

**COMMONWEALTH OF MASSACHUSETTS  
APPEALS COURT**

Middlesex, ss

DOCKET No. 2021-P-[REDACTED]

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Imre Kifor, Appellant

v.

[REDACTED] & another, Appellees

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On Appeal From Middlesex Superior Court

DOCKET No. [REDACTED]

On Appeal From Single Justice Appeals Court

Consolidated DOCKET No. 2021-P-[REDACTED]

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**Imre Kifor's Appellant Brief**

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Date: 11/19/2021

Imre Kifor, Pro Se  
[REDACTED]

Acton, MA 01720

I have no phone

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

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<sup>1</sup> The 21-P-503, 21-P-901 and 21-P-902 appeals with identical shared contexts have been paired per the 10/12/2021 orders.

18. Father's core allegations of fraud in Family Court have all been connected to leveraging his 4 children. Did Family Court err on 4/24/2019, A:167, by infesting the record with more abusive fabrications on children?

19. Systemic fraud always leads to intractable and thus fragile inconsistencies. Did Family Court err on 9/26/2018, A:171, when deliberately reframing a prior judgment without considering filed opposite evidence?

20. The root cause of these intractable issues lies in the demonstrated materially significant discrepancy of the parallel 2/13/2014 and 6/30/2014 judgments, A:181 & 208. Did Family Court err when tolerating the prior judgments' "storybooks" to contain over 1,200+ textual inconsistencies, R5:502 and R8:430, and thus feeding schemes for subsequent "high-conflict" child-predatory chaos and judicial "cancer," as a fraud on all courts?

21. Did Family Court err when forcefully silencing and then relentlessly punishing a whistleblower who dared to complain about child-predatory GAL investigations?

22. Did Family Court err on 6/13/2021 when labelling Father's pleadings "unintelligible/incomprehensible" and silencing his evidence as not "cogent," R2:326?

IMPOUNDED TO PROTECT THE CHILDREN

**COMMONWEALTH OF MASSACHUSETTS**

**APPEALS COURT**

Middlesex, ss

DOCKET Nos. 2021-P- [REDACTED]  
2021-P- [REDACTED]  
2021-P- [REDACTED]

Imre Kifor, Appellant

v.

[REDACTED], Appellees

On Appeal From Middlesex Superior Court

DOCKET No. [REDACTED]

On Appeal From Single Justice Appeals Court

Consolidated DOCKET No. [REDACTED]

On Appeal From Middlesex Probate And Family Court

DOCKET Nos. [REDACTED]

**Imre Kifor's Combined<sup>1</sup> Record Appendix  
Original Family Affidavits & Letters VOL VIII of IX**

Date: 11/15/2021

Imre Kifor, Pro Se

[REDACTED]  
Acton, MA, 01720

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<sup>1</sup> The appeals are combined herein per the 10/12/2021 orders.

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## Qnarre Pivot Report

Count of Text Row Labels	Column Labels					Grand Total
	bias	confusion	disregard	fabrication	validation	
<b>attorney fees</b>	<b>6</b>	<b>1</b>	<b>43</b>	<b>16</b>	<b>31</b>	<b>97</b>
cause of child poverty		1	4	2	2	9
court sanctioned extortion	1		12	5	6	24
exaggerated protection				1	1	2
massive representation			5	1	1	7
professional child predator			3		1	4
promised riches and control	4		9	3	3	19
protracted legal churning			7	3	15	25
target stereotypical faults	1					1
trojan horse attorney			3	1	2	6
<b>child health fraud</b>	<b>2</b>	<b>4</b>	<b>39</b>	<b>46</b>	<b>37</b>	<b>129</b>
compel child to pretend			4	5	2	11
conceal medical reality	1	2	4	8	5	21
conceal PTSD in child			8	7	7	22
disturb children for gain			4	6	3	13
ignore child torturing		1	2	7	11	21
out-of-state out-of-reach			2			2
pediatrician self-protection			2		1	3
protracted insurance fraud	1		2	6		9
seize legal custody			3	2	2	7
waterboard children for proof		1	8	5	6	20
<b>exploited child support</b>	<b>2</b>	<b>3</b>	<b>7</b>	<b>12</b>	<b>18</b>	<b>42</b>
paid in advance	1		1	2	4	8
payments never missed					4	4
proactive payment protection	1		3	1	4	9
protracted financial fraud		3	1	8	6	18
victimized children			2	1		3
<b>intractable jealousy</b>	<b>4</b>	<b>5</b>	<b>56</b>	<b>34</b>	<b>39</b>	<b>139</b>
abandoning children			3			3
coaching children to destroy			9	6	5	20
existential financial threat			3	2	4	9
maneuvering for lawsuit	2		16	5	7	30
projecting guilt			1			1
sweeping endless envy	2	1	6	3	7	19
terrorizing with lawyers			9	10	7	27
women viciously bullying		4	9	8	9	30
<b>lucrative high conflict</b>	<b>4</b>	<b>5</b>	<b>49</b>	<b>37</b>	<b>42</b>	<b>143</b>
churn parents with children		2	11	7	6	27
conjecture a pattern			4	7	2	13
destabilize to provoke	1	1	4	2	4	13
expand feeder network			4	2		6
feeder network extortion			3	6	2	13
fragment to provoke			1	1	5	7
high yield targeting	2		6	1	6	15
invalidate to provoke		2	3	4	2	11
stereotypical targeting			7	2	5	15

## Qnarre Pivot Report

uproot to provoke (blank)	1		6	5	10	22
<b>mental health madness</b>	<b>5</b>	<b>4</b>	<b>12</b>	<b>23</b>	<b>7</b>	<b>51</b>
elites dominate			2	2	2	6
massively invalidate	2		4	9	1	16
possible personality disorder	3	4	1	4		12
post-communist informants			1			1
refined totalitarian tool			1	5	1	7
shield and sword privilege			2	1	2	5
splinter target to fit			1	2	1	4
<b>paternal alienation</b>	<b>1</b>	<b>8</b>	<b>45</b>	<b>37</b>	<b>21</b>	<b>114</b>
eternal supervision			3	12	6	21
forceful dissociation		2	3	6	5	17
forever conflict			4	3	1	8
paternal family exclusion		1	2	1	1	5
restrict paternal contact			7	11	4	22
sabotage paternal contact	1	5	26	4	4	41
<b>permission to publish</b>			<b>2</b>	<b>1</b>	<b>3</b>	<b>6</b>
harm principle respected					1	1
offense principle respected					1	1
pure freedom of expression			2	1	1	4
<b>predatory feminism</b>	<b>8</b>	<b>4</b>	<b>68</b>	<b>112</b>	<b>31</b>	<b>230</b>
deceive for advantage			3	2	5	10
deceive to destroy		2	8	15	4	29
deceive to originate	3		16	5	5	29
exclude to deceive			4	9		13
idolize to victimize			5	14	1	20
insinuate paternal guilt	2	1	11	10	4	28
mandate paternal guilt	1		4	25	2	33
mother bullied financially	1		4	5	1	13
mother bullied to abandon			2	2	6	11
mother manipulated				3		3
prove paternal unfitness	1		8	16	3	29
rigid toxic masculinity (blank)		1	3	6		10
<b>reductio ad absurdum</b>			<b>21</b>	<b>10</b>	<b>16</b>	<b>47</b>
complete transparency			6	3	10	19
false police arrest			1	4	1	6
hit son to avoid arrest			3	1	2	6
no custody claim					1	1
whistle blowing			11	2	2	15
<b>right to work</b>	<b>3</b>		<b>7</b>	<b>3</b>	<b>11</b>	<b>24</b>
corporate safeguarding			3		1	4
court sanctioned fear uncertainty doubt				1		1
forbidding malicious allegations	2		3	1	4	10
proactive steps			1		2	3
proven track record	1				3	4
significant investments				1	1	2
<b>ulterior motive</b>	<b>4</b>	<b>4</b>	<b>54</b>	<b>95</b>	<b>27</b>	<b>190</b>
activism through children			3	4	4	13

### Qnarre Pivot Report

activist empowerment		2	2	2	1	7
conceal ongoing fraud	2		15	35	10	65
delay for advantage			2	1	1	4
distort to confuse	1	1	14	20	5	41
divide and conquer			1	2		3
double down on fraud	1	1	11	21	4	39
erase initial fraud			6	10	2	18
<b>(blank)</b>						<b>65</b>
(blank)						65
<b>Grand Total</b>	<b>39</b>	<b>38</b>	<b>403</b>	<b>426</b>	<b>283</b>	<b>1277</b>



**Qnarre Short Report**

Row Labels	Count of Text
<b>attorney fees</b>	<b>97</b>
<b>cause of child poverty</b>	<b>9</b>
confusion	1
disregard	4
fabrication	2
validation	2
<b>court sanctioned extortion</b>	<b>24</b>
bias	1
disregard	12
fabrication	5
validation	6
<b>exaggerated protection</b>	<b>2</b>
fabrication	1
validation	1
<b>massive representation</b>	<b>7</b>
disregard	5
fabrication	1
validation	1
<b>professional child predator</b>	<b>4</b>
disregard	3
validation	1
<b>promised riches and control</b>	<b>19</b>
bias	4
disregard	9
fabrication	3
validation	3
<b>protracted legal churning</b>	<b>25</b>
disregard	7
fabrication	3
validation	15
<b>target stereotypical faults</b>	<b>1</b>
bias	1
<b>trojan horse attorney</b>	<b>6</b>
disregard	3
fabrication	1
validation	2
<b>child health fraud</b>	<b>129</b>
<b>compel child to pretend</b>	<b>11</b>
disregard	4
fabrication	5
validation	2
<b>conceal medical reality</b>	<b>21</b>

bias	1
confusion	2
disregard	4
fabrication	8
recast	1
validation	5
<b>conceal PTSD in child</b>	<b>22</b>
disregard	8
fabrication	7
validation	7
<b>disturb children for gain</b>	<b>13</b>
disregard	4
fabrication	6
validation	3
<b>ignore child torturing</b>	<b>21</b>
confusion	1
disregard	2
fabrication	7
validation	11
<b>out-of-state out-of-reach</b>	<b>2</b>
disregard	2
<b>pediatrician self-protection</b>	<b>3</b>
disregard	2
validation	1
<b>protracted insurance fraud</b>	<b>9</b>
bias	1
disregard	2
fabrication	6
<b>seize legal custody</b>	<b>7</b>
disregard	3
fabrication	2
validation	2
<b>waterboard children for proof</b>	<b>20</b>
confusion	1
disregard	8
fabrication	5
validation	6
<b>exploited child support</b>	<b>42</b>
<b>paid in advance</b>	<b>8</b>
bias	1
disregard	1
fabrication	2
validation	4
<b>payments never missed</b>	<b>4</b>
validation	4

## Qnarre Short Report

<b>proactive payment protection</b>	<b>9</b>		
bias	1		
disregard	3		
fabrication	1		
validation	4		
<b>protracted financial fraud</b>	<b>18</b>		
confusion	3		
disregard	1		
fabrication	8		
validation	6		
<b>victimized children</b>	<b>3</b>		
disregard	2		
fabrication	1		
<b>intractable jealousy</b>	<b>139</b>		
<b>abandoning children</b>	<b>3</b>		
disregard	3		
<b>coaching children to destroy</b>	<b>20</b>		
disregard	9		
fabrication	6		
validation	5		
<b>existential financial threat</b>	<b>9</b>		
disregard	3		
fabrication	2		
validation	4		
<b>maneuvering for lawsuit</b>	<b>30</b>		
bias	2		
disregard	16		
fabrication	5		
validation	7		
<b>projecting guilt</b>	<b>1</b>		
disregard	1		
<b>sweeping endless envy</b>	<b>19</b>		
bias	2		
confusion	1		
disregard	6		
fabrication	3		
validation	7		
<b>terrorizing with lawyers</b>	<b>27</b>		
disregard	9		
exclude	1		
fabrication	10		
validation	7		
<b>women viciously bullying</b>	<b>30</b>		
confusion	4		
disregard	9		
		fabrication	8
		validation	9
		<b>lucrative high conflict</b>	<b>143</b>
		<b>churn parents with children</b>	<b>27</b>
		confusion	2
		disregard	11
		fabrication	7
		polarize	1
		validation	6
		<b>conjecture a pattern</b>	<b>13</b>
		disregard	4
		fabrication	7
		validation	2
		<b>destabilize to provoke</b>	<b>13</b>
		bias	1
		confusion	1
		disregard	4
		elevate	1
		fabrication	2
		validation	4
		<b>expand feeder network</b>	<b>6</b>
		disregard	4
		fabrication	2
		<b>feeder network extortion</b>	<b>13</b>
		disregard	3
		fabrication	6
		perpetuate	2
		validation	2
		<b>fragment to provoke</b>	<b>7</b>
		disregard	1
		fabrication	1
		validation	5
		<b>high yield targeting</b>	<b>15</b>
		bias	2
		disregard	6
		fabrication	1
		validation	6
		<b>invalidate to provoke</b>	<b>11</b>
		confusion	2
		disregard	3
		fabrication	4
		validation	2
		<b>stereotypical targeting</b>	<b>15</b>
		disregard	7
		fabrication	2

## Qnarre Short Report

insinuate	1	disregard	3
validation	5	fabrication	6
<b>uproot to provoke</b>	<b>22</b>	polarize	1
bias	1	validation	5
disregard	6	<b>forever conflict</b>	<b>8</b>
fabrication	5	disregard	4
validation	10	fabrication	3
<b>(blank)</b>	<b>1</b>	validation	1
proof	1	<b>paternal family exclusion</b>	<b>5</b>
<b>mental health madness</b>	<b>51</b>	confusion	1
<b>elites dominate</b>	<b>6</b>	disregard	2
disregard	2	fabrication	1
fabrication	2	validation	1
validation	2	<b>restrict paternal contact</b>	<b>22</b>
<b>massively invalidate</b>	<b>16</b>	disregard	7
bias	2	fabrication	11
disregard	4	validation	4
fabrication	9	<b>sabotage paternal contact</b>	<b>41</b>
validation	1	bias	1
<b>possible personality disorder</b>	<b>12</b>	confusion	5
bias	3	disregard	26
confusion	4	fabrication	4
disregard	1	validation	4
fabrication	4	victimize	1
<b>post-communist informants</b>	<b>1</b>	<b>permission to publish</b>	<b>6</b>
disregard	1	<b>harm principle respected</b>	<b>1</b>
<b>refined totalitarian tool</b>	<b>7</b>	validation	1
disregard	1	<b>offense principle respected</b>	<b>1</b>
fabrication	5	validation	1
validation	1	<b>pure freedom of expression</b>	<b>4</b>
<b>shield and sword privilege</b>	<b>5</b>	disregard	2
disregard	2	fabrication	1
fabrication	1	validation	1
validation	2	<b>predatory feminism</b>	<b>230</b>
<b>splinter target to fit</b>	<b>4</b>	<b>deceive for advantage</b>	<b>10</b>
disregard	1	disregard	3
fabrication	2	fabrication	2
validation	1	validation	5
<b>paternal alienation</b>	<b>114</b>	<b>deceive to destroy</b>	<b>29</b>
<b>eternal supervision</b>	<b>21</b>	confusion	2
disregard	3	disregard	8
fabrication	12	fabrication	15
validation	6	validation	4
<b>forceful dissociation</b>	<b>17</b>	<b>deceive to originate</b>	<b>29</b>
confusion	2	bias	3

## Qnarre Short Report

disregard	16	(blank)	2
fabrication	5	proof	2
validation	5	<b>reductio ad absurdum</b>	<b>47</b>
<b>exclude to deceive</b>	<b>13</b>	<b>complete transparency</b>	<b>19</b>
disregard	4	disregard	6
fabrication	9	fabrication	3
<b>idolize to victimize</b>	<b>20</b>	validation	10
disregard	5	<b>false police arrest</b>	<b>6</b>
fabrication	14	disregard	1
validation	1	fabrication	4
<b>insinuate paternal guilt</b>	<b>28</b>	validation	1
bias	2	<b>hit son to avoid arrest</b>	<b>6</b>
confusion	1	disregard	3
disregard	11	fabrication	1
fabrication	10	validation	2
validation	4	<b>no custody claim</b>	<b>1</b>
<b>mandate paternal guilt</b>	<b>33</b>	validation	1
bias	1	<b>whistle blowing</b>	<b>15</b>
disregard	4	disregard	11
fabrication	25	fabrication	2
polarize	1	validation	2
validation	2	<b>right to work</b>	<b>24</b>
<b>mother bullied financially</b>	<b>13</b>	<b>corporate safeguarding</b>	<b>4</b>
bias	1	disregard	3
disregard	4	validation	1
fabrication	5	<b>court sanctioned fear uncertainty doubt</b>	<b>1</b>
insinuate	2	fabrication	1
validation	1	<b>forbidding malicious allegations</b>	<b>10</b>
<b>mother bullied to abandon</b>	<b>11</b>	bias	2
disregard	2	disregard	3
fabrication	2	fabrication	1
insinuate	1	validation	4
validation	6	<b>proactive steps</b>	<b>3</b>
<b>mother manipulated</b>	<b>3</b>	disregard	1
fabrication	3	validation	2
<b>prove paternal unfitness</b>	<b>29</b>	<b>proven track record</b>	<b>4</b>
bias	1	bias	1
disregard	8	validation	3
fabrication	16	<b>significant investments</b>	<b>2</b>
polarize	1	fabrication	1
validation	3	validation	1
<b>rigid toxic masculinity</b>	<b>10</b>	<b>ulterior motive</b>	<b>190</b>
confusion	1	<b>activism through children</b>	<b>13</b>
disregard	3	disregard	3
fabrication	6	fabrication	4

## Qnarre Short Report

perpetuate	1
polarize	1
validation	4
<b>activist empowerment</b>	<b>7</b>
confusion	2
disregard	2
fabrication	2
validation	1
<b>conceal ongoing fraud</b>	<b>65</b>
bias	2
disregard	15
fabrication	35
recast	3
validation	10
<b>delay for advantage</b>	<b>4</b>
disregard	2
fabrication	1
validation	1
<b>distort to confuse</b>	<b>41</b>
bias	1
confusion	1
disregard	14
fabrication	20
validation	5
<b>divide and conquer</b>	<b>3</b>
disregard	1
fabrication	2
<b>double down on fraud</b>	<b>39</b>
bias	1
confusion	1
disregard	11
fabrication	21
recast	1
validation	4
<b>erase initial fraud</b>	<b>18</b>
disregard	6
fabrication	10
validation	2
<b>(blank)</b>	<b>65</b>
<b>(blank)</b>	<b>65</b>
claim	65
<b>Grand Total</b>	<b>1277</b>

# Qnarre Full Report

Row Labels	Count of Text		
<b>attorney fees</b>	<b>97</b>		
<b>cause of child poverty</b>	<b>9</b>		
confusion	1		
with exception of attorney fees, Mom-C does not report any debts, liabilities	1		
disregard	4		
FS 12-08-06 Mom-C's reported no debts, liabilities, assets -\$14,817	1		
FS 13-08-19 Mom-C's reported assets \$11,593	1		
Mom-C had to apply for public assistance programs	1		
Mom-C testified, she needed assistance from government, food benefits, reduced heating, electricity	1		
fabrication	2		
to secure future support of Kids-C, Dad obtain life insurance policy of \$300,000 for Kids-C	1		
without deviation, Mom-C unable to financially support Kids-C on her own	1		
validation	2		
[Mom-C filed] Dad provide health insurance for Mom-C, Kids-C	1		
Mom-C, Dad equally share any costs associated with child care for Kids-C	1		
<b>court sanctioned extortion</b>	<b>24</b>		
bias	1		
Dad reported weekly income from salary from Quantapix \$1,346, expenses \$2,485	1		
disregard	12		
[12-08-06] Mom-C reported, she paid \$102,155 in attorney fees	1		
[altered recording] [Mom-C] wants \$10,000 [per month] from me	1		
[reappointment of GAL] 12-12-18 Mom-C filed opposition	1		
11-08-11 Court-C allowed joint motion for continuance	1		
2 GAL investigations, reports filed with Court-B	1		
at start, Mom-C reported assets \$167,908 with zero debts, liabilities	1		
currently, neither party is paying child support	1		
FS 11-06-03 Dad reported no debts, liabilities, assets \$3,016,000	1		
FS 11-11-17 Dad reported \$9,438 in debts, assets \$1,659,722	1		
FS 13-08-19 Mom-C reported attorney fees \$163,399 with unpaid \$61,244	1		
Mom-C testified, Dad made several attempts to settle, he also suggested joint expert	1		
since relationship with Mom-C, Dad suffered significant loss of assets, real property	1		
fabrication	5		
access to [GAL] reports limited to counsel of record in other case	1		
counsel fees addressed at trial	1		
Court-C denied Mom-C's motion for attorney fees, costs	1		
Court-C finds parenting time at Mom-C's discretion not appropriate, nor in best interest of Kids-C	1		
Dad may review Mom-C's responses at counsel's office only	1		
validation	6		
12-08-06 Mom-C filed for counsel fees, costs	1		
Dad has personal property, \$33,683, \$34,006, \$3,068, \$7,132, \$4,828, \$1,829	1		
Dad remained in marital home with Kids-B following divorce	1		
each party responsible, his, her [Mom-B] own attorney fees	1		
each party responsible, his, her [Mom-C] own attorney fees	1		
parties agreed Dad buy out Mom-B's half interest in home, he could keep all furnishings	1		
<b>exaggerated protection</b>	<b>2</b>		
fabrication	1		
[Dad's] counsel, Dad may not retain copies in any form of Mom-C's documents	1		
validation	1		
11-08-24 Court-C allowed to consolidate	1		
<b>massive representation</b>	<b>7</b>		
disregard	5		
12-02-15 Attys Iannuzzi, LaCivita entered appearance on behalf of Mom-C	1		
12-04-11 Atty Harris entered her appearance on behalf of Dad	1		
Attys Zupcowska, Nardone entered appearance on behalf of Dad	1		
Mom-C's acquisition of new counsel as reasons	1		
parties have been Pro Se, represented by counsel at times	1		
fabrication	1		
11-10-31 Attys Zupcowska, Nardone filed to withdraw due to Dad's economic issues - Court-C denied	1		
validation	1		
11-11-17 Attys Zupcowska, Nardone again filed to withdraw due to economic issues - Court-C allowed	1		
<b>professional child predator</b>	<b>4</b>		
disregard	3		
after Mom-B's divorce from Ryan's father, Mom-B had physical custody of Ryan	1		
Atty LaCivita represented Mom-C	1		
Mom-B represented by Atty Otis	1		
validation	1		
09-11-10 Dad sent Mom-C's Atty email pertaining to Mom-C's treatment of Kids-B	1		
<b>promised riches and control</b>	<b>19</b>		
bias	4		
11-09-22 Mom-C filed statement of fact and law in opposition	1		
11-11-25 Mom-C's Atty Foley withdrew from case	1		
Court-C finds, Mom-C with educational background, work experience, skill set to find employment	1		
Mom-C able body, educational background, work experience, skill set to find employment	1		
disregard	9		
[altered recording] [Mom-C] wants \$10,000 [per month] from me	1		
[altered recording] that's what Mom-C wants, To take you away, She wants to take kids, money	1		
[Mom-C filed] \$500,000 life insurance by Dad, for child, Mom-C as sole beneficiary	1		
11-08-17 Mom-C filed, Dad obtain \$1,000,000 life insurance policy	1		
Dad obtain life insurance of \$300,000 for the benefit of Kids-C	1		
Mom-C declined all of Dad's offers	1		
Mom-C named sole beneficiary of life insurance policy	1		
Mom-C reported weekly expenses \$1,130, \$317 rent, \$230 food, \$117 incidentals	1		
Mom-C's weekly expenses greatly exceed her weekly income	1		
fabrication	3		
Court-C attributed yearly income \$30,000 to Mom-C	1		
Court-C attributing yearly income \$30,000, \$576 per week, to Mom-C	1		
Mom-C be named sole beneficiary of life insurance policy	1		
validation	3		
[Mom-B filed complaint] Dad supervised visitation, Dad child support, Dad health insurance	1		
11-06-06 Mom-B filed for child support - Court-B denied without prejudice	1		
Mom-B entitled to claim Kids-B as dependents for tax purposes	1		
<b>protracted legal churning</b>	<b>25</b>		
disregard	7		
[coordinating professional to] see parties, make recommendations, normalization of contact	1		
11-08-24 Court-C allowed Mom-C's for the benefit of Lola	1		
Dad engaged in parallel case with ex-wife, Mom-B, regarding custody of Kids-B	1		
Dad lived off his investments, interest income since 2000	1		
Dad paid for property in cash, selling condominium for \$400,000	1		
Mom-C filed assented to extend discovery deadline - Court-C allowed	1		
supervised visitation center has policy against providing information without subpoena	1		
fabrication	3		
Court-B ordered - counsel for Mom-B read GAL report in cases of Mom-C	1		
Court-B ordered - counsel for Mom-C read GAL report in case of Mom-B	1		
further access may be sought by motion if necessary, appropriate	1		
validation	15		
11-08-04 parties filed to continue pre-trial conference from 11-08-11 to 11-11-17	1		
11-08-17 Dad filed opposition for clarification, counsel fees	1		
11-08-24 Court-C allowed motion for clarification	1		
11-08-24 parties filed to consolidate complaint[s] - Court-C allowed	1		
11-09-28 Court-C addressed Dad's motion for clarification	1		
12-08-06 first day of trial held	1		
13-02-12 parties filed assented to Alternative House to provide records	1		
13-04-29, 13-04-30 the second, third days of trial were held	1		
13-08-19 the fourth, final day of trial was held	1		
39 exhibits, 6 people testified at trial, the parties, Dr Somers, Ms Aponte Alternative House	1		
76 exhibits, 6 people testified at trial Mom-B, Dr Deutsch, Ofc Moore, Dr Kivisto, Ms Laureano, Dad	1		
Dad involved in parallel custody case with ex-wife Mom-B	1		
matter before Court-B for 5 day trial on 12-08-03, 09, 10, 12-11-16, 13-11-18	1		
matter before Court-C for 4 day trial on 12-08-06, 13-04-29, 30, 13-08-19	1		
parties heavily litigated, providing responsive pleadings, affidavits	1		
<b>target stereotypical faults</b>	<b>1</b>		
bias	1		
Dad began working with computers while taking college courses	1		
<b>trojan horse attorney</b>	<b>6</b>		
disregard	3		
Dad did not allow GAL to speak to his therapist	1		
FS 13-08-19 Dad reported attorney fees \$159,344 paid in full	1		
prohibiting Dad copies of discovery documents, ordering his counsel to retain all documents	1		
fabrication	1		
Dad continued to assert privilege until shortly before last day of trial	1		
validation	2		
Atty Harris represented Dad	1		
Dad represented by Atty Harris 4 days of trial - fifth day Dad Pro Se	1		

# Qnarre Full Report

child health fraud	129
<b>compel child to pretend</b>	<b>11</b>
disregard	4
[Leon] reported to GALs, pretends to be to keep Dad from getting angry	1
Leon reported to GALs, he pretends to be happy during visits to keep Dad from getting angry	1
Leon teased Dad persistently throughout visit	1
Lisa impersonated Dad's voice, yelled, Let's go swimming! Go Run!	1
fabrication	5
[Lisa cited] Mom-B not having to pay for dinner as her favorite parts of visits with Dad	1
after Kids-B gave Dad his present, Leon indicated, he wanted to leave	1
Dr Kivisto observed supervised visitation between Dad, Kids-B at MSPCC on 12-07-05	1
Leon also reported incident to his teacher, DCF was notified	1
Leon need to experience Dad able to be firm, without unpredictable anger, volatility Leon anticipates	1
validation	2
Lisa made the sign at 548PM	1
to end telephone conversations quickly, Leon pretends he forgot what he did during the day	1
<b>conceal medical reality</b>	<b>21</b>
bias	1
[Dad] believes consistent exercise has led to fewer illnesses for Kids-B	1
confusion	2
[Lisa] stated, Dad would make her, Leon drink spoonful of sunflower oil, it was awful	1
went on to describe Dad forcing he, Lisa to drink sunflower seed-based liquid every day	1
disregard	4
[Dad] exercise, the only thing that keeps them in check, I don't want them sick	1
[Leon] had lost 2 pounds in a week, [Dad] seemed almost obsessed about it	1
he took Leon to hospital for bladder surgery, stayed with him at hospital	1
property needed repairs, parties to renovate home, make it suitable for family	1
fabrication	8
[pediatrician's recommendations] if Lisa's BMI was 85 then, if Leon's was 10 then	1
Court-C finds, best interest of Kids-C, information related to divorce [sic] not disseminated outside	1
Dad weighed Kids-B daily, upset if Lisa weighed too much, Leon weighed too little	1
Dad weighed Kids-B every morning, attempted to follow pediatrician's recommendations	1
for example, Mom-B recently informed Dad of Leon's mole removal, ear infection	2
Kids-C are in good physical health, Luke suffers from problems with speech, language	1
the home needed extensive rehabilitation to accommodate large family	1
recast	1
TBD	1
validation	5
[Dad sent response] They don't get much exercise during the day with all the snow	1
[sandwich with milk] I do that, I have been keeping his weight at almost 52 pounds	1
he reported to GAL, gave Kids-B cod liver oil, Leon spit it back, required to drink that milk	1
Leon had major bladder repair surgery in 2008-12	1
Leon has severe allergies to peanuts, tree nuts, wasps, hornets, allergic to pollen, cat hair, dusts	1
<b>conceal PTSD in child</b>	<b>22</b>
disregard	8
[GALs recommendations] Lisa therapeutic services mental health counselor, eating disorders	1
[when Mom-B obtained custody] Leon had nightmares, sleepwalking issues	1
[when Mom-B obtained custody] Lisa experienced bed-wetting	1
Dad did not agree with Dr Goldsmith [that] Leon met diagnostic criteria for ADD	1
Dad sent Dr Goldsmith email detailing concerns regarding Dr Goldsmith's treatment of Leon	1
Dr Tempesta, Mom-B concerned Leon may have ADHD	1
Kids-B easily upset when [Mom-B] obtained custody	1
Mom-B reported [Leon] poor levels concentration, problems with impulsivity, restlessness	1
fabrication	7
[GALs recommendations] Leon mental health treatment, potential ADD problems	1
13-02-22 Leon's pediatrician, Dr Goldsmith, found, Leon met diagnostic criteria for ADD	1
2011-09 Lisa stopped wetting the bed, Leon stopped sleepwalking sometime in fall 2011	1
Court-C finds, in Kids-B's best interests for Mom-B have sole legal custody	1
Court-C found, barring dissemination of information was in best interest of Kids-C	1
Dad made poor decision regarding Kids-B's medical care when withdrew consent to therapy	1
Mom-C alleges, Dad violated order by disseminating information to pediatrician, third parties	1
validation	7
12-05-30 Dr Tempesta diagnosed Leon with adjustment disorder, disturbance of emotions, conduct	1
Dr Tempesta did not diagnose Leon with ADHD	1
given Leon's sensitivity to firm redirection reported by Mom-B	1
Kids-B's pediatrician is Dr Goldsmith	1
Leon did not continue to see her after supervised visitations began in 2011-10	1
Leon previously saw Ms Otis for therapy from 2011-06 through 2011-10	1

Ms Otis diagnosed Leon with PTSD	1
<b>disturb children for gain</b>	<b>13</b>
disregard	4
governing principle in deciding custody issues is welfare of child	1
Leon began to perform poorly in school, struggling to complete homework	1
Mom-B explained to Kids-B, purpose of visits was for Kids-B to have fun with their father	1
Mom-B told Kids-B, staff at MSPCC were there to keep them safe	1
fabrication	6
[Dad] did not agree to medication despite Leon's poor performance in school	1
[GALs recommendations] providing all professionals systemic view of family	1
Leon reported to Dr Deutsch, he wishes visit with Dad once every 500 years, then he would be dead	1
Lisa reported, she would like supervised visitation with Dad	1
Mom-B prepare Kids-B by explaining they would see their father [in safety]	1
symptoms do not decrease, repeated testing to evaluate cognitive ability, ADHD, mood	1
validation	3
Dad did not consent to therapy again until 13-07-16	1
duty of judge, consider welfare of child in reference to present, probable future	1
Leon is 10 years old	1
<b>ignore child torturing</b>	<b>21</b>
confusion	1
had breakfast, went upstairs to complete 15 mins of math exercises	1
disregard	2
consequence of volatile relationship, older Kids-B, outside of relationship suffered	1
Mom-C did not physically harm Lisa, but Lisa was understandably upset by incident	1
fabrication	7
[altered recording] [Dad] is that what you want? stop crying now!	1
[altered recording] Leon is heard crying, asking Let go of me! Dad saying I'm not doing anything	1
[altered recording] Leon then yells Let go of me Dad! to which Dad yells, Am I the best father?	1
[whistle blowing email] I did smack him on the head to sit back, stop his fit	1
Dad did not consent to therapy again until 13-07-16	1
Mom-B spoke to Dad about [altered] recording, he assured, incident stopped when recording ended	1
Mom-B talked to Dad, she worried talking to Dad, making situation worse	1
validation	11
[altered] recording itself is heart rending	1
[Mom-C provoke custody fight over Kids-B] by destroying his toys, ignoring him when getting new toys	1
[Mom-C provoke custody fight over Kids-B] by letting him wander out of house into the woods	1
[Mom-C provoke custody fight over Kids-B] by losing him in stores	1
[Mom-C provoke custody fight over Kids-B] by pinching him	1
[Mom-C] spitting big blobs of spit into Kids-B's faces	1
[Mom-C] would beat [Dad] so much, Kids-B would start crying, tell Mom-B	1
Court-B notes, recording of father screaming at his son played on last day of trial	1
Court-C believes, Dad's dissemination of information was willful	1
Mom-B talked to Dad about Kids-B's behavior	1
Sam allegedly kicked Leon in the stomach	1
<b>out-of-state out-of-reach</b>	<b>2</b>
disregard	2
Leon in therapy with Dr Lawson of Nashua, NH	1
Lisa in therapy with Dr Gallagher of Nashua, NH	1
<b>pediatrician self-protection</b>	<b>3</b>
disregard	2
Dad primarily responsible for taking Kids-B to pediatrician	1
he testified, correspondence only referenced Mom-C, discussed details available to the public	1
validation	1
Dr Goldsmith unwilling to provide medication to Leon, parents not in agreement with diagnosis	1
<b>protracted insurance fraud</b>	<b>9</b>
bias	1
Dad provides health insurance for Kids-C	1
disregard	2
Dad provides health insurance for Kids-B	1
Dad provides medical insurance for Kids-B	1
fabrication	6
11-08-04 Mom-C filed for Luke health insurance, payment of cord blood	1
Dad allow Mom-B full access, Kids-B's health insurance account	1
Dad continue provide health insurance for Kids-C	1
Dad continue provide medical insurance for Kids-B	1
Dad maintain Kids-B on his health insurance plan	1
Dad provide insurance coverage for Kids-C	1
<b>seize legal custody</b>	<b>7</b>

# Qnarre Full Report

disregard	3	Quantapix with value, no profit, \$150,000	1
Court-C finds Mom-C maintain sole physical, legal custody of Kids-C	1	<b>protracted financial fraud</b>	<b>18</b>
Mom-B have sole legal and physical custody of Kids-B	1	confusion	3
Mom-C have sole legal and physical custody of Kids-C	1	11-07-13 Court-C allowed, ordered Dad pay \$300 child support	1
fabrication	2	11-08-24 Court-C ordered, Dad pay \$300 per week child support for Kids-B	1
14-01-30 Mom-B filed, Court-B granting Mom-B sole legal custody of Kids-B	1	ordered Dad pay \$300 per week in child support	1
Dad access to records, providers, but Mom-B retain decision-making responsibility	1	disregard	1
validation	2	11-09-28 Court-C increased child support to \$342, order remains in effect	1
granting Mom-C sole legal, physical custody	1	fabrication	8
Mom-B filed for sole legal, physical custody - Court-B denied	1	Court-C finds, in best interest of Kids-C, Dad pay \$342 per week in child support to Mom-C	1
<b>waterboard children for proof</b>	<b>20</b>	Court-C has chosen to deviate from presumption	1
confusion	1	Dad continue pay \$342 per week child support to Mom-C for Kids-C	1
the court should consider wishes of child in making custodial determinations	1	Dad pay \$233 per week child support	1
disregard	8	Dad pay \$233 per week child support to Mom-B for Kids-B	1
[Mom-B] inquired, Leon reported, Dad hit him on face, back of head in the morning, did not eat breakfast fast enough	1	Dad pay child support to Mom-B \$233 [weekly]	1
best about Mom-B, does not make, do all workout stuff, no longer has to swim, run laps every day	1	Dad to pay \$342 child support for Kids-C	1
GALs conducted interviews with Kids-B	1	ordering Dad pay \$342 per week child support for both Kids-C	1
he said, gets to play, at Dad's he would only play if he ran around house 20 times first	1	validation	6
in their interviews with GALs, Kids-B described living with Mom-B as relaxing	1	11-09-14 Dad filed statement of fact and law	1
Lisa reported, she is happy living with Mom-B	1	Court-C attributing other child support \$200 per week to Dad	1
Lisa uncomfortable when GAL brought up whispering, she neither confirmed nor denied whispering occurred	1	Dad pay to Mom-C \$1,954 retroactive child support for Lola	1
Mom-B asked Lisa, she corroborated Leon's story	1	Dad pays \$342 per week child support to Mom-C	1
fabrication	5	Dad pays child support to Mom-C for Kids-C weekly \$342	1
[GALs] Leon reported, he would like to see Dad once every 500 years	1	expected child support \$200 for Kids-B	1
[Leon] went on He kept hitting me every day, I kept crying, He hit me, It was getting worse	1	<b>victimized children</b>	<b>3</b>
conversely, Lisa reported that Dad does hit Leon	1	disregard	2
Court-B considered Kids-B's opinions regarding custody, visitation	1	Mom-C reported weekly incomes of less than \$550	1
GALs ask Leon if times when he did want to speak with Dad, Leon replied, No, not at all	1	when Mom-C left Dad's home, Dad paid rent for her apartment	1
validation	6	fabrication	1
GALs asked Leon about living with Mom-B, he responded, Awesome, relaxing	1	Court-C finds, Mom-C has ability to earn a living income	1
GALs asked Leon about visits, he spontaneously said, At visitation [Dad] whispers a lot	1	<b>intractable jealousy</b>	<b>139</b>
GALs asked Lisa about living with Mom-B, Dad all workout stuff, Mom-B does not make them do	1	<b>abandoning children</b>	<b>3</b>
GALs asked Lisa about nightly telephone conversations with Dad	1	disregard	3
GALs asked what was like not having in-person contact with Dad, Lisa replied, Relaxing	1	Dad did not work for years, spending considerably, choosing to live off of interest, savings	1
when asked by GALs what he likes about visits, Leon responded, We see mom when go to bathroom	1	in early 2010, Mom-B testified credibly, she noticed Kids-B clingy during her parenting time	1
<b>exploited child support</b>	<b>42</b>	until 2011-04, Dad primary care taker, custodian of Kids-B	1
<b>paid in advance</b>	<b>8</b>	<b>coaching children to destroy</b>	<b>20</b>
bias	1	disregard	9
in 2011 after sale of family home, Mom-C received \$250,000 from Dad	1	[Mom-B prepare Kids-B by explaining, Dad would not] ask about their eating, running habits	1
disregard	1	[Mom-B prepare Kids-B by explaining, Dad would not] hit them	1
attributing income, assets to Dad, ordering child support of \$675 per week	1	[Mom-B prepare Kids-B by explaining] he would not be able to yell at them	1
fabrication	2	2012-01 Leon began telling Mom-B, Dad making him uncomfortable during visits	1
Court-C finds, Dad did not begin child support for Lola until 11-08-24	1	2012-03 Leon told Mom-B, Dad whispering to him, sister when supervisors not looking	1
Dad claimed, money Mom-C received was child support, no credible evidence to support assertion	1	having heard Kids-B about Dad whispering during visits, Mom-B talked to Kids-B	1
validation	4	Leon reported to GALs, he, Lisa don't live with Dad Cause he's mean, He hits me for no reason	1
11-09-16 Dad filed for clarification as to child support to be paid, for whom	1	Leon said liquid Terrible tasting, Made us throw up in our mouths every time	1
Dad gave Mom-C \$250,000 from the sale of the home	1	she said with Dad, same thing every day, running laps, swimming laps	1
FS 11-08-11 Mom-C's reported no debts, liabilities, assets \$167,908	1	fabrication	6
ordering Dad complete financial statement	1	2009-08 Lisa reported to teacher, argument at kitchen table, Mom-C held knife up to Lisa's face	1
<b>payments never missed</b>	<b>4</b>	according to Mom-B, Leon's anxiety evident leading up to initial visit, has not subsided	1
validation	4	Leon explained, he was nervous due to recent phone conversation with Dad	1
Court-C finds there shall not be retroactive child support for Luke	1	Leon impersonated Dad's voice, yelled, You better have a good time or else!	1
Dad full financial support Mom-C, Luke, first 1.5 year of Luke's life, regardless lived together, apart	1	Leon reported, Dad had whispered to him, Do you want to live with me?	1
Mom-C testified, Dad paid her \$5,000 child support, pursuant to order on that complaint	1	Mom-B said, after Leon ran to her, excitedly yelled, The visit better, he didn't whisper!	1
since 11-05-31, by order of Court-C, Dad has consistently paid child support for Luke	1	validation	5
<b>proactive payment protection</b>	<b>9</b>	[GAL reported] a period in which Dad was absent from Luke's life	1
bias	1	2010 Dad, Kids-B moved into apartment with Mom-C, Luke, [Sam]	1
Dad invested large portion of personal funds into his business	1	Dad, Kids-B moved into apartment with Mom-C, 2 boys	1
disregard	3	from 2010-11 to 2011-07, Dad did not have contact with Luke	1
Dad earns weekly salary \$1,346 from his company, Quantapix	1	Leon reported, Ms Laureano did not see the whispering	1
Dad has steady income, significant assets \$908,117	1	<b>existential financial threat</b>	<b>9</b>
Dad testified, his assets are exhausted, FS 13-08-19 shows assets \$908,117	1	disregard	3
fabrication	1	[Mom-B] has been using Fidelity funds to make up the difference	1
Dad created for himself yearly salary \$75,000	1	Dad testified, ex-wife [Mom-B] seeking child support, expected child support for Kids-B	1
validation	4	he reported weekly income from interest \$104, expenses \$229, child support \$675	1
11-07-13 Dad filed to amend FS - Court-C recognized updated FS	1	fabrication	2
Dad has placed himself on salary	1	[Dad] asking delay until after birth, paternity, of second child	1
Dad reported weekly income \$1,346, expenses \$1,351, including child support	1	e-mail exchanges with Mom-C, Dad renounced his relationship with Luke	1



# Qnarre Full Report

validation	4				
[Mom-C] would beat [Dad] so much, Kids-B would start crying, tell Mom-B	1				
11-05-18 Dad filed to establish child support simultaneously	1				
Dad placed both [his], Mom-C's names on deed	1				
reflective of prior to salaried income Dad living off of assets	1				
<b>maneuvering for lawsuit</b>	<b>30</b>				
bias	2				
[Mom-C's] only source of income, child support from Dad and from ex-husband	1				
Mom-C's source of income, child support from Dad and from ex-husband	1				
disregard	16				
[altered recording] [Dad] do you want to live with Mom-C? Stop the crying	1				
11-06-10 Mom-C filed for supervised visitation, citing abusive behavior towards Mom-B, Kids-B	1				
11-06-27 Mom-C filed Complaint for support-custody-visitaton for Lola	1				
2009-11 Mom-B attempted to obtain restraining order against Mom-C	1				
2010-02 Mom-B received email from Mom-C with [secret, altered] recording attached	1				
allegations of physical, emotional abuse have been made by both, abuse against both Kids-B, adults	1				
as a result of Mom-C moving out, DCF investigation was closed	1				
birth of first child in 2009 did not change relationship	1				
GAL notes, e-mails from Dad contained very concerning attitudes toward Luke	1				
I noticed that Mom-C was again recording us	1				
living arrangement did not last, Dad, Kids-B moved back into Dad's home	1				
Mom-C sought child support, child's health insurance by Dad	1				
older Kids-B subject, source of verbal altercations, allegations of physical abuse	1				
parties engaged in ongoing discussion, of negative details of relationship, parenting, Kids-B	1				
past behaviors, renouncing his relationship to Luke, [Dad's behavior concern to Court-C]	1				
resulted in DCF investigation, closed after Mom-C moved out of home	1				
fabrication	5				
[altered recording] Mom-B testified, was afraid to take action, was not sure had enough proof	1				
[Lisa] told her teacher about Mom-C's actions, led to DCF investigation	1				
[whistle blowing email] Leon got smacked this morning for backtalking	1				
[whistle blowing] 11-02-26 Dad acknowledged to Mom-B, hitting has to stop	1				
2009 Mom-C filed paternity action, but she later dropped the complaint	1				
validation	7				
2010-02, Dad, Kids-B moved out of apartment	1				
2011-01, it sold for only \$500,000, \$300,000 less than purchase price	1				
Dad has 9 year old Kids-B from previous marriage	1				
Lisa was over 54 pounds, Leon barely hit 50 Monday	1				
Mom-B took Kids-B to meet their new sister, Lola	1				
Mom-B, Mom-C communicating on regular basis since 2011-04	1				
Ofc Moore's on scene, Dad referred numerous times to size, saying he was too skinny	1				
<b>projecting guilt</b>	<b>1</b>				
disregard	1				
Leon often unexpectedly started sobbing, Kids-B did not explain to her why this happening	1				
<b>sweeping endless envy</b>	<b>19</b>				
bias	2				
according to Dad, Mom-C held a knife up to Lisa's face	1				
prior to salary, Dad upper class lifestyle, living off of interest, significant savings, assets	1				
confusion	1				
from day one [Mom-C] has maintained [Mom-B] should have custody of Kids-B	1				
disregard	6				
[due to problems in relationship] issues of favoritism with each parent, his or her biological child	1				
Dad disregarded physical, emotional safety, exposed Kids-B to relationship with Mom-C	1				
DCF conducted several investigations of their home, allegations made therein	1				
each party accused the other of favoring his, her respective child	1				
GAL found, both played role in contentious relationship, engaged in inappropriate behavior	1				
relationship of parties contentious at best	1				
fabrication	3				
[altered recording] Mom-B testified, things improved for short period after	1				
due to information Dad reported to her, Mom-B did not have positive opinion of Mom-C	1				
while the repairs, parties attempted to live together for the final time	1				
validation	7				
[Mom-B] notes, his activities with Kids-B testament, cares about their success	1				
2008-08, Mom-C suffered miscarriage, parties acknowledge, Dad biological father of child	1				
even Mom-B reported, Dad's parenting strengths, wants Kids-B successful in life	1				
fall of 2008, Mom-C pregnant with second child for Dad	1				
Mom-C 41 years old	1				
Mom-C maintains, Dad hired her for his startup, promised significant salary	1				
parties never able to live in the home	1				
<b>terrorizing with lawyers</b>	<b>27</b>				
disregard	9				
09-11-12 Dad sent Mom-B email, why he believed Mom-C serious threat to Kids-B	1				
allegations, accusations of abuse continued, Mom-C, Dad lived together, lived apart	1				
Dad sent e-mails to Mom-C, Mom-B, relatives, discussing Mom-C, Kids-B	1				
Dad, more consistent presence in Luke's life from birth until 1 year, 4 months old	1				
I made sure to include messages to whomever Mom-C gives [altered] recording to	1				
Mom-C called the police alleging, Dad attempted to strangle her	1				
Mom-C took [secret, altered] audio recording of Dad and Leon	1				
Mom-C, Dad allege, the other party abusive, physically, emotionally, to Kids-B outside of relationship	1				
result of heavy, constant conflict, many periods in which Mom-C, Dad lived apart	1				
exclude	1				
TBD	1				
fabrication	10				
[Mom-B] often threatened to call 911, fight to take custody of them	1				
[Mom-C] picking a public fight with [Mom-B] in front of the kids	1				
10-05-25 Dad sent Mom-B [whistle blowing] email confirming he hit Leon	1				
2010-04 Dad, Mom-C having disagreement regarding baptism of Luke	1				
Dad sent hundreds of inappropriate e-mails discussing paternity action	1				
due to problems in relationship, Mom-C spitting at Dad's Kids-B	1				
GAL concerned, Dad renounced, willing to relinquish, relationship with Luke	1				
GAL reported concerning behavior by Dad	1				
Mom-B took care of Lisa during that time	1				
parties had very dysfunctional on, off again relationship	1				
validation	7				
[parties had] broken engagements, large verbal altercations, allegations of abuse	1				
11-05-13 Dad filed to appoint GAL	1				
2010 Dad purchased \$800,000 home for family, placing Mom-C's name on deed	1				
2010-01 Dad purchased home for family in Concord, MA for \$800,000	1				
Dad, Mom-B in custody dispute over their 2 Kids-B	1				
Mom-B sent [altered] recording to her then counsel, did not take legal action	1				
motives of Mom-C in making recording may reasonably be questioned	1				
<b>women viciously bullying</b>	<b>30</b>				
confusion	4				
Dad is no longer able to provide [as] he did at beginning of relationship with Mom-C	1				
during that period, Dad, Mom-C lived together off and on	1				
Mom-C not portrayed positively, contact with her, not called as witness	1				
notwithstanding the separation, parties became engaged	1				
disregard	9				
[altered recording] additionally, Dad agreed to take anger management classes	1				
[altered recording] Mom-C wants to prove I am bad father She wants you to go away from me	1				
[due to problems in relationship] Mom-C, Sam moved out of Dad's home, in with her parents	1				
[Mom-C] tried to provoke custody fight over [Kids-B]	1				
[whistle blowing email] situation extremely volatile despite all my efforts to pull things together	1				
12-08-06 Dad filed to exclude unauthorized [altered] recording of Dad	1				
during that time, relationship was strained at best	1				
e-mails often critical, insulting of Mom-C	1				
Mom-C, Dad had issues dealing with the other party's child	1				
fabrication	8				
11-11-15 GAL completed report on custody, visitation, e-mails between Dad, Mom-C	1				
Court-B finds, Dad's decision, expose Kids-B to hostile relationship, lack of consideration	1				
Mom-C's [response] allegations of physical, emotional abuse by Dad toward she, Kids-B	1				
parties extensive history of conflict, unable to communicate without tension, dispute	1				
relationship between Mom-C, Dad extremely strained during this pregnancy	1				
relationship persisted in conflict, dysfunction	1				
turmoil in couple's relationship resulted in physical altercation in 2009-01	1				
unfortunate parties volatile history, need to learn to communicate for Kids-C	1				
validation	9				
[Mom-C] hitting [Dad] too many times to count	1				
[Mom-C] spitting big blobs of spit into Kids-B's faces	1				
2009-01 Mom-C left brownies with tree nuts on kitchen counter	1				
2009-08 Mom-C became engaged in argument with Kids-B at kitchen table during dinner	1				
according to Dad, Mom-B would hear about Mom-C's behavior from Kids-B	1				
Dad testified, he, Mom-C never had [professional] working relationship	1				
Mom-C has 11 year old son from previous marriage	1				
Mom-C moved out of the home shortly following incident	1				
spring of 2010, while in separate residences, [Mom-C, Dad] became engaged	1				
<b>lucrative high conflict</b>	<b>143</b>				

# Qnarre Full Report

<b>churn parents with children</b>	<b>27</b>		
confusion	2		
parties provide Dr Deutsch consent, speak with Kids-B's school officials, DCF, any collaterals	1		
report include recommendations to custody, visitation	1		
disregard	11		
11-08-17 Mom-C, with counsel, filed another clarification regarding parenting - Court-C allowed	1		
11-08-23 Court-C allowed Mom-C's clarification filed on 11-08-04	1		
12-08-06 Dad filed opposition to Mom-C's counsel fees, costs	1		
Court-C does not find, either party unnecessarily delayed proceedings, burdened Court-C	1		
Court-C finds, each party pay his, her own respective attorney fees, costs	1		
Dad does not oppose Mom-C having sole physical, legal custody	1		
Dr Kivisto reported, Dad remained calm, patient, laughed along with Leon's teasing throughout visit in Dad's care Kids-B participated in swimming, baseball, karate, soccer, music lessons	1		
Mom-C filed for clarification regarding Dad's Saturday parenting time - Court-C allowed supervisor at Alternative House informed Kids-B, they could choose not to attend visit, end visit early this matter came before Court-C for hearing 18-05-16	1		
fabrication	7		
13-06-13 Leon informed supervisor, did not want to visit until Dad apologized for 2 years ago	1		
Dad continue with Drs Harrison, Goldblatt, Leon continue Dr Lawson, Lisa continue Dr Gallagher	1		
Dad unilaterally decided to stop seeing therapist, parenting coach, visitation remain supervised	1		
Dr Deutsch, Dr Olezeski first GAL report 11-08-30, Dr Deutsch, Dr Kivisto updated report 12-07-23	1		
Dr Kivisto contrasted observation of Dad, Mom-B	1		
interacted positively, done well, Dad on trajectory to develop parenting skills	1		
judgment stated, best interest of Kids-C, information not disseminated outside of Court-C by Dad	1		
polarize	1		
TBD	1		
validation	6		
11-08-08 Mom-B filed expand GAL investigation to include removal	1		
Court-B finds Dad very invested in Kids-B's success	1		
Dad interacted positively, done well for rebuilding relationship with Kids-B	1		
Dr Kivisto reported, Leon appeared to enjoy his time with both parents	1		
real estate losses, multiple lengthy litigations, new business venture strain on Dad's finances when determining child custody awards, guiding principle has always been best interest of child	1		
<b>conjecture a pattern</b>	<b>13</b>		
disregard	4		
[Leon] was louder, more boisterous, had greater difficulty staying on task with Dad	1		
Dad reported, Kids-B upset when Mom-C encouraged Sam to break toys, Mom-C broke toys herself	1		
Mom-B attributed, MSPCC think [Dad] is wonderful, They drank his cool aid	1		
Sam often fights over toys, Mom-C would tell Sam to break Leon's playthings	1		
fabrication	7		
[parties] unable to work together to co-parent, make decisions for Kids-C	1		
11-07-13 Court-C denied joint custody, parties unable to communicate, effectively co-parent convincing evidence, information in correspondence "related to divorce [sic]", prohibited	1		
Court-B finds, parties unable to communicate in best interests of Kids-B	1		
Court-B finds, while Ms Laureano may never have observed, whispering could have occurred from testimony, evidence, conduct, parties incapable of effectively co-parenting Kids-B	1		
Kids-B feel uncomfortable when Dad, paternal grandparents speak in Hungarian	1		
validation	2		
no allegations of abuse directed at either parent regarding Kids-C	1		
routine started when Kids-B were only 5 years old	1		
<b>destabilize to provoke</b>	<b>13</b>		
bias	1		
Dad filed to compel Mom-B to refrain from harassing MSPCC - Court-B taking no action	1		
confusion	1		
parties flexible, telephone conversations, with consideration to extracurricular activities	1		
disregard	4		
[9 months later] 2012-07 Mom-B relocated with Kids-B to Westford, MA	1		
[Mom-B] reported to GAL, Kids-B difficult time speaking to Dad on daily basis, attempt to avoid it	1		
Ms Laureano responded adamantly, repeatedly stated That can't be happening!	1		
supervised visitation occur at location other than MSPCC	1		
elevate	1		
TBD	1		
fabrication	2		
[11-10-03] Mom-B granted permission to relocate Kids-B to NH	1		
their behavior got to the point, both standing in Dad's face, pointing in his face, teasing him loudly	1		
validation	4		
12-05-24 Mom-B filed to investigate waiver of Kids-B's patient-therapist privilege - Court-B denied case is scheduled for trial in days, action on [Mom-B's] motion unreasonable	1		
	1		
		Court-B order Atty Peterson accommodated - not expansion of time, when testimony taken	1
		Mom-B no longer lives with Mr Watson, she moved with Kids-B to Westford, MA on 12-07-10	1
		<b>expand feeder network</b>	<b>6</b>
		disregard	4
		[GALS recommendations] link between Dr Harrison, therapists replace need family therapist	1
		[GALS recommendations] one possible person, Dr Furstenberg in Newton	1
		GALS procedure to gradually transition supervised [to] unsupervised visitation	1
		observations of Dad optimize Dr Harrison's services, opportunity to link services with Kids-B's therapy	1
		fabrication	2
		Dr Harrison coordinate with Drs Lawson, Gallagher regarding readiness to unsupervised visitation	1
		participation of Kids-B's therapists, Dad's therapist, Dad's parenting coach	1
		<b>feeder network extortion</b>	<b>13</b>
		disregard	3
		Kids-B attend therapy every other week	1
		parties benefit from parenting coordinator, better communicators, work together as parents	1
		process involve supervisor for transitions, unsupervised contact for increasing time in middle of visit	1
		fabrication	6
		[GALS recommendations] Leon psychiatric consultation to rule out ADHD	1
		cost of supervision paid 100% by Dad	1
		Court-C recommends parenting coordinator, aid communication, improve relationship for Kids-C	1
		Dad paying the visitation costs	1
		Dad responsible for cost of supervised visitation	1
		parties split cost of GAL evaluation/assessment equally	1
		perpetuate	2
		TBD	2
		validation	2
		[Dad reported] \$220 per week for supervised visitation Kids-C	1
		Dad testified, \$110 per week for supervised visitation Kids-B	1
		<b>fragment to provoke</b>	<b>7</b>
		disregard	1
		Dr Deutsch testified credibly, pattern confusing for Kids-B, create feelings of unpredictability	1
		fabrication	1
		Lisa said, she enjoys telephone calls, wants to continue having one call per night with Dad	1
		validation	5
		11-05-16 Mom-B filed injunctive relief - Court-B denied	1
		11-07-13 Court-C denied, noting parallel case, Mom-B, addressed dissemination on 11-05-16	1
		12-05-24 Mom-B filed to appoint attorney for Kids-B - Court-B denied	1
		dad of 4 kids, custody before Family Court, 2 in [Mom-B] case, 2 in paternity cases [Mom-C]	1
		he values stability, learning to solve problems on your own	1
		<b>high yield targeting</b>	<b>15</b>
		bias	2
		[house] Concord, MA with no mortgage, fair market value \$2,690,000	1
		Mom-C Bachelor's in Exercise Physiology, UMass Lowell	1
		disregard	6
		additionally, Mom-B owns home located Pittsford, VT	1
		Dad has worked hard his entire adult life	1
		Dad is a Metrologist, entrepreneur	1
		Mom-B has Fidelity Brokerage accounts \$1,227,103, \$93,205	1
		Mom-B owns, Westford, MA property, fair market value \$550,000, not subject to mortgage	1
		VT property, fair market value \$252,000, not subject to mortgage	1
		fabrication	1
		parties started business together, both received several million dollars from sale of business	1
		validation	6
		11-08-08 Mom-C filed for counsel fees of \$25,000	1
		Dad 52 years old	1
		Dad attended special high school for mathematics, physics	1
		Dad has Master's in Math from Romania, Master's in Computer Science from BU	1
		he has Bachelor's in Math, Master's in Computer Science from BU	1
		software valued at ~\$25M	1
		<b>invalidate to provoke</b>	<b>11</b>
		confusion	2
		[GAL] found Dad's behavior around Kids-C appropriate	1
		GAL did not have objections to Dad's treatment of Kids-C	1
		disregard	3
		Dad's Atty notified GALS, Dad not waiving privilege to allow GALS to speak with Dr Goldblatt	1
		Kids-B participated in videotaped sessions with Dr Harrison, Dad	1
		Mom-B raised [whispering] concern with Ms Laureano at MSPCC during next visit	1
		fabrication	4

# Qnarre Full Report

[GALs recommendations] Dad to obtain therapeutic services	1
[GALs] conducted testing sessions with Mom-B, Dad	1
Dad testified on last day of trial, no longer seeing Drs Harrison, Goldblatt	1
Dad's motion to reappoint GAL is denied	1
validation	2
[Court-B] don't reach issue of privilege, in a custody case is not absolute	1
Dad NOT GUILTY of Contempt as filed in Mom-C's Complaint for Contempt on 13-03-22	1
<b>stereotypical targeting</b>	<b>15</b>
disregard	7
[Lisa] reported, telephone calls consist of talking about what she did that day	1
Dr Kivisto observed, Kids-B teased Dad consistently throughout visit, pointed out how bad Dad was	1
Leon left, Lisa stayed with Dad for the scheduled time	1
Lisa cited getting to play, getting what she wanted for dinner [as favorite parts of visits with Dad]	1
Lisa indicated, she wanted to visit with Dad	1
when GALs asked Lisa about visits with Dad, she said visits have been pretty good	1
worked as executive assistant, testified to having been dog walker in recent years	1
fabrication	2
GAL discovered, Lisa reported to Ms Henry, Dad does not hit her, I do all my math work, fast	1
Leon said, Lisa saw Dad hit him, noted that he only observed Dad slap Lisa once on the cheek	1
insinuate	1
[Ms Henry, never acceptable to hit a woman, child] Dad replied But they didn't do what I asked	1
validation	5
Court-C does find, in recent years Dad's financial circumstances have changed for worse	1
Dad's parents retired - mother medical doctor, father biochemist	1
Mom-B has not worked in twelve years	1
Mom-C does not own real property, rents apartment, \$1,375 per month	1
Mom-C is a stay at home with her Kids-C	1
<b>uproot to provoke</b>	<b>22</b>
bias	1
Court-B temporary order Mom-B have care, custody of Kids-B	1
disregard	6
11-06-01 Dad filed request continuation Kids-B's activities - Court-B denied	1
12-09-26 Mom-C to replace supervisor, citing relationship with Dad - Court-C allowed	1
12-09-26 Mom-C to replace visitation supervisor, citing hostile environment - Court-C allowed	1
2013-01 until 13-11-06 Dad's visits occurred at Alternative House	1
Kids-B attended school in Westford for 2012-2013 school year	1
policy also stated, after records of are subpoenaed, individual is unable to continue visitations	1
fabrication	5
12-10-03 Court-C allowed Mom-C to replace visitation supervisor	1
In 2012, Kids-B moved to Hudson, NH school system	1
Mom-B did not inform Kids-B about move, she did not want them keeping secret from Dad	1
Mom-B said, Kids-B felt close to Ms Laureano, distraught at their concerns brushed off by her	1
visits changed to Thursday, Leon's baseball schedule conflicted with Saturday visitation	1
validation	10
11-05-02 Mom-B filed complaint for modification - physical custody, remove Kids-B to NH	1
12-03-01 Mom-B filed to alter supervised visitations - Court-B denied	1
12-10-01 Dad filed opposition	1
custody order 11-05-02 remain in effect	1
denying motion until custody is clearer will provide Kids-B with stability	1
Kids-B attended school in Concord, MA for 2010-2011, start of 2011-2012 school year	1
Kids-B's schools not be changed pending further order	1
Mom-B filed to allow to enroll Kids-B in NH school - Court-B denied	1
Mom-B filed to change visitation center - Court-B denied	1
Mom-B resides at Westford, MA	1
<b>(blank)</b>	<b>1</b>
proof	1
2 Kids-B born of parties' marriage	1
<b>mental health madness</b>	<b>51</b>
<b>elites dominate</b>	<b>6</b>
disregard	2
12-04-11 Mom-C filed to release GAL reports of Dr Somers, Dr Deutsch to her expert witness	1
either GAL may read GAL report in other case	1
fabrication	2
[GAL reports to therapists] Court-B allowed Dr Deutsch only, denied Dr Somers	1
report by Dr Deutsch distributed to all mental health professionals	1
validation	2
12-04-11 Court-C allowed Mom-C to release GAL reports to expert - only Dr Somers report	1
Dad filed [simultaneous] GAL reports by Drs Deutsch, Somers released to therapists	1

<b>massively invalidate</b>	<b>16</b>
bias	2
[Mom-C testified, Dad] agreed to pay her salary \$6,000 per month	1
Court-C finds, best interest of Kids-C, parties improve volatile relationship	1
disregard	4
11-09-14 Mom-C requesting counsel to read report by Dr Deutsch, GAL, parallel case - Court-B allowed	1
12-03-02 Dad filed to vacate report of Dr Deutsch, GAL in parallel case between Dad, Mom-B	1
Dad does not oppose Mom-C maintaining sole physical, legal custody of Kids-C	1
in process of remodel, home gutted, inhabitable	1
fabrication	9
[during divorce Dad, Mom-B split] including stocks from sale of software	1
[Mom-C] testified, he was a great father, contributing to cooking, helping to care of Kids-B	1
12-07-26 Ms Laureano questioned ice-creams contained nuts, advised Dad not to give to Kids-B	1
at divorce, Dad received 60% of marital assets, stocks, proceeds from sale of the program	1
Dr Deutsch testified, Leon reported, pretends to be happy with Dad to prevent from becoming angry	1
history, relationship, Dad's personal history [supervised parenting needed]	1
report by Dr Deutsch distributed to all mental health professionals	1
since relocating to the US, Dad worked countless jobs in computer industry	1
while married to Mom-B, Dad developed software valued tens of millions of dollars	1
validation	1
Dad denies ever whispering to Kids-B during visits	1
<b>possible personality disorder</b>	<b>12</b>
bias	3
[Court-B] find, any evidence from mental health treaters outweighed by prejudice [to] Mom-B	1
any evidence Dad [has] to therapy substantially outweighed by unfair prejudice to Mom-B	1
born in Romania, Dad, his family moved to the US when he was young adult	1
confusion	4
11-05-25 Court-C allowed Dad's to appoint GAL, Dad pay retainer, costs	1
Court-C appointed Dr Somers, GAL, investigate supervised parenting, physical custody	1
Dr Deutsch appointed GAL for independent evaluation/assessment custody, visitation	1
Dr Deutsch provide Court-B report her evaluation/assessment	1
disregard	1
GAL highly recommended, parties continue individual counseling, parenting courses	1
fabrication	4
[Court-B] find, any evidence from mental health treaters outweighed by prejudice [to] Mom-B	1
Court-C finds, best interest of Kids-C, Dad continues individualized therapy	1
in addition to alleged physical, verbal altercations between parties	1
relationship begun on high note, but quickly dysfunctional	1
<b>post-communist informants</b>	<b>1</b>
disregard	1
[GALs interviewed] Dr VonBremmen, Dad's mental health consultant	1
<b>refined totalitarian tool</b>	<b>7</b>
disregard	1
reappointment of Dr Somers, GAL to provide updated report - [denied]	1
fabrication	5
[Dr Deutsch to report on] Kids-B tolerating supervised visits	1
12-05-29 Dr Deutsch to report on Dad behaving inappropriately during supervised visits	1
Court-C not been provided, evidence regarding Dad's progress in individual counseling	1
Dad continue to attend individual therapy sessions	1
in the best interest of Kids-C, Dad continues individual therapy	1
validation	1
Dad seeing Dr Harrison, parenting coach, weekly, also seeing Dr Goldblatt, psychiatrist, weekly	1
<b>shield and sword privilege</b>	<b>5</b>
disregard	2
12-12-03 Dad filed offer of proof to waive patient-psychotherapist privilege	1
12-12-03 Dad filed offer of proof to waive privilege	1
fabrication	1
Dad's response regarding PTSD evidence denied	1
validation	2
13-11-16 Dad filed response regarding PTSD evidence, to waive his patient-psychotherapist privilege	1
13-11-16 Dad filed response seeking to waive his patient-psychotherapist privilege	1
<b>splinter target to fit</b>	<b>4</b>
disregard	1
[Mom-C] testified, left her position, executive assistant, to work with Dad	1
fabrication	2
12-12-19 Court-C ordered Exhibit B [Dad's psychiatry report by Dr Bursztajn] stricken on Dad's motion	1
Dad believes, represents Leon testing him, as if to say, What are you going to do now?	1
validation	1

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appointing GAL investigate child custody, parenting time	1	Mom-B initiated visitation between Kids-B, grandparents	1
<b>paternal alienation</b>	<b>114</b>	validation	1
<b>external supervision</b>	<b>21</b>	[Dad requesting] permission for Dad's parents to participate in his parenting time	1
disregard	3	<b>restrict paternal contact</b>	<b>22</b>
Dad continue supervised parenting time with Kids-C	1	disregard	7
Dad have supervised parenting time with Kids-B	1	[Lisa reported] she sees Dad just the right amount of time	1
Dr Harrison coordinate Dad's, Kids-B's readiness to begin unsupervised visitation	1	11-05-16 Court-B ordering Dad may have telephone contact with Kids-B once per day	1
fabrication	12	Dad continue 2 hours of supervised parenting [Kids-C, weekly]	1
[Court-C awarded] Dad supervised parenting time	1	Dad continues supervised parenting time with Kids-C, at Alternative House, 2 hours Friday[s]	1
continued supervised parenting needed	1	GALS recommendations supervised visitation between Dad, Kids-B 1-2 hours per week	1
Court-B finds, supervised visitation with Dad continues in Kids-B's best interests	1	GALS recommended, supervised visitation remain in place	1
Court-B will not consider making visitation with Kids-B unsupervised	1	shift from supervised to unsupervised parenting gradual, progressive	1
Court-C finds continued supervised parenting with Dad in best interest of Kids-C	1	fabrication	11
Drs Harrison, Lawson, Gallagher, family therapist believe [when] prepared to unsupervised visits	1	[Kids-B parenting] time based on agreement, availability (maximum 2 hours)	1
GALS found, Dad need to redirect Leon in safety of supervised environment to minimize Leon's anxiety	1	11-05-16 Court-B ordering Dad may have telephone contact with Kids-B once per day	1
important for Dad, limits with Leon in safety of supervised environment to minimize Leon's anxiety	1	2011-10 supervised visits at MSPCC - Dad had weekly 2 hour visits [Kids-B]	1
Kids-B need sense of safety, predictability around Dad, supervised setting remains optimal	1	by choice Dad has only 2 hours of parenting with Kids-C	1
Kids-B need, reestablish sense of safety, predictability around Dad, supervised setting optimal	1	Dad have supervised visitation Kids-B at MSPCC Saturday for 2 hours	1
Leon's teasing, done in safe, supervised setting, one way Leon working through his fear	1	Dad may telephone contact Kids-B 3 times per week	1
supervised parenting time between Dad, Kids-C to continue	1	Dad may telephone Kids-B once per day	1
validation	6	Dad's parenting time be supervised by someone chosen by Mom-C	1
13-06-17 Dad filed for Alternative House to provide records - Court-B allowed	1	ordering Dad's parenting time at supervised visitation center	1
2011-07 Dad began court ordered supervised parenting with Kids-C	1	to diffuse tension, Dad have telephone contact with Kids-B 3 times per week	1
Dad provide subpoenaed notes from the supervising visitation center	1	visitation scheduled one day a week from 4PM to 6PM	1
no evidence for Dad's parenting time with Kids-C at Alternative House inappropriate, harmful	1	validation	4
visitation records from MSPCC do not report any concerns with Dad, his behavior with Kids-C	1	11-10-03 Dad filed for parenting time - Court-B allowed	1
visits occurred on Saturdays until approximately 2012-05	1	12-03-05 Dad filed seeking additional parenting time - motion denied	1
<b>forceful dissociation</b>	<b>17</b>	Dad filed to clarify calling routine - Court-B allowed	1
confusion	2	From 11-04-28 Kids-B have resided with Mom-B	1
[GALS asked Lisa] said that she, Leon didn't have to worry about him	1	<b>sabotage paternal contact</b>	<b>41</b>
sustainable relationship with Dad in best interest of Kids-C	1	bias	1
disregard	3	Dad has caring, appropriate relationship with Kids-C	1
[Dad uncomfortable] as his stated desire to have visits be enjoyable for Kids-B	1	confusion	5
Mom-B testified credibly, Kids-B do not enjoy telephone calls	1	if Dr Deutsch recommends in-person contact, Dad and Kids-B, parties urged to agree	1
supervisor, Kids-B decided upon a sign Kids-B would make if wanted visit to end	1	ordering parenting time with Dad, Kids-C at Alternative House	1
fabrication	6	parties urged to cooperate in changing schedule to facilitate extracurricular activities	1
[GALS recommendations] continued extracurricular activities for Kids-B	1	telephone conversations Mondays, Wednesdays, Fridays 8PM	1
12-07-05 Dr Kivisto observed 2 hour supervised visit between Dad, Kids-B	1	visitation commence as soon as Ms Brice available	1
Dad not present at Lola's birth, not signed voluntary acknowledgement of parentage	1	disregard	26
each party record conversations, Mom-B notify Kids-B conversations recorded	1	[Kids-B chose not to attend] 13-04-18	1
Mom-B responsible, cost of Kids-B's extracurricular expenses	2	[Kids-B chose not to attend] 13-05-23	1
polarize	1	[Kids-B chose not to attend] 13-07-11	1
TBD	1	[Kids-B chose to end visits early] 13-08-01	1
validation	5	[Kids-B chose to end visits early] 13-08-08	1
[Dad] requesting unsupervised parenting time with Kids-C	1	[Kids-B chose to end visits early] 13-08-15	1
12-07-12 Dr Kivisto observed Mom-B, Kids-B in his office	1	[Kids-B chose to end visits early] 13-08-28	1
joint legal custody, mutual responsibility, involvement by both parents in major decisions	1	[Kids-B chose to end visits early] 13-09-04	1
Ryan went to boarding school for 6, 7, 8 grade, then lived with Mom-B throughout high school	1	[Kids-B chose to end visits early] 13-09-11	1
whether parent able, willing to encourage child, positive relationship, non custodial parent	1	[Kids-B chose to end visits early] 13-09-18	1
<b>forever conflict</b>	<b>8</b>	[Kids-B chose to end visits early] 13-09-26	1
disregard	4	[Kids-B chose to end visits early] 13-10-02	1
[GALS recommendations] level of supervision should be gradually reduced	1	[Kids-B chose to end visits early] 13-10-16	1
[GALS] supervised visitation remain in place	1	[Kids-B chose to end visits early] 13-10-23	1
Dad was present, appeared Pro Se	1	[Kids-B chose to end visits early] 13-10-30	1
Mom-C was present, appeared Pro Se	1	[Kids-B chose to end visits early] 13-11-06	1
fabrication	3	13-04-25 Kids-B informed supervisor, were afraid to visit with Dad, visitation did not occur	1
Dr Kivisto found, it appears Leon still anticipates unpredictable anger from Dad	1	13-05-09 Kids-B told supervisor, wanted to stay for one-half of scheduled time with Dad	1
Leon continues to experience anxiety surrounding visitation	1	13-05-16 Kids-B informed supervisor, did not want to visit with Dad, visitation did not occur	1
until Dad completed parenting course, reports from counseling, supervised visitation with Kids-C	1	13-07-18 Leon made the signal for visit to end, visit ended	1
validation	1	between 2011-04, 11-10-22 Dad did not have visitation with Kids-B	1
since start of litigation, Dad has seen Kids-C on a more consistent basis	1	canceling visits, [Dad's behavior concern to Court-C]	1
<b>paternal family exclusion</b>	<b>5</b>	Kids-B chose not to attend 13-04-11	1
confusion	1	Kids-B chose to end visits early 13-07-25	1
paternal grandparents visited at center around Christmas, Kids-B's birthdays	1	number of cancellations of the one day per week scheduled parenting time by Dad	1
disregard	2	when asked about nightly telephone calls with Dad, Leon reported to GALS, we beg [Mom-B] not to	1
Mom-B requested additional supervisor be present when the grandparents are present	1	fabrication	4
parties to accommodate scheduling conflicts such as family events	1	[phone calls, Mom-B] [Dad] wants to know specific details, stressful for Kids-B to recall	1
fabrication	1	[phone calls] Mom-B noted, Dad asks similar questions each night, stressful for Kids-B	1

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by instigating Dad over and over, seeing Dad not responding angrily, Leon able to alter expectations	1
Court-B finds, nightly telephone conversations constant source of tension	1
validation	4
Dad has 2 hours per week supervised parenting time with Kids-C	1
Mom-B did not inform Kids-B about move, she did not want them keeping secret from Dad	1
Mom-C cited Dad's diminished relationship with Luke	1
telephone call at 8PM each day, Mom-B forward home call to cell phone	1
victimize	1
TBD	1
<b>permission to publish</b>	<b>6</b>
<b>harm principle respected</b>	<b>1</b>
validation	1
I have waived all my privileges, I have paid all my dues	1
<b>offense principle respected</b>	<b>1</b>
validation	1
I have no personal information, all documents have already been widely disseminated	1
<b>pure freedom of expression</b>	<b>4</b>
disregard	2
17-07-18 Dad sent email Dear All, I intend to publish all in my possession	1
actions not disseminated outside this court case by Dad without prior approval of Court-C	1
fabrication	1
Dad to refrain from publishing, communicating information to outside of Court-C without approval	1
validation	1
in violation of judgment, dated 14-02-13, on 17-10-23 17-12-29 and 18-01-19	1
<b>predatory feminism</b>	<b>230</b>
<b>deceive for advantage</b>	<b>10</b>
disregard	3
Mom-C cited advanced pregnancy, Dad's unwillingness to reschedule	1
recording of father screaming at his son played on last day of trial	1
status of working relationship of little consequence	1
fabrication	2
Mom-B lived with her long-time boyfriend, Mr Watson	1
Mom-B now resides in NH	1
validation	5
11-09-14 Court-B order pertaining to access, review of the GAL reports	1
Court-C, by agreement of parties, continued to 11-07-13	1
Dad filed to quash subpoena duces tecum - Court-B allowed	1
Dad resides at Concord, MA	1
Dad testified, he spent \$60-70K rehabilitating the property	1
<b>deceive to destroy</b>	<b>29</b>
confusion	2
Ms Laureano did not find Kids-B to be anxious, nervous around Dad	1
visitation supervisor at MSPCC, Ms Laureano testified, Kids-B were not reluctant to greet Dad	1
disregard	8
[GALS] collateral contacts, interviewed Ms Henry, Ms Walsh, first grade teachers	1
13-03-22 Mom-C filed contempt, Dad violated order by releasing information on 13-03-13	1
Dad noted that he spans Leon more often, as he reportedly pushes the limits more	1
Dad's Atty notified GALS, Dad not waiving his privilege to allow GALS to speak with Dr Goldblatt	1
in [altered] recording, Dad heard screaming at Leon after arguments with Mom-C	1
Mom-B described her relationship with Dad post-divorce as tense, chaotic	1
Mom-B reported to GALS, Kids-B stressed out prior to first visit with Dad	1
Mom-B testified she believes Dad manipulated both herself, Mom-C	1
fabrication	15
[altered recording] sound of hitting someone is heard, with increase in crying from Leon	1
51A filed by DCF, complaint for domestic assault on Leon filed by Concord Police	1
Dad extremely mad, starts difficult math questions when realizes Leon pretending to have forgotten	1
Dad lives comfortably on income, assets	1
Dad's Atty notified GALS, Dad not waiving privilege to allow GALS to speak with Dr Goldblatt	1
GAL asked Dad about chores, he stated Kids-B would run 10 laps around house after they woke up	1
Leon reported Mom-B, Dad hitting him, afraid to go home to Dad	1
Leon reported to Mom-B, school, Dad hitting him, afraid to go home to Dad at night	1
Mom-B reported to GAL, Leon consistently expressed fear to her, Dad will hit him during visits	1
Mom-B reported to GAL, Leon consistently expressed fear to her, Dad will yell at him during visits	1
Mom-B was unable to conduct discovery regarding Dad's therapy	1
Ms Henry, reported to GALS, school principal informed Dad, never acceptable to hit a woman, child parties met at dance class in 2007-12, both Mom-C, Dad were married at the time	1
while this was occurring, Mom-B took care of Kids-B	1
whispering occurred when supervisors talking with each other, Ms Laureano in her office	1

validation	4
11-12-19 Dad purchased condominium at Concord, MA for \$355,000	1
Court-B admitted, in part, the report of Ofc Charles Moore	1
Court-C does not find [Mom-C's] testimony wholly credible	1
Mom-B's home in Westford is 4 bedroom, 2 bathroom residence	1
<b>deceive to originate</b>	<b>29</b>
bias	3
11-05-10 Mom-C filed affidavit, parentage by Dad, affidavit of non paternity by Mom-C's husband	1
11-06-02 Mom-C filed short notice, ex-parte continuance, affidavits	1
Mom-B filed emergency physical custody, ex-parte short notice, affidavit(s) - Court-B allowed	1
disregard	16
[altered] audio recording lasted approximately 2 mins 36 secs	1
[Mom-C sought] sole custody, supervised visitation between child, Dad	1
07-09-13 Mom-B filed for divorce, alleging irretrievable breakdown, cruel abusive treatment	1
11-02-25 Mom-B sent Dad email accusing Dad of hitting Leon because he could not spell	1
11-05-10 Mom-C filed Complaint for support-custody-visitation for Luke	1
11-08-04 Mom-C filed for Lola, sole custody, child support, insurance, uninsured - Court-C allowed	1
18-01-29 Mom-C filed contempt, 17-10-23, 17-12-29, 18-01-19 Dad violated judgment	1
2011-05 Mom-C filed Complaint herein	1
But it wasn't because he didn't spell right	1
Dad sent response I wanted to take them swimming Do you want to take them?	1
following hearing, consideration of all credible evidence, including 17-10-23 e-mail chain, 18-01-19 e-mail chain	1
Mom-B entered the home, found Leon in his bedroom packing his belongings	1
Mom-B took Kids-B into her custody on 11-04-28, they have remained in her custody since that date	1
Mom-C sought paternity, custody, child support, insurance, supervised visitation	1
Mom-C testified, fall of 2009 she filed Complaint for Custody-Support-Visitation	1
Mr Watson 2 sons (age 13 and 18), Mom-B testified, Kids-B good relationship with [sons]	1
fabrication	5
[Mom-B] contacted local police, asked that they meet her at the home	1
contrary to Kids-B's best interest to publicize equity case	1
Dad requested, Mom-B take custody of Kids-B	1
Kids-B told Mom-B, Dad had been whispering to them since visits began in 2011-10	1
Mom-B believed Dad to be very upset, she was not sure if she should enter the home	1
validation	5
[NH school] issue not decided on removal but on uncertainty regarding custody	1
[publicize equity case] violation of contract, may be appropriate consequences	1
07-11-13 [Mom-B] filed amended complaint for divorce removing cruel abusive treatment	1
11-04-28 Mom-B chaperone for Leon's field trip	1
Mom-B alleges Dad requested Mom-B take custody of Kids-B	1
<b>exclude to deceive</b>	<b>13</b>
disregard	4
[when] she moved in with Dad, Mom-C left her role as an executive assistant	1
GALS conducted interviews with Mom-B, Dad, Lisa, Leon, Ryan, Mr Watson (Mom-B's boyfriend)	1
Mom-C testified, Dad's constant communication with third parties about this case, private life	1
Mom-C, Luke, [Sam] moved back to the apartment	1
fabrication	9
[GALS] conducted home visit to Mom-B's residence	1
2009-08, Dad's allegations of dangerous, inappropriate behavior by Mom-C toward Kids-B	1
after dispute over religion, their child, parties ended relationship	1
complaint for domestic assault on Leon filed by Concord Police	1
Dad testified, not until Mom-C filed paternity action, he became aware of pregnancy	1
Luke working with speech pathologist to overcome his speech, cognitive delays	1
marriage soon called off, [Mom-C, Dad] arguing over baptism of Luke	1
Mom-B noted, Ms Otis terrified of him	1
Mom-B reported, Ms Otis no longer wanted to work with family after meeting Dad	1
<b>idolize to victimize</b>	<b>20</b>
disregard	5
GALS asked Lisa if she sees Dad too much, not enough, just right, Lisa smiled, Just right!	1
Mom-C does not have help with Kids-C, will require child care to work	1
Mom-C responsible for maintenance, support of Kids-C	1
Mom-C unable to support Kids-C without financial support of Dad	1
shortly after meeting, parties began romantic relationship	1
fabrication	14
[Dr Kivisto contrasted] either child made comments of competition [Mom-B firmly stated]	1
[Dr Kivisto contrasted] either child made jokes of another [Mom-B firmly stated]	1
[e-mail exchanges, Dad] makes derogatory, distasteful remarks [Mom-C]	1
[Mom-B] received \$100,000 annual salary in her position twelve years ago	1
14-02-13 Court-C awarded Mom-C sole physical, legal custody of Kids-C	1

# Qnarre Full Report

apart from founding, development of her software business with Dad [Mom-B has not worked]	1	in best interest of Kids-C. Dad contributes more financially to family	1
countless e-mail exchanges, Dad exposes Mom-C's personal life	1	Kids-B then took the 8 minute walk to the bus	1
Court-B finds, Mom-B keeps Dad timely informed of all important events in Kids-B's life	2	Kids-B took eight minute walk to bus	1
Court-C finds, gross imbalance in parental care, deviation in child support necessary	1	limiting time spent with Kids-C to only 2 hours per week, Dad's behavior concern to Court-C	1
during divorce Dad, Mom-B split their assets sixty/forty respectively	1	Mom-C, Dad equally bear costs uninsured [health] costs	1
Mom-B willing to accept recommendations of GALs in supplemental report	1	parties provide each other documentation, uninsured charges for Kids-B	1
Mom-C has higher educational background, substantive skills, work experience	1	parties share equally Kids-B's uninsured health expenses	2
parenting completely disproportionate, Mom-C has Kids-C for all but 2 hours per week	1	the last time [Mom-C, Dad] lived together	1
validation	1	this routine started when Kids-B were only 5 years old	1
she is 41 years old, of sound health	1	polarize	1
<b>insinuate paternal guilt</b>	<b>28</b>	TBD	1
bias	2	validation	2
2010-06 Mom-C gave birth to their second child, Lola	1	relationship persisted, summer of 2010 Mom-C pregnant	1
Mom-C, Dad dating while he was going through his divorce	1	shortly thereafter, Mom-C became pregnant with second child	1
confusion	1	<b>mother bullied financially</b>	<b>13</b>
Dad acknowledges, Court-C so finds, he is the father of Lola	1	bias	1
disregard	11	during the relationship, Dad financially supported Mom-C	1
11-05-10 Mom-C filed for child support	1	disregard	4
2008-01 or 02 Dad started dating Mom-C	1	Mom-B not employed since 2000, choosing to live off her investments, interest income	1
2008-04 Mom-C moved into Dad's home in Concord, MA	1	Mom-B received 40% of sale proceeds, Dad received 60%	1
Dad born in Romania, in 1986, he, his family left Romania for the US	1	Mom-C at home full time with Kids-C	2
Dad immigrated to the US from Romania in 1986	1	fabrication	5
Dad seeing Dr Harrison, parenting coach, weekly, also seeing Dr Goldblatt, psychiatrist, weekly	1	[Dad financial provider, paying] Mom-C's individual expenses, her car, credit cards	1
following the incident Dad, Mom-C reconciled, engaged	1	Dad paid bills, Mom-C's personal bills, her car, credit cards	1
joint custody requires willingness, ability to work together to reach results on major decisions	1	Dad was financial support for family	1
Mom-C filed for child support, supervised visitation, genetic marker test for Lola	1	Mom-B has weekly expenses \$2,162	1
Mom-C filed opposition to Dad's motion for joint custody	1	throughout relationship, Dad financial provider, paying for expenses, bills	1
this was Dad's reaction to Leon's refusal to clean up an accident in the bathroom	1	insinuate	2
fabrication	10	TBD	2
[whistle blowing email] I wouldn't have a problem moving to Florida alone	1	validation	1
changes he made in his life since, increase in individual counseling, as reasons	1	separation agreement - neither party pay child support, Dad provide health insurance Kids-B	1
Dad has 2 Kids-C from subsequent relationship with Mom-C, Luke 3 and Lola 1	1	<b>mother bullied to abandon</b>	<b>11</b>
Dad testified, stocks later depreciated significantly	1	disregard	2
Dad, Mom-C subsequently reconciled before ending relationship about 2009-09	1	Mom-B is not in any form of counseling or therapy	1
he noted, when Kids-B lived with him they did 30 mins of reading, writing, math before school	1	shortly after divorce, verbal agreement, Mom-B had [even more extended] parenting time	1
Leon decided to go in visitation room just to give Dad a Dad's Day present	1	fabrication	2
Leon reported to Mom-B, Dad had indicated that he wanted to move back to Romania with Kids-B	1	11-01-18 Mom-B sent Dad email requesting to keep Kids-B longer to set up a play date	1
Mom-B's weekly expenses significantly higher than net weekly income	1	Mom-B testified credibly that since 11-04-28 she has not left Kids-B overnight	1
parties flexible, time telephone conversations, consideration extracurricular activities	1	insinuate	1
validation	4	TBD	1
09-07-01 Luke was born	1	validation	6
11-06-04 Lola was born	1	Mom-B has one child from prior marriage, Ryan, age 21	1
party's second child, Lola, was born summer of 2011	1	parties divorced on 08-03-19	1
within first year, Mom-C pregnant by Dad on 2 separate occasions, suffering miscarriage	1	separation agreement - Dad have physical custody Kids-B, Mom-B [weekly] parenting time	1
<b>mandate paternal guilt</b>	<b>33</b>	separation agreement - parties share legal custody Kids-B	1
bias	1	separation agreement - signed by parties	1
Mom-C did respond, engage Dad, but Dad more often initiated hurtful communications	1	until 11-04-28 Kids-B resided with Dad, agreed upon parenting provided Mom-B [weekly] time	1
disregard	4	<b>mother manipulated</b>	<b>3</b>
11-05-25 Court-C allowed Mom-C's motion for child support	1	fabrication	3
Dad pay to Mom-C retroactive support \$1,954 for Lola	1	around Lukes birth, Mom-C, Luke, [Sam] moved back in with Dad, Kids-B	1
Mom-C, Dad equally bear the costs of uninsured costs over \$250	1	in addition to romantic, Mom-C, Dad some degree of working relationship	1
Shortly birth, Mom-C, Dad signed voluntary acknowledgment of parentage	1	Mom-C alleges Dad purposefully gutted the home	1
fabrication	25	<b>prove paternal unfitness</b>	<b>29</b>
[Court-C finds] she is unable to live a normal life	1	bias	1
[on trajectory to] become aware of emotions, attuned to Kids-B's inner world, emotional needs	1	additionally, Dad admits to using corporal punishment	1
12-02-16 Leon threw hackie sack at ceiling, hit light, sprinkler once, Dad failed to redirect	1	disregard	8
at that time, supervisor spoke to Dad in hallway, informed Dad about sign, visit then ended	1	[Dr Lawson] Each rule an opportunity for making you mad, you are hard to please	1
commitment to Kids-B sense of safety, predictability through therapy, coaching, visitation	1	Court-C finds, Mom-C, Dad equally share costs of child care	1
Court-B finds, Dad's decision, lack of consideration for [Kids-B's] physical, emotional well-being	1	Dad worked long hours to hone, develop his skills in the computer industry	1
Dad confirmed at trial, He hit Leon more because unfortunately he was right there	1	Kids-B happy, safe in Mom-B's custody	1
Dad stated in deposition, He hit Leon more because unfortunately he was right there	1	Kids-C have always lived with Mom-C, she has always been primary care taker	1
Dad terminated his work with Dr Goldblatt	1	Leon also said, Mom-B's food is awesome	1
Dad testified, miscarriage devastated the relationship	1	since birth, Mom-C primary caretaker for Kids-C, have always resided with Mom-C	1
Dad told Leon, he was sorry, he loved him	1	to work outside of home, Mom-C needs child care, Dad equally share in costs	1
Dad, Mom-C did not end their relationship until 2009-09	1	fabrication	16
Dad's investment in Kids-B's success at times excessive	1	[Dad sent to Mom-B] Can you give Leon a sandwich with milk for afternoon snack?	1
Dad's rigid, harsh rules, routines emotionally draining for Kids-B	1	[Dad] would like parenting time be at Mom-C's discretion	1
dinner lasted one-half hour or so, Kids-B were allowed to talk once half of their food was eaten	1	after fit, [Leon] seems to hit bottom, changes really fast, becomes good negotiator	1

# Qnarre Full Report

as he understood [pediatrician's recommendations], decrease fat intake, increase fats	1	Dad was arrested, placed in jail	1
Court-B credits Ms Laureano's testimony, finds she did advise Dad on substantial issues	1	validation	1
Dad has worked extremely long hours developing, honing his skill in the field	1	2009-02, Dad provided apartment in Concord, MA, for Mom-C, her son [Sam]	1
Dad worried that Leon, allergic to tree nuts, would eat brownies without inspecting them	1	<b>hit son to avoid arrest</b>	6
Dad would whisper to Kids-B, they would soon live with him	1	disregard	3
deferring parenting time until after report of GAL	1	Dad admitted hitting Leon with open hand on back of the head, the [previous] evening	1
email to Mom-B 13-06-03 Dad wrote it now seems obvious, co-parenting with you is impossible	1	DCF supported 51A for neglect in 2011, declined to support physical abuse allegations against Dad	1
GAL found, Mom-C able to care for Kids-C, [Sam] by herself	1	Kids-B both reported to Ofc Moore, Dad hit Leon that morning	1
he then encouraged them to eat three more bites	1	fabrication	1
Kids-B's behavior escalate, Mom-B firmly stated, time to move on, Kids-B calmed down, continued to work	1	Ofc Moore testified, ultimately no arrest was made, there were no marks on Kids-B	1
Lisa is pretty good at realizing what is at stake, Leon is learning fast too	1	validation	2
throughout relationship, Mom-C primary caretaker for Kids-C	1	Dad denied hitting Leon the morning of 11-04-28	1
when whining, crying, throwing fit, I stop listening I can see some progress at times	1	Ofc Moore reported to the residence in Concord MA on 11-04-28	1
polarize	1	<b>no custody claim</b>	1
TBD	1	validation	1
validation	3	11-06-01 Dad filed for joint custody, affidavit in support of joint custody	1
center reports, Kids-C comfortable with Dad, Dad is affectionate, plays with them	1	<b>whistle blowing</b>	15
Dad denied ever forcing Leon to eat anything he did not like	1	disregard	11
Mom-C primary care taker of [Sam] from previous relationship	1	[Dad sent Mom-B] As far as incident goes, I did smack Leon on the head And it is NOT ok	1
<b>rigid toxic masculinity</b>	10	10-04-21 Dad sent email to Sister Rose Marie regarding [secret, altered] recording	1
confusion	1	10-05-25 Dad sent Mom-B [whistle blowing] email confirming he hit Leon	1
Dad reported to GALs, his strengths as parent, he is predictable, consistent	1	11-02-26 Dad acknowledged to Mom-B, I clearly see smacking has potential to inflict lasting, deep damage	1
disregard	3	12-05-07 Dad filed objection to sanctions	1
13-01-18 Dr Lawson wrote My objection not content, list of written rules being given	1	after he tried to get up, leave, I did smack him on the head to sit back, stop his fit	1
I started a new routine They serve themselves, we are done eating in 30-45 minutes	1	I asked what happened, with Mom-C watching, I did smack my son on the head for not ignoring Sam	1
Kids-B had chores each day during the week, would be off on weekends	1	I tried to discipline my boy for sake of our family in front of Mom-C	1
fabrication	6	I wouldn't have a problem moving to Florida alone	1
[Ms Henry, never acceptable to hit a woman, child] Dad replied But they didn't do what I asked	1	Leon got smacked for backtalking And he said afterwards didn't hurt While backtalking	1
09-10-15 Mom-B sent email to Dad discussing Kids-B's fear surrounding Dad's rules	1	Please ask her for that special recording	1
Court-B finds Dad has very strict parenting style, made up of rigid rules, routines, not age appropriate	1	fabrication	2
Dad also had structured eating times for Kids-B	1	[Mom-C]'s proof that once she truly pushes me to extremes, I do break	1
if they want to talk about rules with normal voice I listen, happily negotiate	1	I noticed that Mom-C was again recording us	1
Leon said, he ignored Dad's question, adding, it was first time I'd ever ignored him, felt good	1	validation	2
<b>(blank)</b>	2	12-05-04 Mom-B filed for sanctions	1
proof	2	12-07-23 Dad filed to add additional trial date	1
07-11-13 [Mom-B] filed amended complaint for divorce removing cruel abusive treatment	1	<b>right to work</b>	24
08-03-19 Judgment of Divorce Nisi issued	1	<b>corporate safeguarding</b>	4
<b>reductio ad absurdum</b>	47	disregard	3
<b>complete transparency</b>	19	Dad has Fidelity [SEP-]IRA \$41,919	1
disregard	6	Dad running, self-funding his startup, salary figure completely at his discretion	1
[whistle blowing email] I have been too involved in feeding	1	Dad used his personal assets to fund Quantapix	1
12-12-07 Dad filed [for] reappointment of GAL	1	validation	1
after recording last paragraph into the iPad, Kids-B proceeded upstairs to write the paragraph	1	Dad testified, reflected on FS, he is paid \$70,000 per year, \$1,346 per week by Quantapix	1
in the afternoons, after school Kids-B used their iPad to each read one page out loud	1	<b>court sanctioned fear uncertainty doubt</b>	1
Mom-B arrived at the residence, she found Lisa at the front door, crying	1	fabrication	1
only tension point is eating, Lisa eats too much too fast, Leon eats too little too slow	1	Dad's business, Quantapix, currently does not provide him with income	1
fabrication	3	<b>forbidding malicious allegations</b>	10
[Dad sent Mom-B] that was the time when I told him that if he throws a fit I will do the same	1	bias	2
[Dad sent response] you can give them dinner afterwards, I will pick them up at 7	1	Dad testified, he does not have any partners in Quantapix, company has yet to make any sales	1
Dad gave Kids-B list of rules to comply with while at visitation center	1	he testified, he has not looked for outside employment	1
validation	10	disregard	3
[GAL investigate] e-mail exchanges between Mom-C, Dad, Mom-B	1	Dad owns Quantapix which he values \$250,118	1
11-05-13 Dad filed answer to complaint, extend scope of GAL, motion for "transparency"	1	Dad testified, researched comparable salaries to determine salary	1
11-05-16 Dad filed to extend scope of GAL, include relationship Dad, Mom-B	1	failure by Dad to follow order could result in his claims being dismissed	1
11-11-18 GAL filed his report	1	fabrication	1
Court-C allowed Dad's extend scope of GAL	1	Dad able to support himself, provide support for Kids-B	1
Dad admitted at trial, he sent the correspondence	1	validation	4
Dad sent Mom-B [whistle blowing] response	1	[Dad researched] appropriate salary, with his educational, employment background	1
FS 13-08-19 Dad's reported assets \$908,117	1	2011-06 Dad began running his second start-up business	1
no evidence provided to suggest, Dad has income streams, assets other than listed on FS	1	in 2011, using his own money, Dad founded software company Quantapix	1
since start of litigation, parties attended parenting class	1	Mom-B requires contribution from Dad to support Kids-B	1
<b>false police arrest</b>	6	<b>proactive steps</b>	3
disregard	1	disregard	1
police involved after Mom-C reported to police that Dad had attempted to strangle her	1	Dad has weekly expenses of \$1,091	1
fabrication	4	validation	2
countless domestic disputes during party's relationship	1	Dad did not report any debts, liabilities, attorney fees paid	1
Dad appeared to be leaving the premises via his car at a high rate of speed	1	Dad software engineer for Quantapix, company he founded	1
Dad was arrested, Dad adamantly denies strangling Mom-C	1	<b>proven track record</b>	4

# Qnarre Full Report

bias	1	copies of GAL reports not provided to counsel in other cases without order	1
Court-C finds credible, he regularly worked 75 hours per week	1	correspondences from 2013-03-13 and 14 were not entered into evidence	1
validation	3	Court-B concerned with Dad's decision to terminate supervised visitations	1
[Dad's work] continues over 40 hours per week developing software	1	Court-B considered Dad's abuse of Leon	1
Dad received \$160,000 per year performing consulting work for Fidelity	1	Court-B deferred, nature of sanction if any to be determined at trial	1
Dad worked while attending college, earning scholarship to pay for his degree	1	Court-B did not hear any evidence at trial - Mom-B's Motion denied	1
<b>significant investments</b>	<b>2</b>	Court-B finds, modification of legal, physical custody in Kids-B's best interests	1
fabrication	1	Court-B further ordered, copies of GAL report, excerpts not provided to third parties, court pleadings	1
in addition to yearly income, Dad has almost \$1M in assets	1	Court-C allowed to restrict copying, dissemination of Mom-C's discovery	1
validation	1	Court-C does not credit Dad's testimony, he did not believe correspondence violated Court-C's order	1
Dad has invested at least \$600,000 in the development of the software company	1	Court-C does not find Dad's testimony regarding his finances wholly credible	1
<b>ulterior motive</b>	<b>190</b>	Dad again reiterated his belief, co-parenting with Mom-B is impossible in email 13-10-29	1
<b>activism through children</b>	<b>13</b>	Dad cited comprehensive report of Dr Somers, GAL in this matter	1
disregard	3	Dad is prohibited from disseminating, quoting from report of GAL	1
[GALs recommendations] family engage professional to coordinate professionals involved	1	Dad's prior assertion of privilege, Mom-B's inability to conduct discovery	1
Dad withdrew consent to therapy for Kids-B on 13-03-29	1	despite Dad's acknowledgment, hitting has to stop, Dad did not stop hitting Leon	1
Mom-B, Kids-B sat at table, Dr Kivisto told them, had one-half hour to design, draw building together	1	despite GALs' recommendations, Dad no longer seeing parenting coach, Dr Harrison	1
fabrication	4	Dr Deutsch testified credibly, Dad admitted to spanking Kids-B	1
[Dad] on trajectory to parenting, aware of emotions, attuned to Kids-B's inner, emotional needs	1	following investigation, allegations of abuse, DCF removed Kids-B from his care, custody	1
[Dr Lawson] Leon seems afraid of you, regard you hard taskmaster with rules	1	following sale of software, his subsequent divorce, Dad still left with significant income, assets	1
Court-B now looks to Kids-B's best interests	1	good relationship with Kids-C during parenting, [Dad's] actions outside of those are concerning	1
Leon attends therapy with Dr Lawson	1	having found material change in Dad's parenting ability	1
perpetuate	1	in event terminated, [GAL] report returned to counsel, not to patient, subsequent therapist	1
TBD	1	inevitable Dad will need be able to redirect Kids-B in parenting	1
poliarize	1	Kids-B were removed from his custody under findings of neglect	1
TBD	1	mental health professional signs agreeing not copy, disseminate	1
validation	4	parties agreed Mom-B not pay Dad child support, despite Dad primary physical custodian of Kids-B	1
child's best interests served by ending joint arrangement than by coercive proceedings	1	requesting Mom-B pick up Kids-B, take them to her home	1
Dr Kivisto, possible Dad uncomfortable being firm for understandable reasons, being observed	1	subpoenaed party [Dr. Goldblatt] not on witness lists required by trial order	1
Kids-C of this matter are Luke 09-07-01, Lola 11-06-04	1	the best interest of Kids-C, any information not disseminated outside this court case	1
Mom-C, Dad never married, but had Kids-C of the relationship	1	therefore, Court-C does find Dad in contempt	1
<b>activist empowerment</b>	<b>7</b>	recast	3
confusion	2	TBD	3
Dr Harrison may consult with Mom-B	1	validation	10
one potential supervisor Ms Brice	1	[house] Concord, MA with no mortgage, fair market value \$1,425,500	1
disregard	2	[reports] Dad attentive to [Kids-C's] needs	1
13-02-12 Court-C ordered Alternative House release records [of] visits between Dad, Kids-C	1	11-12-16 Dad sold his home at Concord, MA for \$1,520,000, no mortgage	1
Drs Harrison, Lawson, Gallagher monitor Kids-B's adjustments to changes closely	1	12-08-08 Mom-B filed to exclude evidence regarding PTSD	2
fabrication	2	allegations of abuse have not extended to Kids-C	1
Ms Brice at FairPlay the visitation supervisor	1	assessment of credibility is quintessentially domain of trial judge, judge's assessment is close to immune from reversal on appe	1
Ms Brice is unavailable, parties seek recommendation from Ms Brice	1	Dad admitted, during deposition and trial, he hit Leon on 2 occasions	1
validation	1	Law Offices of Foley, escrow \$195	1
Dr Lawson referred Leon to Dr Tempesta for psychological evaluation	1	reports from supervised visitation center, Dad has caring relationship with Kids-C	1
<b>conceal ongoing fraud</b>	<b>65</b>	<b>delay for advantage</b>	<b>4</b>
bias	2	disregard	2
ex-wife has physical custody of Kids-B	1	13-04-29 Mom-C filed to consolidate contempt with paternity complaints for trial	1
their son, Luke was born on 09-07-01	1	Court-C allowed motion to consolidate	1
disregard	15	fabrication	1
[Mom-B] reported mood-based problems of nervousness, worry, being argumentative, oppositional	1	Court-C ordered - parenting time be addressed at trial	1
[Mom-C] alleged Dad distributed court orders, pleadings, documents, FS	1	validation	1
12-05-04 Mom-B filed Motion for sanctions, Dad filed objection - Court-B deferred	1	unfortunately GAL investigation incomplete as of date this motion argued	1
best interest of Kids-C, information not be disseminated outside of this court case	1	<b>distort to confuse</b>	<b>41</b>
Dad's buy-out of Mom-B's interest was based on one-half of purchase price	1	bias	1
Dad's relationship with Kids-C, willingness to spend only limited time with them	1	in 2008-04, Mom-C, her son Sam moved in with Dad, his Kids-B	1
during marriage, parties updated the kitchen, purchased new furnishings	1	confusion	1
Mom-C requested, Court-C prohibit Dad from disseminating relating to the case	1	Mom-B filed to allow Mom-B's expert to testify - Court-B allowing expert to testify	1
Mom-C testified, she, Dad had [professional] working relationship	1	disregard	14
Ms Aponte testified, despite available time, Dad elected, only 2 hours per week of parenting time	1	[Dr Kivisto] observed Kids-B with Mom-B on 12-07-12	1
presumptive child support guideline \$261 per week	1	[whistle blowing email] Dad admitted hitting Leon another occasion for fighting with Mom-C's Sam	1
ring (from prior engagement to Dad) valued \$4,500	1	51A has been filed by DCF against Dad with regard to Kids-B	1
ring with value \$4,500	1	after recording the paragraph, Kids-B proceeded upstairs to write paragraph	1
she testified, 2010-01 parties attempted to reconcile, complaint was dropped	1	attributing income, imputing salary, yields presumptive child support \$261 per week	1
visitation coordinator testified, Dad offered additional times, chose to have only 2 hours per week	1	citing his belief, he, Mom-B should wait until after trial to sign Kids-B up for skiing lessons	1
fabrication	35	Court-B finds, regardless of whether Dad hit Leon during audio recording	1
[Dad] hit Leon on 2 occasions in 2011 on 10-05-25 and on 11-04-27	1	Dad reported to GALs, he provides structure, routine for Kids-B	1
[Dad] seeking to submit additional evidence pertaining to his individual therapy - 13-12-05 Court-B denied	1	he reported, each time Kids-B in an activity, had to have structured activity before allowed play	1
[Dr Lawson] to be perceived differently, written rules, no matter how benign, bad tactic	1	Kids-B used their iPad to read out loud, recording the paragraph	1
after field trip, Mom-B received text message from Dad stating he was sick of Leon's hissy fits	1	Mom-C moved Dad to have supervised visitation after relationship with Luke diminished	1



# Qnarre Full Report

Mom-C testified, in the beginning, she, Dad had a good relationship	1	Dad, Mom-C engaged in verbal argument about oversight, he placed his hands on her shoulders	1
Ms Laureano's office is computer in hallway immediately across doorway of visitation room	1	despite GALs' recommendation, therapy with Dr Lawson, Dad withdrew consent to therapy 13-03-29	1
relationship began as dance partners, evolved into a romantic relationship	1	GALs have concerns not only regarding Kids-B's physical safety but emotional safety as well	1
fabrication	20	Leon continues to experience anxiety surrounding visitation	1
[Dad] to submit additional evidence pertaining to his individual therapy - 13-12-05 Court-B denied	1	Leon need to experience Dad as firm, without unpredictable anger, volatility Leon anticipates from him	1
after spanking conflict is solved, he kisses, hugs Kids-B, tells them everything is good	1	Mom-B understands Mom-C better, describes their relationship as cordial	1
Dad acknowledged hitting Leon sometimes because unfortunately he was right there	1	Mom-C relied on food, assistance programs, Dad continues large assets, ability to financial support	1
Dad admitted to hitting Leon twice in 2011, on 10-05-25 and on 11-04-27	1	recast	1
Dad began to develop new software by the name of Quantapix	1	TBD	1
Dad expressed great concern, Kids-B have not continued these exercises since 11-04-28	1	validation	4
Dad, with help of Mom-B, eventually able to develop, sell his own software	1	Dad subsequently sold the property	1
different circumstances surrounding Dr Deutsch's report	1	during [altered] recording, Dad is heard yelling	1
emailing Mom-C, copying 20-90 people, Kids-C's pediatrician, teachers information about Kids-C, this case	1	Ms Laureano testified credibly, she never observed Dad whispering to Kids-B	1
Fidelity retirement [brokerage instead] account \$129,540	1	parties purchased property for \$3,000,000, paid \$110,000 for kitchen renovation	1
he spans Lisa less often, she reportedly listens well, receptive to his feedback	1	<b>erase initial fraud</b>	<b>18</b>
if Kids-B went swimming, had to first swim ten laps before they could have free time	1	disregard	6
Kids-B required to do reading, writing, math assignments in addition to regular school work	1	11-08-08 Mom-B filed expand GAL investigation to include removal - Court-B allowed	1
Leon noted, at Mom-B's he gets to play, at Dad's only got to play if he ran around house 20 times first	1	after consideration of evidence, all reasonable inferences	3
Mom-B has Bachelor's in BA from Northeastern University	1	following hearing, consideration of all credible, clear, convincing evidence	1
Ms Laureano testified, only advised regarding activities, games, food, never regarding safety	1	the last five years, Dad has used e-mail to relentlessly pester, disturb Mom-C	1
prior to founding software company with Mom-B [Dad consulting work for Fidelity]	1	fabrication	10
the cause of [Leon's] discomfort was not apparent at that time	1	[Leon] stopped seeing Ms Otis, Mom-B did not think she was effective	1
they ran ten laps around house, had breakfast, went upstairs to complete fifteen minutes of math exercises	1	Court-B temporary order - parties comply with stipulation	1
within first six months, Mom-C, [Sam] from previous relationship moved with Dad, Kids-B	1	Dad not take copies, not disseminate information by Mom-C to third parties, any of providers	1
validation	5	Dad ordered not to disseminate Mom-B's FS, any information therefrom	1
09-10-16 Dad email to Mom-B Yeah, rules What I'm trying to encourage them to speak up	1	Dad's prior assertion of privilege, Mom-B's inability to conduct discovery	1
Mom-B testified credibly, Leon withdrawn during trip, standing by himself, not typical	1	Mom-B filed renewed to allow enroll Kids-B in NH school - Court-B allowed	1
parties divorced on 08-03-19	1	Mom-B has no intention of sending Kids-B to boarding school	1
session designed to observe Mom-B's interactions with Kids-B in structured setting	1	noting Mom-B resided outside of MA before case began	1
used furniture/rugs/lawnmower/hand tools \$30,000	1	request for gag order, facts not sufficient to infringe on Dad's right to free speech	1
<b>divide and conquer</b>	<b>3</b>	they ran 10 laps around house, had breakfast, went upstairs, 15 mins of math exercises	1
disregard	1	validation	2
Dad, Mom-C in domestic relations litigation regarding Kids-C while this action pending	1	11-06-22 Mom-C filed for orders regarding dissemination	1
fabrication	2	Mom-C filed regarding dissemination [for] Lola	1
Dad reported to GALs, his relationship with Mom-C tumultuous	1	<b>(blank)</b>	<b>65</b>
Mom-B believes, Dad's relationship with Mom-C presents danger to Kids-B, not Mom-C	1	<b>(blank)</b>	<b>65</b>
<b>double down on fraud</b>	<b>39</b>	claim	65
bias	1	[Dad forwarded] to Mom-C, 27 people, school, Police, who were never involved in the case whatsoever	1
evidence excluded if probative value substantially outweighed by danger of unfair prejudice	1	[disobedience] to clear, unequivocal order in all actions, not merely by preponderance of evidence	1
confusion	1	[guilty by publishing, disseminating] including court documents	1
Court-B also credits Mom-B's testimony regarding Kids-B's report to her	1	[guilty] by publishing, disseminating information pertaining to this case, to third parties	1
disregard	11	[Mom-C alleges] emails containing negative statements about Mom-C	1
[Mom-C cited] Dad's encounter with Police, DCF, allegations of physical abuse against Kids-B	1	17-07-18 chain continued, 18-08-17 Dad wrote A year I completely lost all connection with Kids-B, Kids-C	1
12-03-05 Court-B temporary order stipulation 12-02-13	1	17-07-18 chain ends, 17-10-23 Dad wrote To safeguard, I will be filing restraining orders to protect Kids-B, Kids-C	1
12-04-11 Mom-C filed to restrict copying, dissemination of discovery by Dad	1	17-07-18 email had 2 letters attached, one to Court-B, other to Police, DCF, DA, FBI	1
additionally, GALs conducted telephone interviews with Dr Harrison, Ms Gaffny	1	17-07-18, Dad wrote I intend to publish all documents, emails, text messages, reports, etc in my possession all those document:	1
citing safety concerns due to Dad's irrational behavior	1	18-01-12 Dad wrote This attached to motion for permission to publish	1
Dr Kivisto found, Dad's most notable limitation, difficulty redirecting Kids-B	1	18-01-19 Dad emailed ~20 individuals, Please see attached letter, notices, motions, emails	1
Dr Kivisto testified, not only concerns for Kids-B's physical, but emotional safety as well	1	18-05-16 probation report Dad admitted to disseminating information	1
GALs made recommendations after supplemental investigation	1	aim is to coerce performance of required act by disobedient party for benefit of aggrieved complainant	1
Mom-B again raised her concern regarding ADD with Leon's pediatrician	1	attachments included motions for relief, to end hostage crisis, permission to publish	1
Mom-B alleged, Dad disseminated information from GAL report to third parties	1	continued to disseminate information regarding this case to third parties	1
parenting time continue at Alternative House	1	Court-C finds Mom-C's assertions credible	1
fabrication	21	Court-C finds, by clear, convincing evidence, admissions, Dad clearly disobeyed this Court's judgment	1
[Court-B finds,] unquestionable from cries, pleas, Dad placed Leon in fear of imminent bodily injury	1	Court-C finds, sending of e-mail violates judgment, includes references to Kids-C, medical status, trial testimony	1
[Dad] inability to control anger, resulted in lashing out at Kids-B, Leon	1	Court-C's judgment, dated 14-02-13 is clear, unequivocal	1
[Dr Deutsch to] update her report	1	Dad acknowledged to disseminating court documents, information	1
12-05-24 Mom-B to re-appoint Dr Deutsch to investigate - Court-B allowed, post-doc testify at trial	1	Dad admitted to disseminating court information to probation officer of this Court	1
13-09-20 Dad refused to pay for one-half of Kids-B's skiing expenses	1	Dad also wrote, "Yet, [identified third party], a 400 times GAL Harvard psychologist (at the time) with no training or license to p	1
additionally, the furnishings cost over \$200,000	1	Dad closed the email by writing, "PS Just as I previously promised, in order to protect my Kids-B and Kids-C and their mothers fr	1
after visit on 13-11-06 Dad unilaterally canceled future visits citing frustration with canceled visits	1	Dad copied 22 people to this email	1
Court-B considered, credited recommendations of GALs	1	Dad has even attached his motions, ex parte letter sent to Court to these emails	1
Court-B does not credit Dad's testimony, he cannot afford counseling given reported income, assets	1	Dad is guilty of contempt for continuously violating the judgment	1
Court-B finds, Dad caused bodily injury to Leon by hitting him on back of the head on 4 occasions	1	Dad offers to provide court documentation to support his allegations	1
Dad admitted twice in emails to Mom-B, impossible for him to co-parent with her	1	Dad repeatedly emailed Mom-C about issues relating to court proceedings	1
Dad decisions do not take into account Kids-B's physical, emotional, learning, medical needs	1	Dad seeks to investigate alleged criminal activity that took place in Court	1
Dad guilty of contempt for willfully, knowingly disseminating information pertaining to case	1	Dad was ordered to refrain from doing so	1
Dad has demonstrated poor decision-making in regards to Kids-B's education, medical care	1	Dad wrote Mom-C scared my daughter with a knife She meant no harm, as she later testified	1

# Qnarre Full Report

Dad wrote, "After all, he seems to be in the [third party identified] sinister 'feeder network', openly preying on and victimizing li	1
e-mail included specifically identifying third party certificates or service	1
email copied to ~57 people	1
email sent to ~76 people	1
email sent to Mom-C, third party, copied to ~31 people	1
email was copied to 14 people	1
email was copied to 20 people	1
email was copied, with attachments, to ~27 people	1
emails discuss custody, child support, legal expenses, allegations against Mom-C, GAL, other professionals	1
emails have been copied to 90+ people, most of which have never been involved in this case	1
full control of completely alienated from their father	1
herein attached letters to court, DA's offices, DCF, police, FBI will be motivating factors	1
I will soon send to the police for routine wellness check	1
In Dad's Motion for Permission to Publish, filed 18-01-19 Dad acknowledges to disseminating case information and writes, "Furt	1
information has been shared with DCF, attorneys, government officials among others	1
information references medical treatment of Kids-B, references to depositions, all of which this Court finds violates Judgment	1
It all came to a head when [identified third party], the appointed GAL in the Mom-C case, flat out lied to the judge regarding me	1
judgment found, in best interest of Kids-C for Dad not to disseminate any information to third parties	1
letters described the court case with Mom-C, reference aspects of the cases	1
Mom-C alleges Dad violated provision on multiple occasions, specifically on 17-10-23, 17-12-29, 18-01-19	1
Mom-C alleges, 18-01-13 Dad filed, forwarded his motion to end hostage crisis	1
On 17-11-09 Dad emailed a third party and wrote, "Yes, you absolutely had something on Henry, just as Otis letter documented	1
On 17-11-11 Dad emailed another third party and wrote, "FYI, please note that the attached will be published on the internet so	1
payment of all legal expenses	1
please try to keep teachers, schools informed	1
purpose of civil contempt is remedial	1
recipients include university professors, law enforcement officers, FBI, Kids-C's providers	1
to be found in contempt, must be supported by clear, convincing evidence of disobedience	1
to find civil contempt, must be clear, unequivocal command, equally clear, undoubted disobedience	1
where the order is ambiguous, disobedience doubtful, there cannot be finding of contempt	1
while e-mail references intention to publish	1
while references further dissemination, the court finds, e-mail itself violates court order	1
while references future activity, Court-C finds, sending of specific e-mail violates the court order	1
while they had full voluntary, multiple subpoenaed disclosures of my finances, they still promised her impossible \$10K/month c	1
<b>Grand Total</b>	<b>1277</b>

**COMMONWEALTH OF MASSACHUSETTS**  
**SUPREME JUDICIAL COURT**

SUFFOLK, ss

Appeals Court Nos.<sup>1</sup> 2021-P-[REDACTED]  
2021-P-[REDACTED]  
2021-P-[REDACTED]

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Imre Kifor, Appellant

v.

[REDACTED], Appellees

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On Appeal From Middlesex Superior Court

DOCKET No. [REDACTED]

On Appeal From Single Justice Appeals Court

Prior DOCKET No. 2021-P-[REDACTED]

On Appeal From Middlesex Probate And Family Court

DOCKET Nos. [REDACTED]

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**Imre Kifor's Application for Direct Appellate Review**

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10/5/2021 and 10/13/2021

Imre Kifor, Pro Se

[REDACTED]  
Acton, MA, 01720

I have no phone

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

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<sup>1</sup> Please see the attached "Affidavit On The Necessity For Filing Simultaneous And Identical Applications For DAR."

v. Sahin. As Father's earnest, documented efforts to have the judgments reconsidered, stayed, or appealed have been silently banned, he could not have filed for relief any sooner, Sahin v. Sahin, Parrell v. Keenan.

"The Scheme" started on 5/2 and 10/2011, when Mothers filed their deliberately false statements in Family Court. Their later blatant deceptions and obstruction has continued to this day. Father's denied ability to secure an income, support his children and have any meaningful relationship with them, and to simply continue to exist without being thrown in jail for wanting to equally provide for all of his children will not just disappear. "Rule 60 (b) (6) vests 'power in courts adequate to enable them to vacate judgments whenever such action is appropriate to accomplish justice,'" Parrell v. Keenan, must be then applicable.

One expects similarity in outcomes from a court's clear observations of "parallel custody investigations regarding two sets of children with the same father progressing at the same time without any official acknowledgment." But a textual analysis of the two 2/13/2014 and 6/30/2014 "finding of facts," or loosely

"storybooks", yields 1,200+ discrepancies, A:393.

Family Court's punitive actions to bury Father's

analysis of the seemingly routine child-predatory GAL

investigations in our family courts is extraordinary,

satisfying Zurich North America v. Matrix Serv., Inc.

Family Court silencing complaints of a) forced, out-of-state brainwashing and medicating of children, who had suffered from diagnosed PTSD and repeated uprooting, b) painful, unnecessary (cancer) surgery of a child, paid with fraudulent health insurance funds, c) endless, child-torturing supervised visits with a single "waterboarding" agenda, and d) deliberate child abuse, i.e. "fathers are toxic" type of parental alienation, even by public schools, show "a complete absence of reasonable basis," Yapp v. Excel Corp.

#### **WHY DIRECT APPELLATE REVIEW IS APPROPRIATE**

Direct appellate review is appropriate where an appeal presents (1) questions of first impression or novel questions of law, (2) state or federal constitutional questions, or (3) questions of substantial public interest, Mass. R. App. P. 11(a). These consolidated appeals present all three above types of questions.

COMMONWEALTH OF MASSACHUSETTS  
SUPREME JUDICIAL COURT

SUFFOLK, ss

No.

Appeals Court Nos. 2021-P-[REDACTED]  
2021-P-[REDACTED]

---

IMRE KIFOR,  
Appellant,

v.

[REDACTED]  
[REDACTED],  
Appellees

---

**Imre Kifor's (Paired) Application for Further  
Appellate Review**

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Date: 7/13/2022

Imre Kifor, Pro Se

[REDACTED]  
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>

52. The agenda to cover up any consequential forced indignities lead the Family Court to ignore Father's 11 timely filed notices of appeals, only to then falsely insinuate Father's "inaction" while the time ran out.

53. The above scheme of actively falsifying the Family Court docket, by first denying any adverse evidences of systemic misconduct & then deliberately precluding any appeal reviews of such denials, will continue to successfully defraud all the other courts as well.

54. Concrete evidence is the herein appeal of even the Supreme Judicial Court's therefore deceived assumption that "the petitioner has an adequate, alternate remedy in the normal appellate process" directly contradicted by plain impossibility of reviewing the "inexistent."

55. Herein documented "activist feminist" profiteering schemes, as child-predatory "high-conflicts" can be fabricated by officers of the Family Court on demand, can easily continue *ad infinitum*, at least in theory.

56. Father's forced and thus intractable indigency is exploited *ad infinitum* in Family Court through endless contempt actions derived from ambiguous court orders.

57. Only such orders can conceal the allowed activist fraud and stereotypical discriminations at the core of the matters. Specifically, Father has now documented 1,200+ contradictions and inconsistencies between the original judgments' reporting on identical "facts."

58. Family Court then purposely delayed these contempt actions, while also sabotaging their intended appeals, to apparently interfere with the appeals processes.

59. As attached, Father has properly responded to the complaints for contempts, ultimately scheduled to be heard in parallel in Family Court on 12/3 and 6/2021.

60. While Father claims and proves that he cannot be guilty of contempt because of a) his innate inability to comply/pay, and b) the Family Court's deliberately ambiguous orders, he was fearful of being once again punitively silenced and unjustly sentenced to jail by Family Court, just as it had happened on 10/21/2019.

61. In reality, however, forced indigency is the end, as it can be concealed only temporarily. When the courts start to take forced indigency seriously, all prior recklessly introduced inconsistencies can only be solved by a review of all the originating causes.



62. Father does not have the option of "walking away" from this existential crisis forcefully brought on him and most fundamentally affecting his life & existence.

63. After receiving the Appeals Court's opinion, Father renewed his complaints for modifications in Family Court (the 4th cycle around of the same facts), as his only apparent defenses from the still active and unappealable fabricated complaints of contempts.

#### **CONCLUSION**

64. Now filed evidence, including verifiable emails, point to a significant degree of malicious collusion (or outright conspiracy by Family Court and mothers) to silence and enslave Father "under color of law."

65. Given the now endlessly accumulating proofs of Father's forced indigency, a court can either delay a decision or finally consider the existence of fraud.

66. If fraud is considered then now filed evidence clearly points to its systemic nature, or chain-fraud.

67. Solving chain-fraud is only possible by tracing it back to its origin. Father argues that only Rule 60 (b) (6) or "fraud on the court" can apply in this case.