Family Court dismissed (with a canceled hearing) its **secretive complaint for contempt** as Father had unconditionally complied with the Family Court's all obsessive "seek work" orders.
140. The "preclusion of appeals" pattern was discovered when Father's first notice of appeal (filed on 7/1/2019) was ignored by Family Court. It has existed since then through 9 out of

11 systemically ignored Notices of Appeals, all properly/timely filed on 7/1/2019, 11/7/2019, 1/7/2020, 2/12/2020, 6/24/2021, 6/29/2021, 7/18/2021, 8/18/2021, 8/25/2021, respectively.

141. Father's signed affidavits of indigency accompanied all his submitted "Notices of Appeals."

142. The "preclusion of appeals" pattern was also verified by the Appeals Court on 6/23/2022 by noting, "As described infra, we consider only the appeals from judgments that are properly before us: the denial of [Father's] motion for reconsideration in the Probate Court action with [REDACTED] and the June 4, 2021 order and June 23, 2021 dismissal in the Probate Court action with [REDACTED]. It was confirmed that crucial judgments of the cases (that all subsequent contempt actions build on) are effectively unappealable, regardless of Father's proper/timely repeated efforts, due to the Family Court's deliberate sabotaging of the appeals processes.

143. Significantly, the SJC alerted Father on 5/31/2024, i.e., "There appears to be no reason why [Father] could not have pursued a direct appeal from the denial of the trial court motions (also a point made by the Appeals Court single justice). That is [Father's] remedy," that his "Notice of Appeal," properly and timely filed on 3/17/2025, was ignored by Family Court.

144. Once again, Father diligently reiterated to SJC-13427 that "all of Father's relevant evidence has been fully communicated and readily accessible as Father had e-filed his entire collection with the Appeals Court. Therefore, Family Court's 'gatekeeper' orders, while unappealable, serve as the secretive instruments to conceal the already substantiated fraud on the court."

145. The continually repeated RICO predicate acts, e.g., retaliations and mail (and wire) fraud, as well as the (secretly) obstructing "gatekeeper" orders, not just directly infringe upon but also deny Father's due process and equal protection constitutional rights for in all his existentially significant interactions with the activist, and thus "under the color of law"-discriminating,

Family Court. Specifically, not knowing if Father's filings and relevant evidence are ever even considered, and then being utterly unable to find out about any of the later decisions, is precisely what the herein allegations of conspiracy to silence and enslave intend to convey.

146. Specifically, the whistleblower Father has alleged ongoing stereotypical discrimination by the Defendants. On 12/6/2021, the Family Court ordered Father to start all his employment relationships by directly compromising himself and **deliberately withholding** his materially significant and verifiable "pending legal issues." The intent behind the now substantiated conspiracy to silence and enslave is also clear: the obsessive "seek work" orders would either silence Father by deliberately forcing him into jail (via involuntary "contempt") or enslave him without any escape (via garnishing all his wages as per the 1/21/2022 "proposed order").

147. Father has now documented that the docket entries in Family Court do not reflect the reality of his filings and the court's orders. The inconsistencies are caused by the now substantiated racketeering schemes that have been deployed on purpose to silence and enslave Father.

148. Specifically, Father's prior federal Civil RICO class action complaint properly identified that, to falsify the dockets, the Family Court has been relying on the ambiguity/inconsistency of the inadequate "handshake protocol" inherently present in physically mailed submissions.

149. Therefore, Father could never prove that Family Court explicitly discarded (or effectively erased) his mailed pleadings and evidence as mere "garbage." However, perhaps driven by the SJC's confirmation on 5/31/2024 -- that Father's timely and properly submitted notices of direct appeal were, once again, never docketed in Family Court --, he was suddenly allowed to finally e-file all his parallel submissions with the Family Court starting in June of 2024.

150. As the e-filing system provides the necessary and adequate “immediate acknowledgment”- based handshake protocol, Father has all the emailed proofs that Family Court deliberately a) discarded his proper and timely submissions and b) effectively erased his required evidence.

151. Consequently, Father will continue to renew his complaints for deliberate discrimination, subsequent targeted retaliations, and civil rights (**including absolute employment denials**) violations against the Family Court and State with the AGO and relevant federal agencies..

Signed under the pains and penalties of perjury.

September 8, 2025

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>

ADDENDUM TABLE OF CONTENTS

1/26/2024 U.S. Court of Appeals, First Circuit, No. 24-1075 -- Docketing Statement	37
5/23/2025 U.S. Supreme Court, No. 24-7282 -- Notices	40
6/25/2025 U.S. District Court, No. 1:25-cv-11831-AK -- Docketing and affidavit .	42
Complaint For Declaratory And Injunctive Relief And Damages	46
8/1/2025 Mass. Supreme Judicial Court, No. DAR-30493 -- Notice of Entry	76
8/6/2025 U.S. District Court, No. 1:25-cv-11831-AK -- Motion to amend/affidavits	77
8/10/2025 AGO & FBI Boston -- Renewed complaint and attached evidence	86
6/30/2025 Complaint submitted to the DOJ	95
11/10/2024 Open letter/affidavit mailed to The White House	99
8/6/2025 Complaint submitted to the U.S. Dept. of HHS	120
8/22/2025 Mass. Appeals Court, Nos. 2025-J-0595/0596 -- Petitions for relief	125
8/27/2025 Mass. Appeals Court, No. [REDACTED] -- Docketing statement and brief	150
12/5/2013 Family Court -- Secret “gatekeeper” order	207
11/23/2013 Never docketed and concealed “Offer of Proof”	208
(9-Volume) Combined Record Appendix TOC	213
Key excerpts from the “SJC Record”	232, 234, 236, 238
9/4/2025 Mass. Appeals Court, No. [REDACTED] -- Docket entries	244
9/5/2025 Mass. Supreme Judicial Court, No. SJ-2025-M006 -- Docket entries	247
9/8/2025 U.S. District Court, No. 1:25-cv-11831-AK -- Proof of filed status affidavit	251
9/15/2025 U.S. Supreme Court -- TBD Petition for a writ of certiorari	252
Key excerpts from the “SJC Record”	256, 258, 273, 283, 291, 293, 294