

COMMONWEALTH OF MASSACHUSETTS

SUPREME JUDICIAL COURT

SUFFOLK, ss

DOCKET No. SJC-13427

IMRE KIFOR,

Petitioner,

v.

THE COMMONWEALTH OF MASSACHUSETTS, GOVERNOR MAURA HEALY (official capacity), ATTORNEY GENERAL ANDREA CAMPBELL (official capacity), COMMISSIONER GEOFFREY SNYDER (official capacity, MA DOR CSE), MIDDLESEX PROBATE AND FAMILY COURT, [REDACTED], and

[REDACTED],
Respondents.

On Appeal From Single Justice Supreme Judicial Court

DOCKET No. SJ-2023-0122

Imre Kifor's SJC Rule 2:21 (Appeal) Memorandum

Date: 5/7/2023

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INTRODUCTION

1. Pursuant to Supreme Judicial Court Rule 2:21, the Petitioner, Imre Kifor ("Father"), is appealing the Single Justice denial of relief entered on 5/1/2023.
2. The denial is attached in the addendum (see A:44¹).
3. As per SJC Rule 2:21, "the record appendix shall be accompanied by a memorandum of not more than ten pages in which the appellant must set forth the reasons why review of the trial court decision cannot adequately be obtained on appeal from any final adverse judgment in the trial court or by other available means."
4. Due to the continued retaliatory actions by some of the Respondents ("State"), Father filed his "Emergency Petition For Relief In The Nature Of Certiorari Pursuant To G.L.c. 249, § 4" on 4/2/2023, R:296. The petition was based on substantiations of a systemic and sustained conspiracy to silence and enslave, R:07.
5. The purely retaliatory judicial acts have directly induced Father's now confirmed **forced indigency**, A:54.
6. Since 1/19/2018, Father has properly and timely filed repeated parallel complaints for modifications

¹Pages of the attached addendum or the also filed record appendix are referred to by "A:" or "R:", respectively.

with the Middlesex Probate And Family Court ("Family Court") as a testament to his continued commitment to prosecuting his child support cases that also led to his skyrocketing **\$325,000+** of in-arrears obligations.

7. The Family Court has still deliberately sabotaged Father's earnest and desperate efforts with endless delays, "silent treatments," and outright falsifying their dockets in violation of G.L.c. 261, §§ 27B-D.

8. Regarding the direct violations of the Indigent Court Costs Law, Father petitioned the SJC, pursuant to G.L.c. 211, § 3. Father's appeal, SJC-13392, was filed on 3/6/2023, A:51, and has not been decided yet.

9. In response to Father's vigorous and prompt appeals of the discriminatory judicial acts, the Family Court suddenly changed strategy and, on the next day, on 3/7/2023, notified Father of the mere existence of secretive new "gatekeeper orders," specifically that "you need permission to file on these cases," A:52.

10. The Family Court never communicated the actual orders with Father, rendering the orders unappealable.

11. Father's herein appealed petition, pursuant to G.L.c. 249, § 4, requested relief from these **secretive**

orders, as "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 [the federal] Title VI was intended to prevent and specifically eradicate," R:472 (or R:464).

12. As opposed to the still active SJC-13392 parallel appeal, the herein appeal is not about G.L.c. 211, § 3, or "general superintendence" of inferior courts but about G.L.c. 249, § 4, or the "review" of routine but also unappealable secretive "gatekeeper orders," A:53.

STATEMENT OF ISSUES

13. Addressed and preserved in the docket records, this appeal respectfully raises the following issues:

- A) Question of fact (reviewable for "clear error"): did the Single Justice Court err on 5/1/2023 when ignoring the "entirety" of the record for the denial?
- B) Question of law (reviewable *de novo*): did the Single Justice Court err when disregarding the Family

Court's violations of Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., ("Title VI")?

C) Question of discretion (reviewable for abuse): did the Single Justice err when neglecting due process, equal protection, and other constitutional rights?

STATEMENT OF THE CASE

4. Starting in 2011, the Family Court deliberately allowed the bitterly jealous and vindictive mothers to collude and simultaneously target Father with false claims based on the mothers' child-predatory fraud, defamations, and stereotypical discriminations, R:299.

5. Notoriously cruel "activist" Harvard GALs were allowed to custom fabricate false narratives like: "specifically, [child] is afraid the father will 'put suction cups on her feet and take her out the window,' and [child] is afraid the father would 'put him in boiling water' if he went back in the father's care."

6. Using the GALs' evasive depositions, Father later compiled a 110 pages affidavit documenting 900+ errors in the GALs' report. However, Father was not permitted to present his unified defense of the deliberately splintered "one person, yet divergent sets of facts"

reality of the three Family Court dockets. Parallel adverse judgments were issued on 2/13 and 6/30/2014.

7. The substantiated fraud, deliberate defamation, and stereotypical discriminations by the Family Court have also tormented Father's children and led to the four children's now **absolute and total parental alienation**.

8. The ongoing activities openly allowed in the Family Court resulted in Father's fully depleted finances and his induced forced indigency that started on 2/12/2018 when the Family Court initiated the punitive crusade against him in response to his efforts to seek relief.

9. In the now substantiated conspiracy to silence and enslave Father, the Family Court has systemically, and without proper appellate jurisdiction, sabotaged his efforts to appeal the sequence of fraud-based rulings.

10. This conspiracy intrinsically relies on knowingly violating Father's civil rights. Therefore, Father asserted in federal courts that Massachusetts seeks to maximize federal reimbursements and, while "competing against all other states, this can be accomplished only by: (1) targeting families with more resources, (2) individually maximizing each support amount by

forcefully separating children from their nonresident parents, (3) allowing fabrications of 'high-conflicts' into the cases only to incentivize the vast 'feeder network' of colluding professionals, (4) hiding the thus induced legal struggle by 'cooking' the court's docket records, and (5) concealing any wrongdoing with protecting schemes from all appellate discovery and federal penalty inducing corrections," see also R:63.

11. Father's cited reason for the U.S. Supreme Court granting his petition was plain: "by substantiating these child-predatory 'activist' schemes, Father alleges that the many federal taxpayers are being used to benefit the few state taxpayers," A:80 or #22-7115.

STATEMENT OF FACTS

12. Father specifically asserted that the conspiracy to silence and enslave him, by ruthlessly leveraging his children, was behind the punitive and retaliatory actions by the State as he had repeatedly requested due investigations into the matters from the State.

13. Father contended that the "association in fact" between the Family Court and the various other parties was a legitimate RICO Enterprise, R:59. The definition

of the Enterprise as it aims to maximize federal reimbursements (along with their reinvestments in a positive feedback loop), satisfies the RICO interstate or "federal" commerce requirement. The Family Court is the *de facto* "hub" of this Enterprise, with all the other parties being the service provider "spokes."

14. The scheme behind the intent of these racketeering activities was to deceive a prepared Father in his affirmed efforts to appeal the Family Court's rulings and to conceal from and sabotage any appellate reviews of his duly filed evidence or the mere docket entries.

Systemic Judicial Neglect By The State

15. Father has substantiated that the docket entries of the Family Court continue to not reflect the simple reality of his proper filings and the court's orders.

16. In a series of petitions to this Court, Father has claimed that the judicial deadlock (purpose fabricated by the Family Court through the also allowed filing of endless and frivolous complaints for contempt) was an apparent "**war of attrition**" aimed at delaying any due investigations and denying Father's desperate requests for relief from his thus retaliatory forced indigency.

17. During the last hearing, the Family Court ordered Father to justify his filed request for the continued protection of his older twins, who recently turned 19.

18. Father has already substantiated in his filings that the allowed fraud, defamation, and discrimination have also affected the children. The Family Court abandoning them now cannot be justified without any reparations for the deliberately inflicted damages.

19. Specifically, Father's children were first fully isolated from him to forcefully silence Father from complaining. 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 that they "cried"). And finally, to forcefully renounce their dad, perjury was suborned on Father's children.

20. The meticulously documented systemic child abuse and agenda-driven parental alienation were effectively concealed when the Family Court ignored Father's duly submitted filings on 2/3/2014 while stripping him of his protective legal custody of his dear children.

Predictably, this occurred just after the 12/5/2013 "gatekeeper orders" were issued by the Family Court.

Sustained And Deliberate Title VI Violations

21. Father claims that "the State continues to openly divert significant federal assistance to finance this activist 'experiment,' a targeted discrimination based on national origin in Father's specific case, armed with purpose-fabricated 'mental health' fraud," R:472.

22. Therefore, Father moved the U.S. Court of Appeals, First Circuit, R:464, to grant him Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*, and 42 U.S.C. § 1983 injunctions against the State based on facts repeatedly substantiated in this Court.

"Men Can Get Pregnant" Political Agenda

23. In his parallel SJC-13392 appeal, Father claimed that "as the State now openly asserts that 'men can get pregnant,' and Father is undoubtedly not a man who could ever get pregnant, Father ceases to exist as a man worthy of any protection by the State." The switch to eject Father's twins from the Family Court proves that "reprogramming" men who cannot get pregnant yet still want a connection with their children had been

the State's objective all along, despite Father's arrests and his damaging jail sentence in blatant and deliberate violations of his constitutional rights.

ARGUMENT

24. 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.

25. Therefore, the Family Court's "gatekeeper orders," while unappealable, serve as secretive instruments to conceal the already substantiated **fraud on the court**.

26. In this context of deliberately falsified docket records, it is manifestly impossible to start a case labeled "dangerous" in the activist Family Court or to adequately appeal any final decision predetermined to be an adverse judgment by it being directly caused by Title VI discriminations or subsequent retaliations.

CONCLUSION

27. Specifically, this routine of "gatekeeper orders" is, therefore, a deliberate conspiracy to silence and enslave. And the targets of the profiteering State are the men who cannot get pregnant (but depend on those

who can for their innate human happiness, i.e., their children), which is plain discrimination based on sex.

Signed under the pains and penalties of perjury.

May 7, 2023

Respectfully submitted,

/s/ Imre Kifor
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