

(I served this Motion to Dismiss on parties on March 18, 2022 and submitted the filings to Odyssey File on that same date. I am unable to find a stamped copy at this time and Odyssey File has been down for unnamed reasons for several hours.

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

IN RE THE FORMER MARRIAGE OF:)	
)	
PETER MATT,)	
)	
<i>Petitioner,</i>)	Case No. 2016 D 009534
)	
and)	
)	
MEGAN MATT,)	
n/k/a MEGAN MASON,)	
)	
<i>Respondent.</i>)	

MOTION TO DISMISS PRTSC RECEIVED BY PETER MATT ON FEBRUARY 28th, 2022

On March 18th, 2022, at a previously scheduled Zoom status hearing before Judge Robert Johnson in the Circuit Court of Chicago, I intend to present this Motion to dismiss Peter Matt's PRTSC filed in the Circuit Court of Chicago on February 8th, 2022 and finally served upon me by Mr. Matt, Petitioner, via his attorney, Christopher Wherman, after two requests, on February 28th, 2022.

I have also previously provided an answer to the PRTSC, filed March 16th, 2022, in which I denied substantive claims. I am moving to have the PRTSC dismissed because it is substantially insufficient in law. In support thereof I state as follows:

1. (735 ILCS 5/2-615) (from Ch. 110, par. 2-615)

Sec. 2-615. Motions with respect to pleadings. (a) All objections to pleadings shall be raised by motion. The motion shall point out specifically the defects complained of, and shall ask for appropriate relief, such as: that a pleading or portion thereof be stricken because substantially insufficient in law, or that the action be dismissed, or that a pleading be made more definite and certain in a specified particular, or that designated immaterial matter be stricken out, or that necessary parties be added, or that designated misjoined parties be dismissed, and so forth.

(b) If a pleading or a division thereof is objected to by a motion to dismiss or for judgment or to strike out the pleading, because it is substantially insufficient in law, the motion must specify wherein the pleading or division thereof is insufficient.


(c) Upon motions based upon defects in pleadings, substantial defects in prior pleadings may be considered.

(d) After rulings on motions, the court may enter appropriate orders either to permit or require pleading over or amending or to terminate the litigation in whole or in part.

(e) Any party may seasonably move for judgment on the pleadings.

(Source: P.A. 82-280.)

2. Mr. Matt's Petition for Rule to Show Cause received February 28th, 2022 is substantially insufficient in law because it alleges that I am in contempt of Court Order but fails to prove that I am in contempt of Court Order. Namely, the Petition alleges that I have refused to comply with a Court Order that "ABA Shall Continue" by 1. Stopping ABA Therapy for our minor son, A [REDACTED], and 2. Interfering with Mr. Matt's use of ABA therapy. This is false and unsupported by fact.
3. In fact, Mr. Matt cynically filed this Petition with the full understanding that I was attempting to find providers for our son in a time of very short staffing across all industries, particularly behavioral health care.
 - a. I was informed in writing by A [REDACTED] prior ABA provider in August of 2021 that they could not support A [REDACTED] due to staff shortages. At that time we considered two agencies, one of which was PBS, one was Josh Ebers. Although PBS is a larger and established, in network agency, Mr. Matt insisted on using Josh Ebers as the provider. (Exhibit C)
 - b. During this period, late summer 2021, my attorney attempted to get Mr. Matt's attorney, Mr. Wehrman, to provide input on the provider decision but her emails and calls were unanswered.
 - c. On December 21, 2021, I wrote to Mr. Matt on the Talking Parents messaging app, "Josh has told me he's having a hard time hiring a vaccinated provider. Would you be ok with me talking to other agencies for 2022?" and further in the conversation, "I have not revoked consent. Josh is interviewing and I'll look as well." (Exhibit A)
 - d. On January 25th, 2022, I was specifically told by the ABA supervisor at the time, Josh Ebert, "Megan, Hi, I am still having a difficult time finding a therapist as there is a workforce shortage. It might be best to search multiple agencies to save time." (Exhibit B)

- e. In fact staff shortages have been an issue with this provider I have engaged another provider, PBS, despite strong interference by Mr. Matt. On March 8, 2022, I was informed during a telephon call with Chrstine Bass, the PBS intake coordinator, that she was fearful of Mr. Matt allowing intake but then cancelling services as he had done in the past. I had to persuade her to give Mr. Matt another chance.
 - f. Mr. Matt finally agreed to intake with PBS who have assured me they already have two therapists available.
4. Because ABA therapy is continuing, the claim is on the face of it baseless.
5. Mr. Matt's Pettion for Rule to Show Cause received February 28th, 2022 is substantially insufficient in law because it is part of a pattern of misconduct by Mr. Wehrman whereby, on five previous occasions, he has sought and succeeded in having hearings and appearances scheduled without my awareness. It is therefore not a legal action but part of a pattern of denial of due process.
- a. On March 8, 2022, Mr. Wehrman filed in this court a notice of filing claiming that he served me the PRTSC via email at 
 - b. Mr. Wehrman did not serve me until I learned of the filings in the Docket, finally sending an amended notice of filing on February 28th, 2022.
 - c. Further, Mr. Wehrman was seeking to have a hearing held in my absence. His client has known since December, 2021 that I would be in Mexico between February 19 and February 28th, 2022.
 - d. Mr. Wehrman and his associates nevertheless tried to schedule an appearance on February 22, 2022.
 - e. Evasion of legal proceedings, not enforcement of law is the goal of this PRTSC.
6. Mr. Matt's Petition for Rule to Show Cause received February 28th, 2022 is substantially insufficient in law because it seeks to modify a parenting plan entered in this court in 2017 without basis and with a seeming desire to avoid transparent litigation. In other words, Mr. Matt is seeking an illegal revocation of my parental rights.
7. Mr. Matt's Petition for Rule to Show Cause received February 28th, 2022 is substantially insufficient in law because it is based on evidence inadmissible in a

court of law. Namely, the PRTSC received February 28th, 2022, includes a letter from Dr. Gerald Blechman, custody evaluator, as a vehicle for hearsay and deceit. Although Dr. Blechman has invoiced and received payment from Mr. Matt and myself for services identified as a Custody Evaluation process, he pasted an unhinged rant from Mr. Matt in a letter to this Court and called it a “preliminary report”.

- a. There is a long well documented history of fraud, deceit and abuse of power by officers of the court and court appointees involved in this case which makes all actions by court appointees subject to extra scrutiny.
 - b. I allege that this is an effort by Dr. Blechman to avoid ever submitting a report to this Court because of his profound bias toward Mr. Matt. Specifically, Mr. Matt is so obviously and objectively impaired in his abilities to parent, to make decisions and to act ethically that it is impossible that Dr. Blechman could prepare a report based on facts such as documentary evidence, psychological assessments and visit notes that suggests Mr. Matt is capable of decent parental decision making or care.
 - c. However, should Dr. Blechman purjor himself or exercise ethical misconduct, for example by conducting psychological assessments of the parties and then hiding these assessments from the Court, he would jeopardize his license as a psychologist in the state of illinois.
 - d. Dr. Blechman agreed to serve as a Custody Evaluator for this Court and pasting hearsay from Mr. Matt is not part of his duties. This impropriety negates any “authority” such a letter would normally confer.
 - e. Specifically, I allege that Dr. Blechamn is seeking to avoid revealing the findings of three psychological assessments conducted on Mr. Matt in the summer of 2021.
 - f. Further, I allege that Dr. Blechman is seeking to avoid disclosing reports of child abuse by Mr. Matt raised by the children's doctors on repeated occasions.
 - g. Should it be revealed that Dr. Blechman, along with Mr. Michael Bender, hid credible reports of abuse and child endangerment, both parties' reputations would suffer.
8. At present there are a number of concurrent matters under appeal or investigation by federal authorities which makes the involvement of certain individuals in this case inappropriate. There continued involvement renders a legally enforceable ruling in this court almost impossible (Exhibit D Petition o Transfer Venue in the Interest of Justice). Specifically:

- a. Mr. Bender, as Guardian Ad Litem, and Mr. Wherman, as opposing counsel, are also witness to a documented solicitation of a bribe by a public official during the course of his appointed duties on December 5th, 2020 by Dr. John Palen, a court appointed parenting coordinator and close colleague of Mr. Bender who Mr. Bender personally asked to be appointed. *id*
 - b. Ms. Kaye Mason, an employee of the clerk and scheduler in this appearance has witnessed the same.*id*
 - c. Mr. Bender has hidden allegations of domestic violence by Mr. Matt including reports by credible third parties such as doctors, police and clergy.*id*
 - d. Mr. Bender and Mr. Wehrman have both hidden criminal tax fraud and money laundering by Mr. Matt.*id*
9. Mr. Bender, Mr. Wehrman, and Ms. Kaye Mason ought to have recused themselves long ago due to these conflicts and their continued involvement makes a legally enforceable ruling in this court almost impossible. Immediate dismissal of the PRTSC is necessary for this reason alone.
10. These shenanigans by Mr. Matt are expensive and exhausting to me and such antics threaten my career due to the time and stress caused by nuisance litigation.

Wherefore I ask that this Court:

1. Deny Mr. Matt's Petition for Rule to Show Cause received February 28th, 2022.
2. Replace Ms. Kaye Mason with a clerk who is unrelated to any instances of past misconduct.
3. Order Mr. Bender to immediately recuse himself and tender to parties any fees paid to him previously.
4. Order Mr. Wehrman to immediately recuse himself.
5. Demand that Dr. Blechman provide a full report to this Court based on actual psychological work and not hearsay, specifically:
 - a. Dr. Blechman be available to testify under oath;

- b. Dr. Blechman be ordered to provide session notes, assessment results and other documentary evidence for which parties have been billed.
6. Demand that Mr. Matt pay me \$2,000 for my part of Dr. Blechman's Custody Evaluation fees due to Mr. Matt's interference and harassment of the process.

Respectfully Submitted to this Court by:

A handwritten signature in black ink that reads "Megan Mason". The signature is written in a cursive, flowing style.

Megan Mason, Pro Se Respondent formerly known as Megan Matt

EXHIBIT A TALKING PARENTS NEW PROVIDER

Subject: ABA

Exhibit A



Megan Mason

12/21/2021 11:06 AM

Peter, Josh has told me he's having a hard time hiring a vaccinated provider. Would you be ok with me talking to other agencies for 2022? It's not acceptable to have an unvaccinated therapist in either of our homes. I don't know if Josh asked you for permission but I was not informed and could have seriously jeopardized my loved ones. This is not ok.

I know you are a vexatious litigant and will try to use this as a means to harass and abuse me with our next judge. You do as you wish. But I have every right to insist that people working with our children are safe for our family and the community.

At the same time I'm happy to look for a provider who respects family safety, science and can provide ABA during agreed upon times.

Peter Matt viewed this subject.12/21/2021 11:13 AM



Peter Matt

12/21/2021 11:18 AM

if yiu remove your consent to josh, the current aba provider, i will have a problem. if you want to look for another provider in parallel or ask josh to find another therapist in paralell, i have no issue. we can then decide when you have one. please let me know today what you want to do.

Megan Mason viewed this subject.12/22/2021 2:56 PM



Megan Mason

12/22/2021 2:58 PM

i have not revoked consent. Josh is interviewing and I'll look as well.



Megan M <megan42@gmail.com>

Therapist update?

Yehoshua Ebert <jebert@atherapysolutions.com>
To: Megan Mason <[REDACTED]>

Tue, Jan 25, 2022 at 12:42 PM

Megan,

Hi, I am still having a difficult time finding a therapist as there is a workforce shortage. It might be best to search multiple agencies to save time.

Thanks,
Josh

[Quoted text hidden]

--

Joshua Ebert, MA, BCBA (Board Certified Behavior Analyst)
Autism Therapy Solutions Inc.

[7300 N. Cicero Ave.](#)

[Unit 202](#)

[Lincolnwood, IL 60712](#)

C: (773) 655-0690

F: (773) 336-7601

www.atherapysolutions.com

This is intended as a confidential email. If you are not the intended recipient, please do not disseminate or copy, and notify the sender immediately.

EXHIBIT C

EXHIBIT C FIRST PBS DISCUSSION

☰ View Message

Megan Mason viewed this subject.7/6/2021 9:38 AM



Megan Mason

8/9/2021 10:46 AM

Peter, PBS is available to start onboarding. I texted Josh to check status, hopefully he gets approved this week. I think we should start PBS onboarding. Do you agree?

I know my attorney asked Chris multiple times if you had another provider you would like to use but I don't believe we received a response. I assume you still don't have a provider preference?

Peter Matt viewed this subject.8/9/2021 10:53 AM



Megan Mason

8/19/2021 10:01 AM

Hi Peter, PBS is ready to start intake. It sounds like Josh is really close to getting approval but I think it makes sense to get started with PBS just in case. Please let me know if you are ok with this. Did you have any other providers?

Thanks,
Megan

Peter Matt viewed this subject.8/19/2021 10:58 AM



Peter Matt

8/19/2021 11:00 AM

you can start intake with various providers and insurance will pay. It doesn't hurt. Just we can only have one provider do therapy at the end.

STATE OF ILLINOIS, CIRCUIT COURT _____ COUNTY	PROOF OF DELIVERY	<i>For Court Use Only</i>
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the person or company that filed this case as Plaintiff/Petitioner. Enter the name of the Defendants/ Respondents. Enter the Case Number given by the Circuit Clerk.	_____ Plaintiff / Petitioner <i>(First, middle, last name or Company)</i> v. _____ Defendants / Respondents <i>(First, middle, last name, or business name)</i>	_____ Case Number

In **1**, enter the name of each court document you are sending.

In **1a**, enter the name, mailing address, and email address of the party you are sending the document to. If they have a lawyer, you **must** enter the lawyer's information.

In **1b**, check the box to show how you are sending the document. **CAUTION:** If you and the person you are sending the document to have an email address, you **must** use one of the first two options. Otherwise, you may use one of the other options.

In **c**, fill in the date and time that you are sending the document.

1. I am sending the following court document: _____

a. To: _____

Name: _____

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Address: _____

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b. By:

- An approved electronic filing service provider (EFSP)
- Email *(not through an EFSP)*

Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.

- Personal hand delivery to:
 - The party
 - The party's family member who is 13 or older, at the party's residence
 - The party's lawyer
 - The party's lawyer's office
- Mail or third-party carrier

c. On: _____ at: _____ a.m. p.m.

Date Time

In **2**, if you are sending the document to more than 1 party or lawyer, fill in **a**, **b**, and **c**. Otherwise leave **2** blank.

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If you are sending your document to more than 2 parties or lawyers, check the box and file the *Additional Proof of Delivery* with this form.

2. I am sending this document:

a. To:

Name: _____
First Middle Last

Address: _____
Street, Apt # City State ZIP

Email address: _____

b. By:

- An approved electronic filing service provider (EFSP)
 - Email (*not through an EFSP*)
- Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.*
- Personal hand delivery to:
 - The party
 - The party's family member who is 13 or older, at the party's residence
 - The party's lawyer
 - The party's lawyer's office
 - Mail or third-party carrier

c. On:

_____ at: _____ a.m. p.m.
Date Time

I have completed an *Additional Proof of Delivery* form.

Under the Code of Civil Procedure, [735 ILCS 5/1-109](#), making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete address, telephone number, and email address, if you have one.

I certify that everything in the *Proof of Delivery* is true and correct. I understand that a false statement on this form is perjury and has penalties provided by law under [735 ILCS 5/1-109](#).

 /s/
 Your Signature

 Print Your Name



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