

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION

IMRE KIFOR, individually and on behalf  
of all others similarly situated,  
Plaintiff,

v.

THE COMMONWEALTH OF MASSACHUSETTS,  
GOVERNOR MAURA HEALY (official capacity), ATTORNEY  
GENERAL ANDREA CAMPBELL (official capacity),  
COMMISSIONER GEOFFREY SNYDER (official capacity,  
Department of Revenue, Child Support Enforcement Division),  
MIDDLESEX PROBATE AND FAMILY COURT, THE  
COUNSELING CENTER OF NEW ENGLAND, ATRIUS  
HEALTH, [REDACTED], and [REDACTED],  
[REDACTED],  
Defendants.

**Case No:**

IMRE KIFOR'S AFFIDAVIT ON DELIBERATELY INDUCED EXISTENTIAL  
EMPLOYMENT, HEALTH, AND HOUSING CRISIS

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

- 1) Father has four children from non-overlapping, long-term, and fully committed relationships: two children ("Twins") with former wife [REDACTED] ("Mother-B") and another two younger children, ("Siblings") with former fiancée [REDACTED], ("Mother-C").
- 2) The colluding Mothers initiated custody/child-support-related lawsuits against Father under false pretenses in the Middlesex Probate and Family Court ("Family Court") in May 2011.
- 3) Family Court allowed two "activist" Guardian ad Litem ("GALs") from Harvard to fabricate infantile narratives like: "[daughter] is afraid the father will 'put suction cups on her feet and take her out the window,' and [son] is afraid the father would 'put him in boiling water' if he

went back in the father's care." Using the GALs' evasive depositions, Father compiled a 110-page affidavit meticulously documenting 900+ malicious errors in the GALs' filed report.

- 4) On the first trial day, on 8/3/2012, the "feminist" GAL testified under oath: "Q. Now, on page 23 of your first GAL report, you stated that [Father's] father moved to the U.S. in 1982 and that his mother joined him when she retired in 2004, is that correct? **A. That was an error.**"
- 5) The ever elusive "feminist equity" (a fundamentally Marxist concept) can only be protected with dogmatic and stereotypical "toxic masculinity" crudely generalizing projections, just as the GALs did (plausibly over 400 times in our Family Courts) when basing their "possible personality disorder" fabrication on Father's massively invalidated but easily verifiable past.
- 6) Father was still not permitted to present his defense of the splintered "one person, divergent sets of facts" reality of the three court dockets and parallel judgments issued on 2/13/2014 and 6/30/2014. Family Court went to extremes to prohibit him from filing his evidence and calling his witnesses, contradicting the superficial claims that Father "had his day in court."
- 7) Specifically, Family Court revealed in the 6/30/2014 judgment that: "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-B] in light of [Father's] prior vigorous assertion of privilege and [Mother-B's] inability to conduct discovery regarding such witness(es)." Family Court reiterated the **equity-based restrictions** by ordering "Father must obtain permission from the Court prior to filing and serving any pleadings on [Mother-B] or [her] counsel" in the also fraud-based 6/13/2019 judgment.

8) The cited 12/5/2013 denial was never communicated to Father and, as the routinely falsified and secretive new Family Court docket entries prove, it was not entered on the docket until 7/15/2014, rendering the evidentiary restrictions unappealable. The fraud, defamation, and deliberate discrimination by the Defendants have also tormented Father's children since then and also predictably led to the four dear children's now absolute and total parental alienation.

**Deliberately Induced Forced Indigency**

- 9) Through all recent hearings, Family Court has systemically rejected Father's evidence, even regarding his supervised visitations (the 14 monitors never complained about his **500+** visits with his four children) by flatly denying the sole trial exhibit about Father having to end the visits to protect his crying children. The ongoing activities allowed by the Defendants have also resulted in Father's depleted finances and his forced indigency that started on 2/12/2018 when Family Court initiated a punitive crusade against him in response to his efforts to seek relief. As he had been alleging child-predatory "mental health" fraud, driven by encouraged discriminatory activism, Father was labeled "dangerous," silenced, and sentenced to jail.
- 10) Specifically, Father's efforts to seek relief in the various state courts can be summarized by his consistently renewed six motions requesting to 1) investigate & stop sustained, systemic, and institutionalized child abuse (parental alienation), 2) investigate & stop predatory and fraudulent "mental health" madness, 3) investigate & stop sustained and systemic fraud on the court, 4) investigate "fit to parent" questions and "dangerous to children" allegations, 5) grant relief from "biased, faulty and incomplete" judgments, and 6) permission to publish.
- 11) Father has provided the Defendants with his complete and verifiable financial disclosures and submitted compliant job applications (**800+** in 2019 and another **950+** since 12/6/2021) to

substantiate his forced indigency claims. This equally entails a lack of assets and the deliberately denied ability to earn a living. Both of these were repeatedly invalidated by Family Court when continually ignoring or silently denying Father's affidavits of indigency.

12) Rejecting the consequences of discriminatory activism only to conceal the now substantiated profiteering racket, Family Court refused to investigate the direct causes of forced indigency.

13) After systemically denying Father's free speech, equal protection, and due process rights, Family Court continued to issue "guilty" judgments and findings for "willful" nonpayment of child support. Family Court has leveraged the parallel cases to force Father into **involuntary servitude** (by ordering Father to seek jobs that could not support him in the future) and to sentence him with no intentions to address the causes of his indigency. Specifically, Family Court suspended Father's driver's license while ordering him to get "minimum wage" jobs.

14) As none of Father's years-long efforts, including his ongoing full-time professional software engineering work, have been able to solve his induced forced indigency, Father has diligently attempted to properly and timely appeal the wrongful stream of interdependent court rulings.

15) In the now substantiated conspiracy to silence and enslave Father, Family Court systemically sabotaged Father's repeated appeals (without any manifested/proper appellate jurisdiction).

16) Father has moved Family Court to finalize the contempt actions by issuing judgments. With no rulings issued, Father appealed on an interlocutory level, citing the falsity of the claims.

17) Despite explicit requests to the Massachusetts Appeals and Supreme Judicial Courts ("SJC"), no decisions about Father's forced indigency have been reviewed. Therefore, the resulting controversy and judicial deadlock are significant as Father's forced indigency is **intractable**.

- 18) The act of any employer hiring Father (without preemptively covering his now \$355,000+ of in-arrears obligations for all his four children) would immediately deny Father's ability to perform his duties as his income needed for survival would effectively be all garnished.
- 19) Father has voluntarily disclosed his complete record of all financials as needed protection from the continued false allegations by the two Mothers. While the millionaire Mother-B had known about Father's license suspension, she conspired with Family Court to order Father to jail on 10/21/2019 over a mere \$255 by extending her ongoing financial fabrications in her thus targeted effort to regain her sought-after "primary child supports" versus Mother-C.
- 20) Recently, Mother-B also paid \$400 to the Middlesex Sheriff to arrest the forcedly indigent Father again and drag him to court, only for the Family Court to immediately release him.
- 21) Since filing his first complaints for modifications, Father has complied with his professional obligations as an able, capable, eager, trained, and skilled software engineer by continuing to work without compensation. Father's children have still lost all connections with and support from their loving father and their entire deliberately and ruthlessly "ejected" paternal family.
- 22) Family Court continues to sabotage Father's complaints for modifications (the 6th wave of such parallel attempts was just **refiled** on 3/13/2023) only to force him to stay "in contempt."
- 23) Specifically, the DOR CSE notified Father once again that having health insurance "is the law." Moreover, Father has to provide health insurance for his four children according to the, therefore, unmodifiable orders. The Mass. HealthConnector is ready to provide \$0 cost health insurance to the forcedly indigent Father and his four children, as long as they are not listed on any other policies. The Mothers' refusal to cancel the children's current insurance policies predictably creates a trap for Father to be held in contempt of either "the law" or the orders.

- 24) December 2017 was the last time the now forcedly indigent Father could pay his court-ordered ~\$5K monthly obligations for his four children. Father's in-arrears responsibilities have now reached \$355,000+. Pursuant to [CSE: Program Basics](#)<sup>1</sup>, Father has been diligently attempting to rightfully modify the Family Court's parallel judgments since January 2018.
- 25) On 2/15/2019, Father pleaded in Family Court: “[during the 1/11/2019 hearing, the Court] attempted to ‘spin’ Father’s desperate call for the Court’s action and tried to bully Father into saying under oath that he just wanted to ‘not pay any support.’ Father emphatically repeated three times to the judge, ‘**I want to TRIPLE child support. I want to pay as much as my children deserve.**’ The Court then promised written rulings, and Father is still waiting ...”
- 26) During the 3/23/2023 hearing, Family Court once again insisted that Father’s objective with the lawsuits had been to “reduce his child support amounts,” demanding that Father agree to that **substantiated falsity** under oath. Father respectfully rejected the narrative and restated that he had wanted, in fact, “to triple” his support for his four children. Father is an educated, trained, skilled, and hard-working professional, and without the sustained and systemic fraud deliberately unleashed upon him, Father would have no issues supporting his four children.

**“Father Is [A Barbaric] Romanian”**

- 27) The renewed bullying episode by Family Court was identical to Father’s prior experience in Romania with the [Securitate](#)<sup>2</sup> (the Secret Police). The Securitate’s practice was to fabricate a “crime” and then threaten its targets until they agreed to become informants. No defenses,

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<sup>1</sup> <https://crsreports.congress.gov/product/pdf/RS/RS22380>

<sup>2</sup> <https://en.wikipedia.org/wiki/Securitate>

arguments, or discussions were allowed, similar to Family Court's secretive "gatekeeper orders." Father never gave in to the Securitate despite being beaten and forcefully isolated.

- 28) Contrary to the manifested trivializations in Family Court, the Secret Police in communist tyrannies did not formally arrest their targets. They came at night and operated just like the Family Court does by setting traps, resorting to informal house arrests, and using endless psychological torture. And by leveraging their targets' innocent loved ones. This shared activist feminist agenda was captured during the trials in Family Court: "But don't you agree that he needs to accept his role in what happened to the children to understand how to change his behavior? [Activist feminist Harvard] GAL: Yes, I do," see the attached trial transcripts.
- 29) Father was the ideal candidate for such activist "reprogramming." He came from Romania, and as per [Hillary Clinton](#)<sup>3</sup>: "The Government Has No Business' in abortion decisions. **We are not Romania.**" Reframing the ancient Romanian political struggles, she deceived: "I've been to countries where governments forced women to bear children like ... in Romania."
- 30) The activist Harvard GALs deliberately fabricated the false narratives by first invalidating Father's own "good" mother and then setting the goals of their child-predatory "experiment" by dogmatically mandating "supervised visits only, indefinitely, due to the history of punitive behaviors and data that suggest [Father] will not be amenable to mental health treatment."
- 31) As mere child-predatory psychologists, i.e., without "first, do no harm" Hippocratic Oaths, the GALs were purpose-trained to invalidate and provoke their hapless, "naively loving" subjects to such a massive degree that even the hallmarks of manic psychosis, e.g., the

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<sup>3</sup> [https://www.huffpost.com/entry/hillary-clinton-abortion-debate\\_n\\_5808457de4b0180a36e92518](https://www.huffpost.com/entry/hillary-clinton-abortion-debate_n_5808457de4b0180a36e92518)

“unusually-strong expenditures of energy” would certainly appear. Could a sadistic zoo keeper use **federal assistance** to endlessly poke and torture their frantic, bleeding, caged animals until their openly public collapse? Having grown used to the ruthless communist “weaponized psychology,” Father never turned violent, avoided succumbing to depression, did not become ill, and never gave up hope despite his induced paralyzing forced indigency.

32) The Commonwealth continues diverting significant federal assistance to finance such activist “experiments.” In Father’s case, it is targeted discrimination (based on his national origin) that also applies purpose-fabricated “mental health” fraud only to gauge how to “reprogram toxic men” (who cannot get pregnant but still want connection with their stolen children).

**Witness Tampering: “I Believe That He Raped You”**

33) The activist feminist narratives, e.g., “Romanians forced women to bear children” and “We are not Romania,” necessitated a sudden “witness tampering” by Mother-B. Specifically the “I believe that he raped you. And yeah - I’m still afraid of him. It was 12 years of lies and manipulation,” and “he did say that two kids with you was more cost-effective. He was really scared about rape” collusion between the warring Mothers. In addition to Family Court later confirming that there was no rape and denying all of the thus extorted “\$163,399.76 of legal fees,” the fact remains that Father had also continued to offer his assistance with abortions, and it was the Mothers who continued to reject even the idea of “not having the children.”

34) Expressly contradicting her viciously **baiting emails** sent on 4/27/2011 to Mother-C, Mother-B voluntarily testified in the Concord District Court on 11/20/2009: “Yes, your Honor. First of all, I’d like to say that I have known [Father] for about 15 years, and during those 15 years



well yes we are divorced, he never once raised his hand or I never felt threatened. There were never arguments, we are divorced but never did I feel physically threatened by him.”

35) Directly refuting the maliciously projected activist “mental health” agenda, Father spared no effort to seek comprehensive psychiatric evaluations from 3 Harvard clinical psychiatrists.

36) The professional tests from superiors of the activist GALs confirmed that Father **“presented no danger to his children, and there was no indication of impairment of his fitness to parent.”** To refute the viciously invalidating projection by the “feminist” GAL onto Father’s “good” mother, the psychiatric tests included proper evaluations of Father’s parents as well, who had never abandoned their children and who had retired in 2004 after working in the U.S. together for the prior 18 years as highly effective Harvard Medical School scientists.

**Allowed Intimidation: “I Am Completely Horrified By These People”**

37) Father's four attorneys from the most prestigious Burns & Levinson, LLC, estimated that a trial against Dr. Deutsch, the “superstar” Harvard GAL, would cost him ~\$1,000,000 in legal fees. Moreover, the activist “feminist” GAL mandated six therapists to the case from her vast “feeder network” of psychologists who “took no insurance.” This added extortion cost Father another \$2,000/week combined only to stay in compliance with the Family Court’s orders.

38) The Burns & Levinson, LLC, attorneys emphasized that any equity-based justice is heavily prejudiced, “The satisfaction you are seeking is likely not to come out of trial with a Judge who thinks so very highly of Dr. Deutsch, no matter how hard we try to point out flaws.”

39) In the same email, they also threatened specifically with “The [maliciously altered and years-old] recording will weigh heavily on the Judge,” despite holding the evidence substantiating Father’s statement to the GAL, “Dear Dr. Deutsch, Aug 15, 2011, There was a court hearing

on August 8. [Mother-B's] attorney told the Court that you were provided with a copy of the DCF report, as well as a recording. I have just had the opportunity to read the DCF report. Since we did not talk about either of these items, I wanted to provide you with my perspective. I am happy to meet if you feel it is appropriate, to talk about these and any other items... The recording was made a year and a half ago (February 2010). [Mother-B] has had it in her possession since the day after it was made and has used it to try to make demands of me. I did yell at [my son], but I did not hit [my son]. I would appreciate the opportunity to speak with you further to explain the circumstances of the recording at your convenience."

- 40) The biased GAL never considered any of Father's submitted evidence and instead allowed her "investigation" to be dictated entirely by a stereotypically discriminatory activist agenda.
- 41) The clear textual contradictions provided Father with the evidentiary basis for his above-cited 110-page affidavit meticulously documenting the 900+ malicious errors in the GALs' report.
- 42) Father desperately changed course once his Full Affidavit Questioning Dr. Deutsch's Report was complete and filed. Father's lone new attorney soon emailed him, "**I am completely horrified by these people.**" Predictably, the young attorney could not take the blackmailing pressure allowed in Family Court, and she quit the case while informing the Court that Father "feels counsel is not acting on his behalf but as a 'trojan horse'" just before the last trial day.
- 43) That same attorney had just confirmed to Family Court in Mother-C's parallel matters that "[Father] testified during trial that he had been making his decisions under 'extreme [legal] duress' and he wishes the Court to consider his duress in rendering a decision on this matter. He feels that his claim of [legal] duress was not elaborated on nor verified sufficiently during trial, and he would like to submit an affidavit to the Court addressing his concerns. [Father]

has prepared the Affidavit on his own and without the assistance of counsel. Should the Court be open to considering the Affidavit, [Father] would like to submit it directly to the Court.”

- 44) Father’s and Mother-C’s attorneys colluded in filing a frivolous complaint for contempt only to attempt to silence the loving and protective Father from complaining to the children’s caretakers about the systemic child abuse allowed to continue in the name of the activist agenda. Ultimately, Family Court ordered in the 2/13/2014 judgment, “[Father] is NOT GUILTY of Contempt as filed in [Mother-C]’s Complaint for Contempt on March 22, 2013.”
- 45) Father relinquished his attorney/client and therapist/patient privileges on 11/25/2013. The Family Court issued the “gatekeeper orders” on 12/5/2013 to avoid any appellate reviews.

**Forced Out-Of-State Medicating Of Children: “It Is A Catch-22”**

- 46) The children were first fully isolated from Father to forcefully silence him from complaining.
- 47) Then they were sent out of state to be illegally medicated and actively brainwashed against Father. They were tortured with unnecessary “cancer surgery” for court purposes (and paid with fraudulent insurance) and then “interrogated” in school (so they “cried”). And finally, to forcefully renounce their Father against their wishes, perjury was suborned on the children.
- 48) Father’s attorney summarized the practice allowed in Family Court in her email: “I must admit that I am frustrated by this development. Visitation centers will not force a visit when the kids refuse (it is a policy at all centers that I know of) and judges can't force them to go forward because the centers are independent. It is a catch-22. If the kids are refusing even supervised visits, it makes it unlikely that he would terminate supervision at this time. Also, switching to unsupervised visits right now seems to put you at great risk for false allegations. Contempt would be hard to prove because [Mother-B] will say that she is complying with the

order and the problem is the kids. Perhaps we need to try and get [Judge] Donnelly to order some family counseling for all four of you to try and get the visits back on track. However, my gut tells me that [Mother-B] is going to make sure that the kids refuse calls and visits until she gets what she wants - [your son] on ADHD medication [prescribed out of state].”

49) The documented child abuse and agenda-driven parental alienation became concealed when Family Court ignored Father’s response motion, affidavit, and extensive exhibits on 2/3/2014 while simultaneously stripping Father of his protective legal custody of his dear children.

50) This occurred just after the 12/5/2013 “gatekeeper orders” were issued by Family Court.

**Deliberately Induced Existential Employment, Health, And Housing Crisis**

51) Father asserted to the U.S. Supreme Court, No. 23-5932, that “SJC-13427 simultaneously violates Father’s ultimate equity and constitutional civil rights when deliberately reframing, with blatantly flawed deductive logic, Father’s unambiguously communicated personal experiences. Father claims that SJC-13427 acted [on 8/8/2023] to continue to conceal and obstruct the now substantiated conspiracy to silence and enslave the whistleblower Father.”

52) Father asserted that “[he] claims that SJC-13427 deliberately obstructed (therefore conspiring with) a ... Rule 60 Fraud On The Court when finding that: ‘In this case, Kifor failed to carry his burden of demonstrating that adequate alternative remedies were not available to him.’”

53) He documented that “Moreover, while massively invalidating Father’s personal experiences and conspiring to violate his constitutional civil rights, SJC-13427 also threatened Father to stay silent about his meticulously collected and compiled filed record: ‘This is the fifth time that Kifor has sought some form of extraordinary relief arising from protracted litigation

between him and the mothers of his children. He has been warned repeatedly that ‘further baseless attempts to obtain extraordinary relief could result in sanctions.’”

54) Questioning the constitutionality of President Biden’s 2/16/2023 order, “As the consequences of the above Presidential 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 directly implied ‘**American Gulag Of Leftovers**’ can be categorized only as a base for the new ‘forced deprogramming’<sup>4</sup> of the masses,” Father concluded that “[he was] a proper representative **forced ‘joint employee’** of such American Gulag ‘joint employer,’ as he tirelessly works every day under the direct threat of detention without any compensation (or protection by the State) whatsoever.”

Signed under the pains and penalties of perjury.

November 5, 2023,

Respectfully submitted,

/s/ Imre Kifor

Imre Kifor, Pro Se



Newton, MA 02464

[ikifor@gmail.com](mailto:ikifor@gmail.com)

I have no phone

I have no valid driver’s license

I have to move to a homeless shelter

<https://femfas.net/>

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<sup>4</sup> See <https://www.cnn.com/videos/politics/2023/10/06/hillary-clinton-maga-cult-extremists-donald-trump-house-republicans-amanpour-cnntm-vpx.cnn>

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