

██████████ and T ██████████ to a new venue outside Cook County Illinois and convenient to both parties.

Legal Basis for Post-Decree Transfer

1. This post-decree transfer is legal and necessary under Federal Law. Section 1404(a) of Title 28 provides that: "for the convenience of parties and witnesses, ***in the interest of justice***, a district may transfer any civil action to any other district where it might have been brought."
2. Further, Illinois Law allows for the transfer of venue post decree. Specifically:

735 ILCS 5/2-1001.5) (from Ch. 110, par. 2-1001.5)
Sec. 2-1001.5. Change of venue.

(a) A change of venue in any civil action may be had when the court determines that any party may not receive a fair trial in the court in which the action is pending because the inhabitants of the county are prejudiced against the party, or his or her attorney, or the adverse party has an undue influence over the minds of the inhabitants.

(b) Every application for a change of venue by a party or his or her attorney shall be by petition, verified by the affidavit of the applicant. The petition shall set forth the facts upon which the petitioner bases his or her belief of prejudice of the inhabitants of the county or the undue influence of the adverse party over their minds, ***and must be supported by the affidavits of at least 2 other reputable persons residing in the county.*** The adverse party may controvert the petition by counter affidavits, and the court may grant or deny the petition as shall appear to be according to the right of the case.

(c) A petition for change of venue shall not be granted unless it is presented before trial or hearing begins and before the judge to whom it is presented has ruled on any substantial issue in the case, but ***if any ground for change of venue occurs thereafter, a petition for change of venue may be presented based upon that ground.***
3. I am including here two affidavits from Jillian Westerfield, Associate Pastor and Head of Youth Programs at Lake Street Church in Evanston, Illinois and Ms. Delane Haro, Instructor at Loyola University in Chicago, Illinois. (Exhibit F Westerfield Affidavit, Exhibit G Haro Affidavit)The parties are both upstanding citizens of Cook County familiar with matters in

this case and both know me well. Both attest to the veracity and suitability of my request for a transfer of venue based on the interest of justice

4. A multitude of inappropriate and concerning events have occurred after the original divorce proceeding commenced in October, 2016 making a post-decree change of venue necessary due to the undue influence of Mr. Matt and other opposing parties over the judges, staff and appointees in the Domestic Relations Division of the Circuit Court of Chicago.
5. In order to justify a transfer of venue “The petition shall set forth the facts upon which the petitioner bases his or her belief of prejudice of the inhabitants of the county or the undue influence of the adverse party over their minds.”
6. At issue is whether the “interest of justice” can be served or there is an “adverse influence” of one party over the minds of those determining cases. In my case, the opposing parties have an undue influence over those in power to determine my parentage and family law matters and therefore immediate transfer of venue is necessary.
7. Although divorce and parentage matters in Illinois are not heard by juries, it is obvious that Illinois law is not intended to exclude litigants from recourse to legal remedies because hearings are heard exclusively by judges.
8. And so, to the extent that the judges, appointees, staff and officers of the court collectively determine all outcomes of hearings in this division, they ought to be held to the same standards of fair trials as are expected of juries.
9. The staff, appointees and employees who collectively determine legal outcomes in the Domestic Relations Division of the Circuit Court of Chicago are so biased against me and the undue influence in favor of my former husband, Peter Matt, is so great, that an immediate transfer of venue is necessary.

Background

10. The parties were legally divorced on September 27, 2017 and entered into a Marital Settlement Agreement (MSA) and Allocation Judgment Parenting Plan (Exhibit A MSA Parenting Plan).
11. Two children were born of this marriage, A [REDACTED] and Th [REDACTED] [REDACTED] (aged 10).
12. The parties have been engaged in frequent litigation since divorcing in 2017, primarily initiated by Mr. Matt, who uses vexatious litigation as a method of financial and emotional abuse.
13. Mr. Matt has never proposed a change or modification to the parenting plan through motion.
14. Mr. Matt has sought Court intervention on numerous occasions in pursuit of his wish to force contact with me, to inflict financial harm to me and to control every moment of my parenting time.
15. The Court has appointed multiple individuals in post-decree actions.
 - a. Michael Bender was appointed Guardian Ad Litem on June 6, 2019 at Mr. Matt's request; I opposed the appointment. (Exhibit B GAL Order).
 - b. Dr. John Palen was appointed as Parenting Coordinator on September 25, 2020. I was never informed of Dr. Palen's potential appointment or asked if I approved. (Exhibit C PC Appointment)
 - c. Dr. Gerald Blechman was appointed as Custody Evaluator on May 25, 2021 with no scope or basis stated (Exhibit D 604.10b Order). I asked that a scope or basis to Dr. Blechman's appointment be described in the order but I was denied by Opposing Counsel (Exhibit E Opposition to Order Language).

Endemic Criminality

16. The primary evidence of the undue influence of other parties over the outcome of actions in my case is the large volume of crimes committed against me by parties in this case, some of which continue to this date.
17. In the course of post-decree litigation over parentage issues with Petitioner Peter Matt, I have been the victim of fraud upon me and fraud upon the court by my prior counsel, Bradley Trowbridge.
- a. These fraudulent acts ultimately contributed to a baseless ruling of contempt against me on August 21, 2020 which ultimately contributed to severe financial punishment and is now being used as a basis to move to revoke my parental decision rights by the opposing parties. (Exhibit L SOJ).
 - b. I was originally referred to Mr. Trowbridge by an individual at Lifespan, a Domestic Violence advocacy and legal resource nonprofit, in May, 2019. I had been referred to the organization by Kaethe Morris Hoffer who is a fellow congregant at Lake Street Church of Evanston. I became introduced to Ms. Hoffer by Jillian Westerfield who had suggested I speak to her after witnessing domestic violence by Mr. Matt.
 - c. Namely, Mr. Matt had called and emailed Ms. Westerfield two times to threaten that he would have my children dragged out of the court by police if they attended church during my parenting time. (Exhibit I PRTSC RE Harassment)
 - d. Although I did not qualify for legal support from Lifespan, they had listed Mr. Trowbridge as an attorney who works with domestic violence victims and provided his name in a resource list mailed to me.

- e. In addition to being an attorney, Mr. Trowbridge stated to me that he is a former social worker and from the initial meeting this inspired a higher level of personal trust in me than is normal with an attorney.
- f. When Michael Bender was appointed as Guardian Ad Litem on June 6, 2019, I believed it was an illegal infringement of my parenting rights, unsupported by law. I still believe this as Illinois Law allows for the appointment of a GAL during any proceeding but there was no proceeding and parties were divorced at the time of the appointment.
- g. I borrowed money from a friend in order to retain Mr. Trowbridge to get the GAL appointment overturned. However, when I met Mr. Trowbridge he explained that Mr. Bender was a close associate of his and that I should try to work with him.
- h. It was my understanding from Mr. Trowbridge that he was in regular contact and communication with Mr. Bender from the time I retained him to the time he resigned in October, 2020. Prior to my first meeting with Michael Bender, Mr. Trowbridge had spoken to him privately. I do not know what was discussed. (Exhibit J He Mentioned You Two Had Spoken).
- i. From the time of his engagement, Mr. Trowbridge asserted that he wanted to protect me from the stress of Mr. Matt's vexatious litigation and to literally "keep me out of court". I was discouraged by Mr. Trowbridge from attending hearings as a strategy to reduce Mr. Matt's opportunity to harass me, Mr. Trowbridge claimed.
- j. Between March 10, 2020 and July 13, 2020 Mr. Trowbridge, hid a contempt allegation filed against me by Peter Matt (Exhibit K March Contempt).
- k. According to affidavit entered under threat of perjury by Christopher Wehrman, opposing counsel, Mr. Trowbridge was served a PRTSC on my behalf on March

10, via email. According to Mr. Wehrman's affidavit and Court Records this March PRTSC was filed on March 10, 2002 and emailed to the email address I know to be Mr. Trowbridge's regular email. It was set for hearing on March 20, 2020.

- I. Mr. Trowbridge billed me for reading this Petition for Rule to Show Cause on March 10, 2020 as invoiced on April 17, 2020 (Exhibit L SOJ).
- m. However, Mr. Trowbridge not only did not tell me about the PRTSC. He explicitly denied that there were pleadings filed against me on two subsequent occasions. (Exhibit L SOJ).
 - i. On April 22, 2020, I wrote to Mr. Trowbridge:

"I hope you're well and your clients are not suffering too badly from quarantine. I'm personally quite pleased that no motions are being filed right now, a nice break =)."
 - ii. On April 22, 2020, Mr. Trowbridge wrote back:

"Megan. Yes, unfortunately it took a pandemic to stop Peter's abuse of you!"
 - iii. At this time Mr. Trowbridge made no mention of a PRTSC or an underlying concern necessitating a PRTSC.
 - iv. On July 12, 2020 I became aware that Mr. Bender had attended a court appearance on behalf of my minor children by reading about it on his invoice. I wrote to Mr. Trowbridge:

"Zoom court? What?"
 - v. Mr. Trowbridge wrote back within the day. He not only failed to mention the PRTSC from four months earlier but specifically played down the importance of this appearance, writing back to say:

"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?"

- vi. On July 22, 2020, still unaware of a contempt allegation or a PRTSC served on me, knowing only that Mr. Trowbridge had told me Mr. Bender was resigning imminently, I wrote to Mr. Trowbridge:

*“ Hi Brad, Did Michael make a motion to be removed?
Anything filed against me?”*
- vii. Mr. Trowbridge finally served me the PRTSC on July 22, 2020.
- n. Mr. Trowbridge also did not inform me of court hearings scheduled on March 20, 2020, and multiple hearing dates rescheduled due to COVID between March 20, 2020 and July 6, 2020 or a hearing actually held on July 6, 2020.
- o. Mr. Trowbridge has lied about receiving notice on multiple subsequent occasions and still refuses to provide the original proof of service. (Exhibit L SOJ)
- p. I was never presented with evidence supporting a contempt claim and from what I can find none was ever filed by opposing counsel in support of the contempt allegation, though I do recall Mr. Wehrman screen sharing one or two images during the fifteen minutes before Judge Johnson that was called a trial.
- q. I believed a contempt ruling was impossible because on March 10, 2020 I was alleged to have refused to facilitate ABA therapy, an in-home therapy for our older son, Angus.
- r. ABA, though never prescribed or suggested by a doctor, had been ordered by Judge Johnson at the request of Michael Bender, GAL. The order, specifically, was “ABA shall continue”, with no location, no hours or other scope listed. (Exhibit M ABA Shall Continue).
- s. There was no in-home therapy for children in March, April, May, June in Cook County, Illinois in this period due to COVID restrictions.

- t. On August 21, 2020 I was held in contempt for refusing to facilitate ABA therapy during the period when in-home therapy was banned. I vehemently opposed this ruling.
 - u. Mr. Trowbridge promised to file a motion to reconsider at which time he would present a text message from Mr. Matt in which he said, "can we get a new provider because Reach does not provide ABA?" (Exhibit L SOJ).
 - v. Mr. Trowbridge did not file a motion to reconsider and resigned a week after the thirty day period to file an appeal or motion to reconsider had lapsed citing "computer issues in the courts" and personal issues.
 - w. Mr. Trowbridge also indicated he would not be doing work as an attorney going forward due to another unnamed job. I have later become aware that Mr. Trowbride operates a custody supervision service, Safe Travels LLC and was listed as a court approved child representative in a list created by the Domestic Relations Division of the Circuit Court of Chicago on July 22, 2020. No conflict of interest was ever disclosed to me by Mr. Trowbridge. (Exhibit M Child Rep List)
18. I fear the baseless ruling of contempt was orchestrated to lend legitimacy to proceedings that are anything but legitimate.
19. Mr. Bender had been appointed on June 6, 2019. During this time there were no motions by parties to consider and Mr. Bender did not perform any duties other than levying fees and responding to Mr. Matt's emails and calls. He does not read my emails as a rule. Mr. Bender has never spoken to any of the children's teachers or therapists and would not speak to any of the children's doctors until September, 2021, more than two years after his first appointment.

20. At no point did I or Mr. Trowbridge attend one of the three status calls during the spring and summer of 2020. Mr. Wehrman, opposing counsel, and Mr. Michael Bender, GAL and Judge Johnson were present at all of these proceedings and in communication. Neither party ever contacted me to inquire about my absence, lack of response, or to inform me that an allegation of contempt was made against me.
21. Notably, Mr. Bender was ostensibly serving as an advocate for my children as a GAL and did not take any action to intervene in an alleged failure toward the children on my part. After all, how could a parentage issue rise to the level of a contempt ruling though not inspire a dutiful GAL to so much as shoot off an email over the course of four months?
22. During this same period I was under the impression that Mr. Trowbridge was in frequent contact with Mr. Bender who, according to Mr. Trowbridge, was preparing to step down from the case. This is evidenced by my repeated question, "Did Bender step down?" (Exhibit L SOJ).
23. Mr. Trowbridge's malfeasance cannot be entirely blamed on others but it has nonetheless tainted every proceeding since his involvement in the case and I genuinely do not believe that any ruling can be ultimately upheld on appeal due to this taint.
24. I am further unfairly denied justice because I have also been forced to participate in criminal activity by court order on two occasions. On March 4, 2021 I was ordered by the court to reimburse Mr. Matt \$4,266.21 for health insurance I knew him to obtain fraudulently.
 - a. Mr. Matt does not believe in the traditional taxation system and therefore keeps his considerable family wealth and assets hidden abroad.

- b. Although he paid for his Wilmette home and his MBA degree with cash, Mr. Matt enjoys displaying a facade of poverty and on two occasions he has engaged in welfare fraud. (Exhibit N Financial Allocation).
 - c. In the first instance Mr. Matt attempted to enroll our children in Food Stamps and Aid to Families with Dependent Children.
 - d. In this second instance Mr. Matt enrolled our younger son T [REDACTED], who is my dependent by Court order, in the Allkids health insurance program, either by falsely claiming him as a dependent or by providing false tax records.
 - e. Mr. Matt had enrolled the children in the state plans, despite my wish to cover them with my much cheaper, much better employer insurance, in order to generate excessive medical costs to then sue me for them.
 - f. Despite my objections that Mr. Matt had obtained government subsidized health insurance illegally, I was forced by Court Order to reimburse Mr. Matt for payments to the Allkids plan.
25. On another occasion, Mr. Matt was supported by Dr. John Palen, the court ordered parenting coordinator, in attempting to force me to engage in a criminal scheme. Mr. Matt disclosed to myself and Dr. John Palen in a meeting that he planned to fraudulently name our son, who has profound intellectual disabilities and does not consistently count to ten at age thirteen, as CEO of his company in order to claim his company is owned by a disabled person (Exhibit L SOJ).
- a. Mr. Matt wished to have his company named as a disabled person owned business and therefore get contracts from companies wishing to support companies owned by disabled people.

- b. My son does not own and operate Mr. Matt's businesses, as such a certification requires. To state that he does, is fraud.
 - c. Mr. Matt wished to have Dr. Palen order me, as his mother, "not to interfere" with his criminal scheme.
 - d. I stated that this is fraud and he should not do this.
 - e. Dr. Palen, who I was forced by court order to pay and defer my parenting decisions to, suggested Mr. Matt should create a business plan.
 - f. At this time I further stated I was opposed to our son being named CEO because it might interrupt his future access to Social Security disability benefits. Mr. Matt wrote that this would not be an issue because, when A [REDACTED] eighteen, his shares would "revert" to Mr. Matt.
 - g. There is no legal method of gifting to a vulnerable person in order to defraud a business partner and then "reverting" (stealing) the gift after the fraud, tax benefit or other means have been achieved.
 - h. I am a licensed financial advisor and fiduciary who cannot be associated with financial crimes but I have been continually forced by Court Order to compensate Mr. Matt for services procured illegally and to be associated with his criminal schemes while under the authority of Dr. John Palen in the role of Court appointed Parenting Coordinator.
 - i. This jeopardizes my livelihood which is necessary to support my children.
26. In my employment in financial services I am also trained to monitor and intervene where I see vulnerable people fall subject to criminal schemes. I fear for my son, A [REDACTED] I believe may have been exploited or may come to be exploited in the following ways by Mr. Matt, Dr. Palen and others involved in this case:

- a. I fear A [REDACTED] identity may be used to launder money , by disguising funds from businesses not disclosed to the IRS as gifts or loans from Angus's wealthy German grandfather to Angus for his care;
 - b. I fear A [REDACTED] disability and minor child status may be exploited in order to create trusts, businesses and other structures wholly intended to launder money, remit payment to other parties and to evade taxation;
 - c. I fear A [REDACTED] disability and minor child status may be used as a basis to appoint individuals as executors, guardians, trustees or other paid roles for as a means to receive kickbacks or bribes;
 - d. I fear A [REDACTED] identity may be used as a means for further fraudulent activity of the type already proposed by Mr. Matt.
27. Given that A [REDACTED] already been the target of an open scheme to defraud him, supported by appointees of this court, I am also submitting this petition on behalf of A [REDACTED] A [REDACTED] a right to trust that the of ficers and appointees of the court entrusted with the sacred duty of protecting him are acting in the interest of justice. This makes immediate transfer necessary.
28. Given my concern for my children's well being in light of continued financial misdealings, it is particularly troubling that Court appointed professionals and attorneys have sought to hide financial misbehavior by Mr. Matt.
- a. On November 24, 2020 I filed a motion for an allocation of fees (Exhibit N Financial Allocation), including the GAL fees, which Judge Johnson had ordered for allocation and ordered parties to exchange documents on June 6, 2019 (Exhibit B GAL Order).

- b. On January 19, 2021, in support of this motion for Allocation of Fees, I served Mr. Wehrman with a subpoena for payments from Mr. Matt (Exhibit O Payment Subpoena). I know Mr. Matt to own and control at least five bank accounts not disclosed in his financial affidavit.
- c. Bank statements, canceled checks, court filings and company financial statements were presented in support of the Motion for Financial Allocation and Payment Subpoena.
- d. One bank account is held at Wintrust. Mr. Matt shares this account with his father, Leo Matt, who resides in Germany. This account has been used to wire funds from Mr. Matt's unreported businesses: Goedecke Germany, Goedecke Poland and Goedecke India as well as cash from the over \$1 million I know Mr. Matt to hold in personal investments and accounts held abroad.
- e. Because Mr. Matt does not report these businesses or assets to the IRS it is difficult for him to wire funds directly to himself, so Mr. Matt and his father call the funds "loans" and "gifts" from Mr. Matt's father. Mr. Matt did not disclose this Wintrust account in his financial affidavit.
- f. Because the financial allocation hearing was to determine means to pay for an attorney in the role of Guardian Ad Litem, I subpoenaed Mr. Wehrman to provide a record of all payments from Mr. Matt and source accounts, reasoning Mr. Matt's method and means of paying his own attorney were relevant to his ability to pay an attorney in the role of GAL. In particular I believe Mr. Matt uses his Wintrust Account as a means to pay Mr. Wehrman.
- g. Mr. Wehrman did not provide me with the financial details and filed a motion to quash my subpoena.

- h. On March 4, 2020, without hearing, Judge Johnson denied my motion for allocation of fees but reserved the right to rule on allocation of GAL fees and the subpoena for financial documents. Judge Johnson said that he found it concerning that Mr. Matt was claiming an annual income of \$27,000 given his lifestyle, and suggested we negotiate a division of fees. We were unable to.
 - i. On May 25, 2021, with no stated basis or underlying motion by either party, Judge Johnson ordered Gerald Blechmen to be appointed as a Custody Evaluator.
 - j. On May 25, 2021 I asked Judge Johnson to rule on Mr. Wehrman's motion to quash my subpoena and to schedule a hearing on allocation of fees. Mr. Wehrman stated, "Your honor, Mr. Bender said we wouldn't have to deal with these [pleadings] if we agreed to a 604.10 B [Custody Evaluation]".
 - k. Judge Johnson still refuses to hear my motion for an allocation of fees. He instead on November 21, 2021 ordered me to pay Mr. Bender GAL, who he has described as a friend and mentor, without reviewing facts related to my ability to pay.
 - l. It is my belief that Judge Johnson did not wish to embarrass Mr. Bender and Mr. Wehrman by letting the Motion for Financial Allocation and subpoenaed documents be revealed in open court.
 - m. This is a clear indication of the need for a transfer to a neutral venue due to the unrelenting influence of cronyism and collegiality.
 - n. I am currently in the process of filing for bankruptcy due to the tremendous financial burden this ongoing judicial harassment has caused me.
29. I have also observed and documented child abuse and neglect by Mr. Matt which court appointees have aggressively hidden. I hold a Masters Degree in Education, have previously taught and worked as a supervisor in child care settings, have taught child

development at the college level, and am a trained mandated reporter. I am trained and very familiar with appropriate observation, interview and reporting methods where child abuse has been alleged or suspected.

- a. Mr. Bender in his role as Guardian Ad Litem has sought to hide reports of Mr. Matt's abusive behaviors or parental unfitness on repeated occasions. (Exhibit H 2nd Motion to Terminate GAL).
- b. In the PRTSC Regarding Failure to Supervise Children, Mr. Bender was presented with extensive documentary evidence of Mr. Matt's refusal or inability to provide appropriate supervision for our children, among other concerning behaviors. In the PRTSC Regarding Strange Adults in the Children's Home, Mr. Bender was made aware of Mr. Matt's plan to convert his zoned single family home into a tenement building for single men. Mr. Matt to this date refuses to get background checks for the men residing in the home who have unchecked access to our children's living quarters and bedrooms. In the PRTSC Regarding Harassment, Mr. Bender read two threats Mr. Matt emailed to members of my church and a police report stating that Mr. Matt's persistent parenting time violations need to be heard by a judge. (Exhibit I PRTSC RE Harassment, Exhibit P PRTSC RE Strange Adults in the Children's Home, Exhibit Q RE Failure to provide child care).
- c. In addition to specific acts committed by Mr. Matt, the documents contain disturbing examples of Mr. Matt's emotionally abusive method of interacting with me and his ease in lying and gaslighting in order to manipulate others.
- d. Mr. Bender agreed not to allow any of the disturbing matters presented in the above Petitions to be heard as part of the deal with Mr. Wehrman to initiate a Custody Evaluation.

- e. Subsequent to these filings, reports of domestic violence have been raised by myself and credible third parties but Mr. Bender has sought to mischaracterize or hide these reports in order to protect his own and Mr. Matt's reputation.
- f. On Monday, July 26, 2021 I attended a meeting with my younger son T [REDACTED], then aged nine, and Dr. Gerald Blechman, Custody Evaluator on Monday. At this time T [REDACTED] expressed suicidal ideation to Dr. Blechman and myself, stating multiple times that he wished to kill himself.
- g. At the time neither Dr. Blechman nor myself believed T [REDACTED] actually intended self harm, but I was concerned about his mental well being. Dr. Blechman also stated that he felt T [REDACTED] seemed distressed.
- h. That evening T [REDACTED] became further distressed and said the reason that he wants to kill himself is because his dad makes him go to Northwestern. He also said his dad told him he needs to have perfect MAP [standardized test] scores. He cried and said that he doesn't want to go to his dad's any more.
- i. Northwestern refers to The Northwestern Center for Talent Development, an enrichment program Mr. Matt makes Teddy attend despite his opposition.
- j. On Tuesday, July 28th, 2021 I wrote to my attorney at the time, [REDACTED] concerned that T [REDACTED] distress might be used to disparage or discredit me.
- k. [REDACTED] was concerned about T [REDACTED] behavior and called Michael Bender that day to report the incident and express an interest in removing T [REDACTED] from his father's home while this matter could be investigated.
- l. After picking T [REDACTED] from soccer camp on Tuesday, July 28th, 2021, I was driving T [REDACTED] and his brother A [REDACTED] to the community pool to swim when he escalated his talk of self harm to action. I recounted the events to my attorney:

"I was in the car around 5 today, driving T [REDACTED] and A [REDACTED] home from camp. T [REDACTED] picked up a plastic wrapper in the backseat and covered his mouth. He said he was going to kill himself. A [REDACTED] and I both told him not to do it.

I asked why he wanted to kill himself. He said he wasn't good at anything. I said I thought he was good at a lot of things, why does he think that. He said I'm not good at anything.

A [REDACTED] yelled, is it because of Dad's lies. T [REDACTED] didn't say anything. I said, what do you mean about Dad's lies. A [REDACTED], dad' s lies!

I asked T [REDACTED] if he still wanted to go to the pool, where we were headed, he said I'm going to drown myself. I said I would be really sad if that happened. Because he goes to his dad's tomorrow, I asked him if he was sad about going to his dad's. He said he was and started to cry,

I asked T [REDACTED] would like me to make it so he doesn't go back to his dad' s. He said there's no way that would ever work. I told him that I actually could do that if that's what he needs.

He said wouldn't he get really mean to you? I said it was ok if his dad's mad at me, we just need to keep him safe."

- m. I was concerned because T [REDACTED] had escalated his self harming behaviors to a physical act, not just words, so I called his pediatrician, Dr. Patricia Brunner, the next morning, Wednesday, July 29th, 2021.
- n. Dr. Brunner instructed me not to send T [REDACTED] to camp, that she wanted to see him first.
- o. At 5:00pm Mr. Matt met me at Dr. Brunner's office with T [REDACTED], who was now in his care per court ordered parenting time. T [REDACTED], Mr. Matt and I entered Dr. Brunner's office and she interviewed T [REDACTED] in our presence. After exchanging greetings, neither Mr. Matt nor I spoke. Dr. Brunner asked T [REDACTED] a number of questions. He stated to her that he knew he was there because he had said he wanted to kill himself. He said he first said it on Monday, the day of his appointment with Dr. Blechman. T [REDACTED] also

- stated to Dr. Brunner that he didn't want to go to his dad's house and he didn't want to do Northwestern.
- p. That day Dr. Brunner called Mr. Bender who could not be reached and did not return her calls.
 - q. On Saturday, August 7th, 2021 T [REDACTED] and his brother A [REDACTED] returned to my residence per Parenting Plan. After dinner on that date I asked T [REDACTED] if he had ever seen his dad hit or drag his brother, A [REDACTED]. A [REDACTED] had reported to me that during the Covid lockdowns Mr. Matt had hit him, kicked him and physically restrained him in order to force him to do Zoom therapy. I asked T [REDACTED] if that was true. T [REDACTED] said, "Yes it was really bad during COVID."
 - r. I asked T [REDACTED] if his father ever hit him (T [REDACTED] He nodded his head. I asked him where his dad hit him, he put his hand on his right cheek.
 - s. I asked why his dad had hit him. T [REDACTED] said, "Northwestern".
 - t. T [REDACTED] then started crying and hid his face with his hands. He said he didn't want to talk about it.
 - u. At this same time T [REDACTED] had been congested, feverish and had a sore throat.
 - v. On Wednesday, August 11th, T [REDACTED] was ordered to have a COVID test and a telehealth appointment at his pediatrician's office with Dr. Shoshana Woskow. I told Dr. Woskow during this appointment that I am a trauma survivor and I have learned that ongoing illness of the type that T [REDACTED] was experiencing is sometimes the result of trauma which weakens a person's immune response. I told Dr. Woskow that T [REDACTED] recently reported physical violence in the home at his father's residence.
 - w. Dr. Woskow questioned T [REDACTED] and he reported to Dr. Woskow that his father had hit him with the back of the hand. At first he said "He hit my face". Mr. Matt is right handed

and, were he to backhand T [REDACTED] on the face, his hand would hit the right side where T [REDACTED] first indicated to me he had been hit. T [REDACTED] became upset and said, "never mind, he hit my arm" then he said, "never mind, he didn't hit me". T [REDACTED] wanted to hide his face and not be on screen. T [REDACTED] also reported that his dad had locked him in his room "to do math worksheets". He also stated that when he told his dad he didn't want to do "Northwestern" his dad told him he would force him to stay up all night if he refused to do the work.

- x. On August 11th, 2021 Dr. Woskow recorded these events in a sealed record which I was not allowed to access in order to protect T [REDACTED] during an investigative process. I still do not have this record though I believe it may have been given or offered to Mr. Bender.
 - y. Dr. Woskow indicated that Dr. Brunner would call Mr. Bender. Dr. Brunner did again attempt to call Mr. Bender that same day but could not reach him. He did not return her calls. He had not returned her call from the week before regarding the suicidal ideation reports.
 - z. In fact, two years after his appointment Mr. Bender had never spoken to any of the children's doctors, therapists, or teachers, though he purported to have opinions on medical and educational matters.
 - aa. Due to Mr. Bender's intentional failure to intervene, a proper investigation was made virtually impossible.
30. Mr. Bender's actions, whether induced to hide abuse by Mr. Matt or out of a personal interest in protecting his reputation, have been profoundly damaging to to Teddy who has

disclosed to me and this therapist that he is fearful of punishment by his father if he speaks the truth or voices disagreement.

31. On August 25, 2021, over four weeks after Dr. Patricia Brunner had made an urgent call to Mr. Bender reporting her concern about T█████ wellbeing, Mr. Bender appeared at a status hearing before Judge Johnson. At this time, Mr. Bender stated that he had talked to Dr. Blechman and Dr. Blechman had relayed that T█████ was a little upset but didn't think he would kill himself. Mr. Bender made no reference to the reports from the children's pediatricians because he had intentionally avoided receiving the reports for a month at this time. ██████ asked the judge to have Mr. Bender interview T█████ Mr. Bender stated he would speak to T█████ to my knowledge he never did.
32. When the initial issues of neglect and unsafe parenting were presented in one of three petitions I attempted to present in the spring of 2021, Judge Johnson said, "These seem like some serious issues. I'll have Mr. Bender look at these and if there's anything there he'll let me know." (Exhibit I PRTSC RE Harassment, Exhibit P PRTSC RE Strange Adults, Exhibit Q PRTSC RE Failure to provide child care).
33. Mr. Bender has blocked these pleadings from being heard though they present documentary evidence that overwhelmingly demonstrates the complaints raised therein. Mr. Matt has responded to the pleadings but has never provided counter-argument or contradictory evidence.
34. When Mr. Wehrman stated on May 25, 2021 that "Mr. Bender said we wouldn't have to deal with these if we agreed to a 604.10 B", he was referring to the voluminous evidence of

parental misconduct and unfitness disclosed in these pleadings, as well as to the Allocation of Fees Motion. In other words, the Custody Evaluation was proffered as a means to hide money laundering, tax fraud, and reports of abuse by credible third parties such as police and clergy.

35. Mr. Wehrman further used his private influence with Judge Johnson to hide evidence of Mr. Matt's parental misconduct. (Exhibit L SOJ)

- a. On May 27, 2021 I scheduled a hearing on my motion for allocation of fees as well as the the PRTSC RE Harassment, the PRTSC RE Strange adults in the children's home and the PRTSC RE Failure to provide childcare. I scheduled this hearing using standard procedure and was assigned a court date.
- b. Mr. Wehrman, upon learning that a trial would be held which would disclose serious misconduct by his client, wrote to Judge Johnson's clerk, Ms. Kaye Mason, and asked her to do him the favor of canceling the hearing.
- c. Ms. Mason verbally relayed Mr. Wehrman's private email request to Judge Johnson.
- d. Judge Johnson verbally approved Mr. Wehrman's request for the favor of denying me a hearing.
- e. Ms. Mason informed us via email that the hearing was canceled.

36. The criminal violations against me by Mr. Bradley Trowbridge, court ordered participation in criminal activity, and activity by officers of the court to hide ongoing crimes whether each on the face of it demonstrate that a fair proceeding is impossible for me in The Domestic Relations Division of The Circuit Court of Chicago due to widespread, stubborn criminality by individuals involved in this case.

37. I am unable to retain counsel due to my status as a target of crime. This was made evident when I emailed my most recent attorney, [REDACTED] subject line, "Crimes I've reported to you" on November 8, 2021, and demanded help in stopping ongoing crimes against me and bringing these facts to Court. (Exhibit R Crimes I've Reported)

a. [REDACTED]

days later.

b. I asked Judge Johnson to please deny [REDACTED] motion until counsel could be found to replace her and stated that her abrupt departure would cause me material harm and imperils me and my children. Judge Johnson ignored my request and allowed [REDACTED] attorney to replace her (Exhibit S Affidavit Objecting to Withdrawl)

38. Further, I am subject to ongoing interference and fraudulent behaviors using the court's technology. In June of 2021 I had occasion to visit the Domestic Relations Division Clerks' office to review the docket of my case, after having been told by an attorney I was interviewing how to look at the Docket online.

a. When I reviewed the Docket I noticed a number of events that I didn't understand.

b. In March of 2020 my address was altered. My official address of record in the court software was 423 Linden Ave. in Wilmette when my divorce commenced in Fall, 2016 and remained unchanged for four years.

c. Around March, 2020 my address was changed from 423 Linden Ave., **Wilmette** to 423 Linda Ave., **Chicago** in March, 2020. I was told by a clerk that this was by an individual logging in purporting to be me.

- d. Subsequently, three mailings were returned to the court addressee not found, notices of court appearances I did not know were taking place because they were hidden by Brad Trowbridge and all other parties. (Exhibit T Notifications of Returned Service)
 - e. In June, 2021, when I consulted an employee at the Domestic Relations Records Division she told me that on July 22, 2020 someone filed a pro se appearance on my behalf while I believed I was represented by Brad Trowbridge.
 - f. On July 21, 2020 I had informed Brad Trowbridge via email that I had filed an ARDC complaint against Michael Bender with the Illinois Bar.
 - g. At this time this same clerk informed me that these changes could not have been the result of computer error or transcription error. She told me that someone purporting to be me made these changes using a spoof email.
39. On February 10 I had occasion to visit the Records Division of the Domestic Relations Division. I spoke to Ms. Chevon Edmondson and who brought over her supervisor, Ms. Laurie Garner.
- a. I asked Ms. Garner for contact information for the person who handles internet security for the court because I had reason to fear my identity had been stolen and fraudulent actions made. I told Ms. Garner that someone had changed my mailing address from 423 Linden Ave. in **Wilmette** to 423 Linda Ave. in **Chicago**. I indicated that I was pursuing litigation for the court's failure to protect my identity and I needed to speak to someone who could explain how these changes were made. Ms. Garner told me I could not have a phone number for someone to speak to about

data security and Ms. Garner took my name and telephone number and indicated “her Chief” would call me. Nobody has called me as of this filing.

40. Fraudulent service information remains in Odyssey File, the courts E-file software, and I have no recourse to correct it.

a. On February 10 I logged into Odyssey File again and noticed that my prior attorney,

[REDACTED]

attorneys are still listed as representing me though she had resigned in November, 2021 and I am currently pro se. I reviewed [REDACTED] contact details in Odyssey File and noted that her address for services has been changed to 423 LINDA APT 2E CHICAGO IL 680910000 with no email given. [REDACTED] sly listed a

work email in her contact information and her firm’s address: [REDACTED]
[REDACTED]

b. On this same date I wrote to [REDACTED] could please remove the contact.

c. [REDACTED] d af [REDACTED] firmed that her contact was indeed altered in the Efile profile but informed me that they had to be made by an employee of the clerk’s office and that she knew no way to remove herself as a service contact..

d. Having attempted to speak to an individual in the records division of the Domestic Relations Division of the Circuit Court of Chicago, I remain at this date unable to correct my digital identity in the court’s software, further necessitating a transfer to a venue that will uphold my legal documentary rights.

- e. Because of the frankly brazen deception that I have witnessed by sworn officers of the court, I emailed a video screenshot of myself logging into Odyssey File and displaying the fraudulent service information on February 16th, 2022 to Ms. Brianna Steger, attorney for this Court, so that there might be no suggestion at a future date that, for example, such a claim of fraud is indicative of my mental unfitness.
41. It is a most basic principle of justice that methods be in place to protect the integrity of data, whether in paper or electronic filings, and to correct errors in the same. It is simply impossible for me to believe that Domestic Relations Division of the Circuit Court of Chicago can do this in my case given that I cannot even trust that I will be provided notice of actions in my case or have recourse in the event of other parties' failure to provide notice.
42. In the interest of the most basic semblance of justice my case must be transferred due to the inability of me to have accurate court records in the present venue
43. I am now pro se. Practices intended to hide court activity from me persist by parties in this case. Mr. Wehrman has attested to serving notice to me of a new PRTSC. He has not.
- a. On February 8th, 2022 Christopher Wehrman filed an attestation that he had served me a PRTSC. In this attestation, Mr. Wehrman indicated he served me by email. He indicated that the email address used was [REDACTED]
 - b. As of February 16, 2022 I have received no service from Mr. Wehrman.
 - c. As of February 16, 2022 I have not received the standard computer generated notice of filing from the court itself.
44. Further it is impossible to access the normal methods of recourse such as appeals to a higher court or motions to substitute a judge that would typically be available to litigants in an American courtroom due to the well known collegiality and self protective tendencies of

judges in this Division. This was exemplified in a recent hearing before Judge Matthew Link on January 6th, 2022 at which time I presented a Motion to Substitute Judge for Cause due to bias, raising most of the issues evidence presented here in my petition.

- a. At issue is not Judge Link's ruling or analysis, which is subject to appellate oversight in a functioning court system. Rather, at issue is Judge Link's active participation in hiding pro se communications by his colleagues which exemplifies the conflict when judges are confronted with information damaging to their colleagues.
- b. This necessitates a change of venue.
- c. Although many serious factors were raised in my motion to substitute judge Johnson due to bias, and never refuted by Judge Johnson via affidavit as statute allows, a key issue presented was ongoing ex parte communication between Mr. Wehrman, Mr. Bender, and Judge Johnson via his clerk, Kaye Mason, as well as other court appointed professionals in a secret email thread about my case.
- d. I raised as evidence at this proceeding an email from Dr. John Palen, PC, on which I was accidentally copied because I share the same last name as Judge Johnson's clerk, Kaye Mason on Dec 3, 2020.
- e. In this email, which included Mr. Bender, Mr. Wehrman, and Ms. Kaye Mason as a proxy for Judge Johnson, with the subject "IRMO Matt: 2016 D 9534; COURT ORDER", Dr. Palen wrote a single line, apparently part of a larger thread, "I want to be paid. It is as simple as that."
- f. I was accidentally copied as is evidenced by Dr. Palen's follow up email in which he deceitfully claimed that this email was not intended for me and related to another case.

- g. It is utterly implausible that this email related to another case given that there was no opposing party copied other than myself, accidentally, and the subject of the email was my married name and case number.
- h. I have attempted on multiple occasions to get Dr. Palen, Mr. Bender, Mr. Wehrman, and Ms. Mason to comply with the law and swiftly disclose to me the remainder of the ex parte communications, which is to say the other messages in this email thread. They refuse.
- i. In an ironic turn, Ms. Mason even rebuked me for engaging in ex parte communications by asking her to disclose her own ex parte communications on behalf of Judge Johnson.
- j. I raised this email as evidence of ongoing ex parte communication to Judge Link on January 6, 2021 when he ruled on my Motion for Substitution of Judge for Cause (Exhibit L SOJ). Mr. Bender and Mr. Wehrman were both in attendance. In fact, both had, without providing any form of written response or evidence opposing my motion for a substitution of judge, interjected into the proceedings their musings and comments upon the case.
- k. At no point did Mr. Wehrman present an argument as to why a substitution of judge would be inappropriate or harmful to his client, which would be an understandable reason for his input on the proceeding. Rather, he sought to argue why I deserved to be abused by the court due to vague inferences about my character.
- l. During one of Mr. Wehrman's monologues he stated affirmatively that no ex parte communications had occurred in this case and that I had been given access to all ex parte communications. He also stated to the court that I do not know what ex parte communication is.

- m. When I asked on two occasions during this hearing that Judge Link swear in Mr. Bender and Mr. Wehrman so that they might testify under oath as witnesses to the email from Dr. Palen, Judge Link ignored me.
 - n. I wished, and still wish, for Mr. Bender and Mr. Wehrman to explain the email “I want to be paid” and to disclose the remainder of the conversation, as unambiguously required by law in the event Ex Parte communication takes place.
 - o. Alternately, though I don’t find it plausible, if there were no other messages in this thread and it were true that as Mr. Wehrman said, “No ex parte communication happened” he ought to have no issue affirmatively stating this under oath.
 - p. At issue is not Judge Link’s ruling, though by denying my motion for substitution of judge he acted contrary to law and fact, but rather his active participation in hiding ongoing ex parte communication. Namely, by allowing Mr. Wehrman to “argue” that no ex parte communication occurred, and seemingly to consider this “argument” in his ruling, but simultaneously refusing to have Mr. Wehrman, as witness and participant, swear under oath to these facts, it’s clear that Judge Link prioritized protecting his colleagues’ reputation over the interest of justice.
 - q. By not allowing a full hearing of the facts or ordering the parties to disclose all ex parte communications, as is required by law, Judge Link demonstrated that it is impossible for me to have a fair hearing in the present venue and furthered my claims raised herein.
45. I believe the average person apprised of the facts of this case would agree that these facts are very embarrassing to the Domestic Relations Division of the Circuit Court of Chicago.
46. Embarrassment is not a legal basis to ignore my Civil Rights or the needs of myself and my children and to hide serious misconduct.

47. Deference ought to be given to the litigant where the misdeeds of even one individual appear to have so muddied the waters of justice. Where there appears to be conflict between disclosing an act that would embarrass a friend and following the law, the law is to prevail. Litigants must not be exploited because individuals have elected not to recuse themselves.
48. Since my fundamental rights are not being recognized in the Domestic Relations Division of the Circuit Court of Chicago, immediate transfer is necessary.
49. Further, I have come to observe that appeals are almost impossible for litigants in the Domestic Relations Division of the Circuit Court of Chicago due to aggressive actions by individuals in the division to block my legal right to appeal. Namely, on more than five occasions, I have had employees of the court provide legal advice that is erroneous and intended to curb my furtherance of an appeal. (Exhibit U Who are you?, Exhibit V Refusal of clerks to certify copies, Exhibit X Bystander Report)
 - a. In order to submit a Bystander Report for entry into the official record, a litigant must file a motion and have that Bystander Report reviewed by the judge who issued the ruling under appeal. In this case, notice of appeal has been filed and served on Judge Matthew Link
 - b. On Friday, January 21, 2022 I wrote to the email address from which I had previously received scheduling communications, asking to schedule a trial.
 - c. An anonymous individual, presumably the individual named Roxanne named as scheduler on Judge Link's zoom hearings, wrote back to me that there are no hearings, that all matters are before Judge Johnson. I pointed out to her that she ought not to give legal advice and I repeatedly asked her to give her name and contact information. She did not give her name or contact information.

- d. Further, the clerks refused to certify my Bystander Report, Motion for hearing on Bystander Report and notification of service for Bystander Report three times. Each time they provided the erroneous instruction, "This is for appellate court".
- e. This is troubling for three reasons. First, this individual gave unsolicited legal advice. Second, the advice was erroneous. Third, the message was anonymous to the reader
- f. On January 25th, 2022 I apprised Ms. Brianna Steger, attorney for the court, of this situation.
- g. Ms. Steger wrote back that she could not provide legal advice.
- h. I again wrote to Ms. Steger and clarified that I was not seeking legal advice but rather, in her role as an attorney for the Court, apprising her of ongoing acts that may be the basis of future litigation against the court.
- i. Shortly thereafter my previously rejected pleadings were accepted without comment.
- j. I would eventually attend a status call with Judge Link at which time he verbally instructed me to ask Judge Johnson to transfer the case back to his calendar.
- k. I was forced to file my documents three times, to write no less than ten emails, to verbally speak to a judge and to specifically state to counsel for the court my basis for legal action in order to get part of one tiny part of the appeals process accomplished.

50. It is simply not acceptable that a litigant should have to go through such effort to access her legal right to have her case heard by an Appellate court. Such chilling practices effectively eliminate my legally protected right of appeal.

51. Without the ability to trust that proceedings are appealable and subject to oversight by higher courts, there can be no faith in the justice system. Because of the lack of my ability to trust in the Appeals Process, I must be granted a change of venue.

52. The use of intimidation and misinformation to curb my pursuit of an appeal is only one example of the ways in which I have been prevented by officers and employees of the court to access justice. On at least five occasions I have been denied the right to be informed about and appear at my own trials.
- a. This includes the three court appearances hidden from me by Mr. Trowbridge and his associates referenced above and the recent fraudulent claim by Mr. Wehrman that I was served notice of a new motion on February 8, 2022.
 - b. Another instance occurred on December 3, 2018(Exhibit L SOJ) when I was found in contempt by default when Mr. Wehrman presented a PRTSC before Judge Johnson before I received notice. Although Mr. Wehrman used email to inform me of the in absentia contempt finding, he had mailed the original notice of hearing using standard mail with an obstructed metered stamp (clear tape was placed over the barcode for the postage) and it was only after coming home from work the day of the hearing that I learned of the allegation.
53. The denial of a litigant's right to attend her own hearing, or to be informed about her own hearing, is abhorrent and not in keeping with democratic principles. To have occurred five times in one case defies probability and is clear evidence of brazen lawlessness in my treatment in this division. Transfer to a new venue in the interest of justice is necessary and appropriate.

Whistleblower Protections Needed and Gender Discrimination

54. I am currently in the process of filing a report of gender discrimination with the Civil Rights Division of the Department of Justice as well as filing a complaint in federal Court for a multitude of Civil Rights Violations. In both proceedings the Circuit Court of Chicago and

the Clerk of the Circuit Court of Chicago are named as the public institutions responsible for my civil rights violations.

55. Just within this Motion there are a number of obvious claims of civil rights violations which make such claims obviously warranted and worthy of serious attention. Other events involved these parties but occurred while my case was presided over by now disgraced Judge Raul Vega.
56. Numerous individuals employed within the Domestic Relations Division of the Circuit Court of Chicago may be called as witnesses or named as participants in discriminatory acts, and therefore a new venue is essential.
57. I am entitled to protection from retaliation as a whistleblower under federal law as someone who has reported Civil Rights violations and discrimination in a public facility. A swift transfer to a new venue is critical because I have already been specifically targeted as a whistleblower.
58. On February 7, 2022 the court appointed Custody Evaluator, Dr. Gerald Blechman, selected by Michael Bender, submitted a document he called a preliminary report of his investigation.
 - a. Dr. Blechman has interviewed me and my children for more than four hours.
 - b. Dr. Blechman has been given consent to speak to the children's doctors, therapists and teachers.
 - c. Dr. Blechman has reviewed all the pleadings that present evidence of Mr. Matt's concerning behavior, the PRTSCS RE Harassment, Failure to provide childcare and strange adults in the children's home. I have personally given him the documents twice. First I gave him a large colored binder with tabs dividing the pleadings and exhibits. Dr.

Blechman reported to me that he did not recall receiving it. I then mailed the documents via tracked parcel using Fedex and Dr. Blechman confirmed receipt.

- d. Dr. Blechman has administered three psychological evaluations of me:
 - i. On September 24, 2021 Dr. Blechman administered the MMPI-2 or Minnesota Multiphasic Personality Inventory -2 (MMPI-2) on me as part of his Custody Evaluation, using test form number 348278 in his office in Wheaton, Illinois.
 - ii. On Sept 24, 2021 Dr. Blechman administered the Millon Clinical Multiaxial Inventory - III (MCM I-III) using test form number 1130499 in his office in Wheaton, Illinois.
 - iii. On this date Dr. Blechman told me he had administered the same psychological evaluations to Mr. Matt.
 - iv. Around October 17th, 2021 I received a test form in the mail for the SCL-90-R Symptom Checklist-90-R with the product number 51417. I completed and returned this form to Dr. Blechman via US mail on October 17th, 2021.
- e. However Dr. Blechman's preliminary report contained no visit notes, no evaluation findings, no test results, no documentary evidence and no input from credible third parties, such as doctors, teachers and police, which had been presented repeatedly to Dr. Blechman by myself.
- f. Dr. Blechman's preliminary "report" consists exclusively of pasting an incoherent screed from Mr. Matt received via email, according to Dr. Blechman's letter.
- g. Among Mr. Matt's grievances listed - and apparently also Dr. Blechman's professional opinion as Dr. Blechman submitted this letter as official finding - were inferences about my own mental well being, Mr. Matt wrote of me and Dr. Blechman entered into the record:

"During the hearing I was a little frightened to hear how her mind works these days. She was saying things like: "...you know, first of all, I love democracy. And January 6, 2020 (sic), I saw people storming the Capital (sic). So, I feel spiritually

and emotionally called to protect democracy, And my understanding of a judge's role in an American courtroom is that it is a sacred duty to uphold the judicial process in that court And so, Mr. Trowbridge's (her former lawyer) malfeasance only matters here because Judge Johnson, Mr. Wehrman, and Mr. Bender observed it over the course of four months, and did nothing to intervene."

- h. First, I would like to state the obvious. Dr. Blechman, after 8 months of "evaluating" me, presented a two page letter addressed to Judge Johnson in which he just happened to find it necessary to make Judge Johnson aware that I have complained about my civil rights abuses by Judge Johnson himself. It seems curious to me that of all the factors that influence my children's well being, it stood out as Dr. Blechman as critical to highlight my whistleblower activity.
 - i. In my nine years of employment with children, often with impoverished children from challenging home environments, I can assure this Court I never observed a social worker, DCFS worker, teacher, therapist, guardian ad litem or other authority feel that an analysis of a parent's political beliefs. or her disclosure of her willingness to speak truth to power entered into evaluation of an individual's parenting abilities.
 - j. As it happens I do believe that a judge's role is sacred. I am a woman of faith and I do believe that God wishes for me, and all others, to act in the furtherance of truth and justice. My faith and my political beliefs ought never to be entered into the record as "proof" of my mental unfitness, particularly where an actual investigation was conducted as to my mental fitness and set aside to be replaced by deranged hearsay.
59. Where my faith drives me to pursue Civil Rights Actions, to speak truthfully in the furtherance of justice, to call upon my community to stand witness to Civil Rights Abuses I am protected by the laws of this nation and this state. I am demanding these protections now.

60. The need for a new venue is obvious given that my advocacy for justice on behalf of myself and other litigants in the Domestic Relations Division of the Circuit Court of Chicago is already being unjustly raised as evidence of my parental unfitness and flagged to the very people empowered to do me and my children harm.

WHEREFORE, I, Megan Mason (formerly known as Megan Matt), request that this Court enter an Order:

- A. Immediately transferring this case to adjoining Lake County;
- B. Waiving the right to tax fees to myself related to this transfer;
- C. Overturning all rulings subsequent to the appointment of Michael Bender as Guardian Ad Litem on June 6, 2019;
- D. Staying all proceedings and pending proceedings until this case is brought before a judge in Lake County;
- E. Immediately terminating Michael Bender's appointment as GAL;
- F. Immediately terminating Gerald Blechman's appointment as Custody Evaluator;
- G. For such further relief as this court deems appropriate.

Respectfully Submitted By

By: 
Megan Mason, Pro Se Respondent

Megan Mason
419 Greenleaf Ave.
Wilmette, IL 60091