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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION**

IN RE THE FORMER MARRIAGE OF:)
)
PETER MATT,)
)
 Petitioner,)
)
 and)
)
MEGAN MATT,)
 n/k/a MEGAN MASON,)
)
 Respondent.)

Case No. 2016 D 009534

PETITION TO SUBSTITUTE JUDGE FOR CAUSE

On December 6, 2021 I intend to present this petition at Zoom Court before Judge Robert Johnson at 10 am via (Zoom ID: 934 9022 2003; Password 543296). As will be detailed herein, I am fearful that this pleading will go unheard and I am fearful of retaliation, and submit this as a potential whistleblower, given the volume of irregular events that have transpired. I am therefore also requesting that The Honorable Grace Dickerson ensure that I am granted a hearing by an objective judge not related to this case.

Summary

I pray that The Honorable Judge Robert Johnson be substituted for cause on the basis of judicial bias against me, Megan Matt (NKA Mason), Respondent, acting pro se in this case.

*Section 5/2-1001 of the Code of Civil Procedure governs substitution of judges. 735 ILCS § 5/2-1001. **Motions for substitution of a judge may be made for involvement in the action, cause, as a matter of right, or in contempt proceedings. Id. § 5/2-1001(a). A party may move for substitution for cause at any time by filing a petition that asserts the specific allegations that justify substitution. Id. § 5/2-1001(a)(3).***

Each party is entitled to move for substitution as a matter of cause. 735 ILCS § 5/2-1001(a)(3)(i). To move for substitution as a matter of cause, a party must file a petition setting forth the cause for substitution and praying for a substitution of judge. Id. § 5/2-1001(a)(3)(ii). The petition must be verified by the affidavit of the moving party. Id. § 5/2-1001(a)(3)(ii). A judge who is not named in the petition will conduct a hearing to determine whether cause for substitution exists. Id. § 5/2- 1001(a)(3)(iii).

In support thereof, I state as follows:

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1. Judge Robert Johnson's demonstrated bias against me is grounds for substitution for cause.
2. Judge Johnson's bias has been witnessed and documented extensively.
3. Specifically: Judge Johnson's bias against me has been demonstrated by: repeated ex parte communications; repeated denial of due process; and a contempt finding against me not based in fact.

Overview

4. On September 27, 2017, the parties were divorced and the Court entered an Allocation Judgment.
5. Two children were born of the marriage, namely An [REDACTED] 08 and currently age 13; and, Ti [REDACTED] and currently age 9.
6. On February 19, 2019, Mr. Matt, petitioner, moved that a guardian ad litem be appointed.
7. I, Megan Mason, Respondent, opposed this appointment.
8. On June 6, 2019, Judge Johnson selected and ordered the appointment of Michael Bender as Guardian Ad Litem, two years post decree with no underlying legal proceeding pending.
9. Subsequently Mr. Bender has requested and was granted by Judge Johnson the appointment of Dr. John Palen as Parenting Coordinator on September 25, 2020..

Ex Parte Communications

10. *Ill. Sup. Ct. R. 63,(5) A judge shall not initiate, permit, or consider ex parte communications, or consider other communications made to the judge outside the presence of the parties concerning a pending or impending proceeding except that:*
 - (a) *Where circumstances require, ex parte communications for scheduling, administrative purposes or emergencies that do not deal with substantive matters or issues on the merits are authorized; provided:*
 - (i) *the judge reasonably believes that no party will gain a procedural or tactical advantage as a result of the ex parte communication, and*
 - (ii) *the judge makes provision promptly to notify all other parties of the substance of the ex parte communication and allows an opportunity to respond*
11. Judge Johnson has allowed and indirectly participated in inappropriate ex parte communication via emails with opposing counsel to and from his clerk, Ms. Kaye Mason, on at least two occasions.

12. On December 5, 2020, Dr. John Palen, parenting coordinator, accidentally copied me on an email including Mr. Bender; Mr. Christopher Wehrman, opposing counsel; and Ms. Kaye Mason, Judge Johnson's clerk.
- a. This email was one of a seeming thread of emails discussing this case. It appears there are other emails between these parties because Dr. Palen uses no address (eg "Hi John"), but rather writes a statement as if in response to prior discussion.
 - b. I was excluded and no attorney representing me has been included in this or other email threads between these individuals and Ms. Kaye Mason.
 - a. I happened to receive this one email unintentionally when Dr. Palen accidentally copied me because I share Ms. Kaye Mason's last name.
 - b. This email is evidence of inappropriate ex parte communication wherein all parties in this case, except me, are given access to communicate with each other and with Judge Johnson via his clerk, on an ongoing, secretive basis.
 - c. This private email thread almost certainly gives the opposing parties in this matter a tactical advantage. This is on the face of it evidence of profound bias and prejudice toward me.
 - d. The contents of this particular email are particularly troubling. In this email, Dr. Palen wrote, "**I want to be paid. It is as simple as that**".(Exhibit A "I want to be paid" email)
 - e. At this time Dr. Palen had been paid in full and was still being compensated by funds drawn from his positive retainer balance. No fee motions were pending or even contemplated.
 - f. It's implausible to regard this email as part of a routine scheduling matter.
 - g. Further, Dr. Palen lied about the nature of this email, suggesting guilt. Specifically, Dr. Palen, upon realizing he had accidentally copied me, wrote, "Sorry- this was meant for another case. I had not noticed Ms. (Megan) Mason on the list of recipients." (Exhibit B "Sorry this was meant for another case" email)
 - h. No reasonable person would believe this was meant for another case or that Mr. Wehrman, Mr. Bender and Judge Johnson happen to be involved in another case with Dr. Palen, as evidenced by the fact that no counterparty attorney was copied.

- i. If by some stretch of the imagination this could be considered appropriate ex parte communication, there would necessarily be an attorney for both the Petitioner and the Respondent copied. There was not, except by accident.
- j. The discussion of personal remuneration in an ex parte communication, not intended to be read by one party, is deeply troubling. Any reasonable person would have to question the credibility of court proceedings after becoming aware of such behaviors.
- k. No party has ever informed me of the other emails in the chain, much less acted promptly to notify me of the substance of the ex parte communication
- l. By allowing such practices in his court, Judge Johnson has created an atmosphere that is inherently untrustworthy and imbalanced unfairly against me.

13. The second instance of ex parte communication observed by me occurred on May 27, 2021 when, having duly followed procedures and guidelines for Cook County Domestic Relations Division under Covid protocols, I scheduled a hearing on three petitions. (**Exhibit T** *PETITION FOR RULE TO SHOW CAUSE AND MOTION TO COMPEL RE: STRANGE ADULTS IN CHILDREN'S HOME*; **Exhibit U**: *PETITION FOR RULE TO SHOW CAUSE AND MOTION TO COMPEL RE: FAILURE TO PROVIDE CHILDCARE FOR CHILDREN AND FAILURE TO ADDRESS CHILDREN'S SAFETY*; and **Exhibit V**: *PETITION FOR RULE TO SHOW CAUSE AND MOTION TO COMPEL RE: HARASSMENT AND FAILURE TO ADHERE TO PARENTING PLAN WITH REGARD TO PARENTING TIME*.)

(**Exhibit C** Please may I have a hearing date email)

- a. These pleadings all contain matters that seriously impact the well being of the children.
- b. The pleadings are supported by more than fifty pieces of documentary evidence including: a police report, an email from a police officer stating that the parenting time violations ought to be addressed by a judge, an email from the parenting coordinator stating that some matters need to be brought before the judge and multiple threatening emails from Mr. Matt to me and staff members at my church.
- c. On May 27, 2021 I emailed Ms. Kaye Mason, Judge Johnson's clerk, to schedule my hearing on the matters (**Exhibit C** Please may I have a hearing date email).
- d. As is protocol, I copied Mr. Wehrman, Petitioner's attorney, and Mr. Bender, GAL.
- e. Ms. Mason followed Cook County Domestic Relations Division protocols and scheduled my court appearance (**Exhibit D** "The first available date" email).

- f. Mr. Matt did not want these pleadings brought to court because they contain voluminous evidence of his ongoing violations of the parenting plan and other misconduct.
- g. Mr. Matt had been given the opportunity to provide a written response to the pleadings and did so.
- h. Mr. Matt, via Mr. Wehrman, responded to the pleadings and provided no evidence that the claims made therein were in any way false. Mr. Matt provided no explanation for the serious misconduct disclosed therein nor did Mr. Matt indicate he intended to stop any of the misconduct.
- i. On May 27, 2021 Mr. Wehrman requested Ms. Mason ask Judge Johnson to deny me a hearing on these matters . Mr. Wehrman emailed Ms. Mason,
"Kaye: When we were before the Judge on Monday, he appointed a 604 evaluator and set everything for status on July 13, 2021. I do not believe Judge Johnson is having any hearings on this case at this time." (Exhibit E "I do not believe Judge Johnson is having hearings" email).
- j. Ms. Mason then wrote that she would accommodate Mr. Wehrman's request by verbally communicating his wish to cancel my hearing to Judge Johnson (**Exhibit F** "I will verify with the judge" email).
- k. As a basis for his special treatment Mr. Wehrman suggests that because Judge Johnson appointed a custody evaluator no matters should be heard. This is simply unimaginable.
- l. A custody evaluation can be long and protracted and parents ought to at no time be barred from accessing due process to address urgent matters relating to their children's well being.
- m. Further, as is the case of financial allocation, not all matters related to domestic relations are addressed by a custody evaluation and there is no reason that such a process should displace normal court functioning.
- n. Ms. Mason agreed to follow Mr. Wehrman's instructions and set aside Cook County Domestic Relations Division policies in order to see if Judge Johnson would grant Mr. Wehrman his favor of blocking the hearing (**Exhibit F** "I will verify by the end of the day" email)
- o. According to an email from Ms. Mason, without any reference to a legal basis, Judge Johnson verbally approved this favor to Mr. Wehrman and ordered her to cancel my duly scheduled hearing date. (**Exhibit G** "I just spoke with the judge" email).

- p. Ms. Mason's reference to the fact that she received an email request from Mr. Wehrman and then "just spoke the judge" firmly establishes that she is in the habit of using email as a way to brazenly facilitate ex parte dealings and she must therefore in all her communications be seen as a proxy for Judge Johnson.
 - q. On the face of it these events demonstrate an unequal relationship wherein Petitioner's counsel is allowed to seek and receive favors outside of open court to my detriment.
 - r. Ms. Kaye Mason had previously rebuked me via email to, "Please do not include me (Coordinator) in correspondence between counsels and litigants" (**Exhibit H** "Please do not include me").
 - s. Because Petitioner is given the ongoing opportunity to discuss any number of matters with Judge Johnson via his clerk on an ex parte basis and I have been strictly rebuked for any communication to Ms. Kaye Mason that is not routine scheduling, which is to say legally allowable, there is an inherent imbalance.
 - t. Particular scrutiny should be given to the fact that I was at this time pro se and, Judge Johnson did not utilize the leniency afforded to judges to *Ill. Sup. Ct. R. 63, (4)* to "*make reasonable efforts, consistent with the law and court rules, to facilitate the ability of self-represented litigants to be fairly heard*".
 - u. In fact, contrary to the above statute, Judge Johnson has consistently held me to a higher standard in order to access judicial process than the standard an attorney must meet. This is simply an impossible situation for a litigant.
 - v. This imbalance is evidence of overwhelming bias against me.
18. In denying me hearing dates for various urgent matters I have attempted to bring to his attention, Judge Johnson deprived me of my legally protected right to due process.
19. My right to due process is protected by the Fifth Amendment of the Constitution of the United States of America and explicitly by *Ill. Sup. Ct. R. 63, (4)* which reads, ***A judge shall accord to every person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to law. A judge may make reasonable efforts, consistent with the law and court rules, to facilitate the ability of self-represented litigants to be fairly heard***
20. In a further attack on my constitutional right to due process, I have also been denied notice and the right to participate in hearings in my own case on multiple occasions. .

- a. In the first instance, on November 19, 2018 Mr. Matt filed a Petition for Rule to show cause against me.
- b. On December 3, 2018 I was found in contempt without having received notice. In fact I received a US postal service mailed notice the evening of Dec. 3, 2018 informing me of the hearing earlier that day at which I was found guilty by default. Curiously Mr. Matt's attorneys emailed me the ruling. (**Exhibit X** First Contempt Ruling Without Due Process).
- c. Pro se at that time I was forced to use my entire \$5,000 savings to retain counsel in order to have this overturned.
- d. On March 10, 2020, unbeknownst to me, Mr. Matt filed a Petition for Rule to Show Cause alleging that I was in contempt of court for various matters.
- e. Mr. Matt, through counsel, served this petition via email on my attorney at the time, Brad Trowbridge, on March 10, 2020, but I would not learn of this matter until over four months later.
- f. Mr. Matt is a vexatious litigant who has been in the habit of filing motions and petitions intended to harass me and inflict financial harm on me since I separated from him and our divorce proceedings began in 2016.
- g. Because he is a vexatious litigant, I had followed up with my then attorney Brad Trowbridge periodically and on April 22, 2020 specifically wrote,
*"I hope you're well and your clients are not suffering too badly from the quarantine. I'm personally **quite pleased that no motions are being filed right now, a nice break =>**".* (Exhibit I, "No motions are being filed" email).
- h. Mr. Trowbridge did not tell me at that time that there was a scheduled court appearance or that a PRTSC had been served on me and a contempt allegation made against me. In fact he affirmed that there was no litigation, writing:
"Megan. Yes, unfortunately, it took a pandemic to stop Peter's legal abuse of you!" (Exhibit J "It took a pandemic to stop Peter's abuse of you!" email)
- i. Around this time someone logged into the court filing system and changed my mailing address from 423 Linden Ave. **Wilmette** to 423 Linda Ave., **Chicago**.
- j. In June of 2021 I personally spoke to a clerk in the Domestic Relations Division and was told the change was made by someone logging in purporting to be me, not due to transcription or computer error.

- k. I had received mail without issue at this address for four years and after this notices were returned undeliverable (**Exhibit K** “Actual Docket” pdf).
- l. In April, 2020 there was a scheduled court appearance related to the PRTSC. I was never informed by Mr. Trowbridge. I was never informed by Michael Bender, GAL. I was never informed by opposing counsel. I was never informed by court mailing due to the address change.
- m. This date was postponed due to COVID.
- n. On July 6, 2020 there was a court appearance with all parties but me or anyone representing me in attendance. I was never informed by Mr. Trowbridge. I was never informed by Michael Bender, GAL. I was never informed by opposing counsel. I was never informed by mailing due to the aforementioned address change.
- o. On July 20, 2020, according to Court Docket, it appears there was to be a third scheduled date. Nobody informed me of this.
- p. I have no way of knowing what might have been discussed at the July 6th court hearing.
- q. Nobody informed me or followed up to ask why I wasn't at the July 6th, 2020 court appearance, including Michael Bender who serves as my children's Guardian Ad Litem and would presumably be curious why the mother of the children he is tasked with advocating skipped a court hearing.
- r. On July 12, 2020 I received a bill from Mr. Bender's office indicating he had attended court for my case. On this same date I wrote to Brad Trowbridge: “Zoom court? What?” (Exhibit L “Zoom court what?” email). **At this time Mr. Trowbridge still did not inform me that a PRTSC had been served on me**, writing:
- “We had a zoom court date of July 6 that I had on my calendar as July 7. **That could have only have been for a short time. I also don't know how much preparation there could have been. It looks like a lot of activities have been lumped into one line item.** The next zoom date is July 20 at 9 AM. **Anything I need to know?**”*
- s. Mr. Trowbridge has a close professional and personal relationship with Mr. Bender, GAL, and frequently has cause to speak to him. During the preceding seven months, according to Mr. Trowbridge, Mr. Bender repeatedly indicated to Mr. Trowbridge that he would be ending his assignment. He had written on January 22, 2020:

*“Bender already told the judge this would be his last request” (Exhibit N
“Bender told the judge this would be his last appearance” email)*

- t. Because Mr. Bender does not speak to me or my children, I had no way of knowing he was still acting as a Guardian Ad Litem, so I assumed the court appearances were an opportunity for him to step down.
- u. On July 22, 2020, still unaware of any PRTSC allegedly served on me on March 10, 2020, I specifically asked Mr. Trowbridge if Mr. Bender had finally stepped down and if anything had been filed against me, writing:
“ Hi Brad, Did Michael make a motion to be removed? Anything filed against me?” (Exhibit O”Anything filed against me?” email)
- v. On July 22, 2020 Mr. Trowbridge finally informed me of the PRTSC served on March 10, 2020. This was four months after the fact and after multiple scheduled court appearances. Mr. Trowbridge wrote:
“Peter filed this and it was supposed to be up in April when the courts were closed” (Exhibit M “Peter filed this” email).
- w. Mr. Trowbridge actually received this pleading, as certified by Mr. Wehrman’s notification of filing, on March 10, 2020 via email. Mr. Trowbridge clearly read this pleading in March, 2020 as I would only later realize, when I reviewed his invoice for this period. He billed me for reading it. (**Exhibit P** Trowbridge Invoice)
- x. Nevertheless Mr. Trowbridge still refuses to provide me with the email or NOF that he received with the PRTSC and maintains a curious fallacy that he did not get the PRTSC, claiming, “I didn’t receive anything” on June 11, 2021. (**Exhibit Q** “I didn’t receive anything” email).
- y. As in the case of Dr. Palen, when a party in this case commits malfeasance and then lies about doing so, it only intensifies the way their misconduct damages the entire credibility of proceedings before Judge Johnson.
- z. Clearly Mr. Trowbridge either willfully failed in his duties as my attorney or was somehow profoundly impaired.
- aa. Judge Johnson can not necessarily be blamed for Mr. Trowbridge’s misconduct.
- bb. However it is the responsibility of Judge Johnson to ensure officers in his court and other court professionals operate ethically and decently and to see that they are mentally and physically able to perform the important duties of advocating for parents and children.

- cc. In fact Mr. Bender, Mr. Wehrman and Judge Johnson, are all, as officers of the court, expected to report misconduct or unfitness they witness in other attorneys.
- dd. One can imagine any number of scenarios - physical calamity, addiction, illness, even death - where an officer of the court might be unable to serve.
- ee. It is the responsibility of all officers of the court to act vigilantly when another officer of the court might appear to be impaired or unable to serve the client.
- ff. As a lay person I would have thought it unusual for an attorney and his client not to file a response or appear at court for four months after a serious allegation of contempt was made and I remain curious as to why no one ever contacted me during this period.
- gg. By not ensuring that I had been notified and given the opportunity to participate in hearings in my own case, Judge Johnson has allowed a profound violation of my rights that suggests he is deeply biased against me.

Contempt ruling not based in fact

21. One further demonstration of bias is a finding of willful contempt of court that is not based in fact. Namely, Judge Johnson ruled that I had violated his November 20, 2019 order that, "Parents shall continue ABA Therapy". (**Exhibit R** November 20, 2019 ABA Order; **Exhibit W** Aug 21, 2020 Contempt Order).

- a. As part of his pattern of vexatious litigation, Mr. Matt has long made the claim that I interfere with our older child receiving Applied Behavioral Analysis (ABA) Therapy.
- b. ABA therapy is a kind of hands-on behavioral therapy for individuals with autism and other developmental disabilities.
- c. In fact, though ABA therapy has never been ordered or recommended by a medical doctor, I have enrolled our older child in this therapy and participated many times in this therapy since he was four years old. He's now thirteen.
- d. The basis of Mr. Matt's claim that I interfere with ABA therapy stems from his history of financial abuse and vexatious litigation and my attempts to protect myself in response. Notably:
 - i. On one occasion Mr. Matt committed in writing to pay the full \$14,000 for ABA therapy for that year because I was unemployed at the time and had no money to contribute. Later Mr. Matt brought a motion before Judge Johnson to sue me for the fees he'd previously committed to pay.

- ii. On another occasion I lost my job and emailed the ABA provider that day to tell her I needed to pause therapy until we could set up COBRA. Mr. Matt has used this in court as an example of me aggressively “blocking” ABA therapy because I was in financial distress.
- e. I maintain the alleged conflict is a ruse for abusive litigation. There has never been an “Issue” with ABA therapy.
- f. Nevertheless, on November 20, 2019, based only on instructions from Michael Bender, GAL, Judge Johnson entered an order that “The parties shall continue ABA therapy”.
- g. We have done so.
- h. In October, 2019 I enrolled my son in after school care on Monday and Tuesday afternoons so that I could work.
- i. As a result of work I am able to feed and house my children. I receive no maintenance or child support.
- j. I asked the after school program director to allow ABA therapists to push in therapy on Monday and Tuesday afternoons. The school staff said they could not accommodate this as it is a public school program and they cannot allow outside providers.
- k. ABA usually requires a minimum of three hours and it was impossible to fit in on the days I worked, but our son was continuing every other day of the week, subject to therapist availability.
- l. Mr. Matt has aggressively sought to sabotage my career as part of his ongoing emotional and financial abuse as well as to aggressively control my parenting time, contrary to the duly enacted parenting plan.
- m. In November of 2019, Mr. Matt threatened me with litigation for not doing ABA on Mondays and Tuesdays because of employment.
- n. Mr. Trowbridge, my then attorney, told me I had nothing to fear because the order was that ABA therapy continue, with no number of days or hours, no location, and no specific parental involvement mandated in the order. I was made to understand that the standard of proving contempt is (theoretically) very high and this could not possibly rise to that standard since ABA was continuing and any reasonable family law judge believes parental employment is good for children.
- o. Mr. Matt never raised this issue again, nor did Michael Bender serving as GAL. I would not learn there was an allegation of a problem until July, 2020, eight months later.

- p. At the time that the PRTSC alleging that I violated the order that “ABA shall continue” was filed on March 10, 2020 (without my knowledge), the entire state was locked down due to COVID. During Illinois’s COVID lockdown no parent, including Mr. Matt himself, could possibly have been expected to continue an in-person therapy.
- q. In fact, on June 5th, 2020, Mr. Matt texted me:
“Are you ok with me getting a new ABA provider? They continue dragging their feet providing services because of covid, while many other providers work”(Exhibit S “Are you ok with me getting a new ABA provider?” Text).
- r. During COVID lockdown some providers did offer Zoom therapy but this is not an approved or appropriate methodology for people who, due to developmental disabilities or cognitive impairment, lack the ability to regulate themselves and focus for sustained periods.
- s. Our older son has severe ADHD and struggles very much with sitting in front of a screen.
- t. Our older son reported to me in spring of 2020 that Mr. Matt was dragging him, kicking him and physically holding him down in a chair to force the Zoom therapy.
- u. This violence was also reported to me by my younger son who is neurotypical.
- v. I am a former teacher with a Masters Degree in Early Childhood Education and a trained mandated reporter.
- w. I recognized this behavior by Mr. Matt as abusive and reported this behavior to my older son’s school, to DCFS and to Michael Bender, GAL in the spring and summer of 2020.
- x. In the spring of 2020 my older son’s school offered us access to an ABA software called TeachTown which I was using with my son to provide ABA therapy modified for COVID lockdown.
- y. In an effort to try to reduce violence from his father and my son’s mistreatment I wrote to the ABA provider that we didn’t need the Zoom therapy because the school was providing software that was more appropriate for children of my son’s ability than a video conferencing tool.
- z. I had no way of knowing that there was anything wrong with this because, between March and July, 2020, nobody told me there was a contempt allegation or, more pointedly, nobody suggested there was an underlying issue that would necessitate a contempt allegation.

- aa. As a lay person it is my understanding that the purpose of a contempt finding is to ensure parties comply with judicial orders, not to inflict harm on individuals one does not like.
- bb. I believe I ought to have been able to explain that my employment and wish to prevent child abuse factored into my decisions and that I had every reason to believe I was in compliance with the order.
- cc. On August 21, 2020 we appeared before Judge Johnson for a hearing but Mr. Trowbridge did not speak, specifically he did not present any points from the response we drafted.
- dd. No evidence was presented by Mr. Matt to prove that I willfully violated the order that “ABA shall continue”.
- ee. I do not believe Judge Johnson fulfilled his duty to review the facts of the case.
- ff. On August 21, 2020 Judge Johnson found, “Megan Matt willfully and contumaciously failed to participate in the court ordered ABA therapy for A[REDACTED]”. This is untrue.
 - i. In order for me to have willfully defied the order I would have needed to know I violated it.
 - ii. In order to be contumacious, one must necessarily know they are in violation and stubbornly persist, which implies at least knowing at one time. I did not at any time know this.
- gg. On the face of it, I still maintain I was in compliance with an order that “Parents shall continue ABA therapy” as, barring lockdown and employment constraints, ABA was continuing.
- hh. Because the finding was so utterly unsupported by fact, Mr. Trowbridge told me upon ruling that he would immediately file a motion to reconsider.
 - ii. Mr. Trowbridge did not file a motion to reconsider.
- jj. Mr. Trowbridge stepped down as counsel forty days after the ruling, citing ongoing “computer issues” in the court system as one reason he could not continue.
- kk. Judge Johnson’s baseless contempt ruling was not based on fact and can therefore only be based on his bias.

22. One factor that has contributed to rulings not based in fact and the denial of due process by Judge Johnson is the appointment of Michael Bender as Guardian Ad Litem.

- A. Mr. Bender was appointed at the request of Peter Matt, who wished to control and harass me but was unable to find a legal basis to modify the parenting plan or to claim I was in non-compliance.
- B. To my understanding, having been divorced for two years, with no court motions pending, there was not a legal basis to diminish my parental rights in any way.
- C. Divorced women are not a separate class of citizens. We are entitled to the same rights as any other citizen and I ought to have been allowed to exercise my right to parent without state intervention, barring legitimate court proceedings.
- D. Having been appointed in the role of GAL, Mr. Bender has demonstrated a shocking inability or disinclination to advocate for my children.
 - a. In two years he has never spoken to my older son's developmental pediatrician, who is a faculty member of the University of Chicago and serves on many boards of the American Academy of Pediatrics.
 - b. In two years he has never spoken to any of my children's teachers or other school staff.
 - c. In two years he has never spoken to my older son's long term ABA therapist.
 - d. He does not respond to my emails or calls.
 - e. In two years he had never spoken to my children's doctors until my older son's pediatrician tried to reach Mr. Bender for two weeks in order to report to him a sealed visit note containing reports of child abuse. A court appearance occurred in this period, once the appearance was made and he had "nothing to report", he finally returned her call.
- E. Because of my concerns about Mr. Bender's commitment to his duty, it is therefore doubly concerning that Judge Johnson has frequently set aside my due process rights and assigned Mr. Bender, as GAL, to investigate, assess and form judgement on all matters relating to my case.
 - a. In early spring of 2021 I moved that a post-decree parenting evaluation be conducted (604.10 b) for a variety of reasons, but most significantly Mr. Matt's firm opposition to psychiatric medication, which has severely damaged our older son's well being and access to education as well as Mr. Matt's use of his medical decision right to incur excessive medical expenses in order to repeatedly sue me and cause harm.
 - b. Judge Johnson denied my motion and firmly stated that there was no basis or issue with parentage to warrant an investigation.

- c. At this time I told Judge Johnson that there were serious issues, such as Mr. Matt's tenement scheme and failure to supervise the children.
- d. At this time Judge Jonson told me, "If that's true, you need to file something or I can't do anything about it".
- e. I filed multiple Petitions, included here (Exhbits T, U, V).
- f. When I attempted to present these in court, Judge Johnson did not address me but spoke to Mr. Wehrman and said, "Mr. Wehrman, I suggest you talk to Mr. Bender and agree to a 604.10B or she's just going to keep doing this".
- g. On the face of this, Judge Johnson is obviously prejudiced against me if he had already decided my pleadings were a waste of time, as implied.
- h. During discussions to which I was not privy, Mr. Bender proffered to Mr. Wehrman a custody evaluation, with a custody evaluator hand selected by Mr. Bender, in exchange for denying me due process.
- i. Mr. Wehrman agreed and drafted the order for a custody evaluation.
- j. I beseeched Mr. Wehrman to limit the scope to my prior motion. Mr. Wehrman insisted on filing an order for an evaluation with no scope.
- k. I saw then and see now, that this custody evaluation is not in any way intended for my children's well being but just another example of individuals in this case seeking to silence my legitimate claims.
- l. At our next court appearance I attempted to get Judge Johnson to hear my motion for financial allocation with regard to Mr. Bender's fees; an allocation actually ordered by Judge Johnson himself at the time of Mr. Bender's appointment.
- m. Mr. Trowbridge stated, "Your honor, Bender said if we agreed to the custody evaluation we wouldn't have to deal with these".
- n. I also attempted Judge Johnson to rule on a motion I had filed to compel a subpoena related to the aforementioned financial allocation motion.
 - i. I had subpoenaed from Mr. Wehrman his record of payment from Mr. Matt.
 - 1. Mr. Matt had stated in his most recent financial affidavit related to the matter of allocation that he earns \$27,000 per year and has one bank account with \$1,000.

2. Mr. Matt uses a bank account he shares with his father, into which his father deposits gifts and loans, as well as profits from multiple international businesses which Mr. Matt refuses to disclose in tax or court filing.
 3. Mr. Matt also uses his business accounts for personal expenses, thereby managing to report losses in the US on his own personal spending.
 4. I simply wanted to show these accounts are available to Mr. Matt to pay Mr. Bender's fees.
 5. Because the allocation motion was for financial means to pay an attorney, it was appropriate to subpoena Mr. Wehrman's receipts from Mr. Matt.
- ii. Mr. Wehrman said, "Your honor, she just wants to show I'm laundering money for my client".
 - iii. I believe this was a joke.
 - iv. I am actually trained quarterly on anti money laundering law and a licensed financial advisor so I cannot be seen to joke or make light of financial activities that may be criminal.
 - v. Such interchanges are typical since Mr. Bender's appointment. I presented documentary evidence of wrongdoing. This documentary evidence was blocked by Mr. Bender and Mr. Wehrman. Then Mr. Wehrman and Mr. Bender later use my true statements as evidence of fancy or hysteria. Jokes at my expense are frequent in Judge Johnson's court.
 1. Mr. Wehrman in particular is in the habit of spewing long monologues at every status hearing in which he disparages me and uses disrespectful language.
 2. Mr. Wehrman degrades me by typically referring to me as "this woman" or "that woman".
 3. Mr. Wehrman makes generalized, untrue, disparaging statements not related to the proceedings such as "That woman lies", "This woman doesn't care about her children", "That woman can't be trusted", "That woman doesn't want to take care of her kids".

4. It is very obviously part of Mr. Wehrman's strategy to attempt to provoke an emotional reaction or outburst by tyrading against me. If this is obvious to me, it would seem obvious to a judge.
5. I have attempted to stop this by doing what I see on tv and saying, "Your honor, I object. Please ask Mr. Wehrman to speak to me respectfully".
6. Judge Johnson has never indicated to Mr. Wehrman that I should be addressed politely or that he should refrain from monologuing on alleged character flaws.

23. An unfortunate outcome of the irregularities in my case is that is a challenge for me to find counsel willing to represent me.

- A. At least four attorneys have told me in the last year that they will not work with me due to the negative regard with which the Judge and GAL regard me.
- B. This further supports my fear of bias.
- C. I retained [REDACTED] in the summer of 2021 as counsel.
- D. On November 8th I emailed [REDACTED] a summary of reports of suspected crimes in my case.
- E. On November 11th, three days after I explicitly stated that I suspected and had reported crimes, [REDACTED] moved to end the engagement against my objection, citing philosophical differences.
- F. I pleaded with Judge Johnson to not allow her to resign and described why this would do me material harm as a client.
- G. I did not know how or what to legally file to stop her motion, so I filed an affidavit and served it on parties. (**Exhibit Y** Affidavit Stating Objection)
- H. [REDACTED] was granted her request to quit and I am pro se.

24. The totality of events here are a basis for substitution of Judge Johnson for cause due to his overwhelming bias against me.

WHEREFORE, Respondent prays that the Court enters an order that:

- A. This case and all pending matters be immediately reassigned to a new judge in the Domestic Relations Division of Cook County Circuit Court.
- B. Mr. Bender's appointment as Guardian Ad Litem be immediately terminated..

- C. Any order entered in this case after the appearance of Bradley Trowbridge as my attorney on July 5, 2019 be overturned.
- D. That I be allowed to have clergy from Lake Street Church of Evanston and members of the Lake Street Church Peace and Justice Committee to be present to serve as civil rights observers in any future court appearances or meetings with court professionals.

Respectfully Submitted,

Megan (Matt) Mason
Pro Se Respondent

FILED DATE: 11/30/2021 9:32 AM 2016D009534

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION


IN RE THE FORMER MARRIAGE OF:)
PETER MATT,)
Petitioner,)
and)
MEGAN MATT,)
n/k/a MEGAN MASON,)
Respondent.)

Case No. 2016 D 009534

**AFFIDAVIT OF MEGAN MATT N/K/A MASON IN SUPPORT OF PETITION TO SUBSTITUTE
JUDGE FOR CAUSE**

I, MEGAN MATT n/k/a MASON, hereby submit this affidavit under penalties provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure and certify that the statements set forth in this affidavit are true and correct.

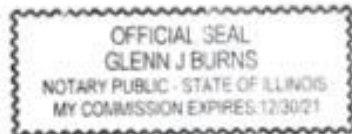
1. I am the Respondent in this matter.
2. I have personal knowledge of the matters stated in my PETITION TO SUBSTITUTE JUDGE FOR CAUSE and they are true and correct except as to those matters stated on information and belief, which are believed to be true.
3. I hereby restate and incorporate by reference the allegations contained in my Petition as if the same were set forth here verbatim.



Megan Mason, Pro Se Respondent



SUBSCRIBED AND SWORN TO BEFORE ME this 29 day of November, 2021.





Notary Public