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IN THE UNITED STATES DISTRICT COURT

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS

MEGAN MASON,
Plaintiff;

A.D.M., by his mother, Megan Mason,
Plaintiff;

T.M.M., by his mother, Megan Mason,
Plaintiff;

Vs.

THE CIRCUIT COURT OF COOK
COUNTY ILLINOIS, Defendant;

IRIS MARTINEZ, personally and as Clerk for
the Circuit court of Cook County, December
1, 2020 to the present,
Defendant;

DOROTHY A. BROWN, as Clerk for the
Circuit court of Cook County December 1,
2000–December 1, 2020
Defendant;

TIMOTHY EVANS, as Chief Judge for the
Circuit Court of Cook County,
Defendant:

GRACE DICKLER, personally and as
Presiding Judge for the Domestic Relations
Division of the Circuit Court of Cook County,
Defendant;

ROBERT JOHNSON, personally and as
Associate Judge for the Domestic Relations
Division of the Circuit Court of Cook County,
Defendant;

MICHAEL BENDER, personally and as

Case Number: 1:22-CV-2315

FILED DATE: 7/1/2022 3:29 PM 2016D009534

Exhibit F

Guardian Ad Litem for the Domestic relations
Division of the Circuit Court of Cook County,
Defendant;

DR. JOHN PALEN, personally and as
Parenting Coordinator for the Domestic
Relations Division of the Circuit Court of
Cook County,
Defendant;

DR. GERALD BLECHMAN, personally and
as Custody Evaluator for the Circuit Court of
Cook County,
Defendant;

BRADLEY TROWBRIDGE, personally,
Defendant;

CHRISTOPHER WEHRMAN, personally,
Defendant;

KAYE MASON, personally and as an
employee of the Circuit Court of Cook
County, Defendant;

LAURIE GARNER, employee of the Clerk of
the Circuit Court of Cook County,
Defendant;

STEVEN KLEIN, personally, Defendant;

MATTHEW LINK, personally and as a judge
for the Circuit Court of Cook County.

TRIAL BY JURY IS REQUESTED

EXPEDITED HEARING IS REQUESTED

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AMENDED COMPLAINT AND REQUEST FOR INJUNCTION

I am the pro se plaintiff in this matter and mother to A.D.M. and T.M.M., minor children who are plaintiffs in this suit by me. I present this amended complaint and pray for expedited trial due to the serious impact on the health and safety of minor crime and the disclosure of criminal acts made by me herein.

Note about amendment: Some amendments have been made to the Complaint filed in this court on May 3rd, 2022 and which I delivered to all defendants on or around May 19th, 2022 along with a postage paid self addressed envelope and a waiver of service form. As of this filing, June 20th, 2022, no Defendant named has returned a waiver of service form. It is my understanding that, for the purpose of calculating time under the Federal Rules of Civil Procedure, the parties will then be served on the date they receive the summons, complaint and other necessary documents, which I believe will have occurred between June 21 and 23 and therefore my amendment is allowable as a matter of course, falling within 21 days of service as defined by law. Two parties, Steven Klein and Matthew Link and so the amendment will fall within 21 days of service.

If I were asked by this Court to provide a basis for amendment, as required in other instances, I would enumerate many ways in which I have learned new information, often simply learning the law or application of the law, which makes an amendment appropriate. In this instance, I also quite simply wished to correct typographical and other petty errors to make the complaint more coherent out of respect for the time and resources of all parties, including the Court itself. I believe however that this can be amended as a matter of course.

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I. OVERVIEW

1. All claims in this case relate to abusive practices in the Domestic Relations Division and offices of the Clerk of the Domestic Relations Division of the Circuit Court of Cook County, Illinois, toward myself, Plaintiff Megan Mason acting Pro Se, and my minor children, A.D.M. and T.M.M. Although I and my ex husband Peter Matt were legally divorced and entered into a mutually agreed upon Allocation Judgment Parenting Plan on September 27th, 2017, I have since that time been enmeshed in abusive litigation by Peter Matt and Defendants through the unique exploitative customs of the Domestic Relations Division of the Circuit Court of Cook County under the direction and leadership of Presiding Judge Grace Dickler.
2. What is at issue to raise federal questions is not, however the divorce case, or the “game” being played in the arena, but rather violations of civil rights by and within a State of Illinois Circuit Court and the offices of a Circuit Court Clerk, which is to say individuals setting fire to the arena where the game is being played. I am an honest, measured, decent woman. I am not trying to inappropriately retry a divorce case. I do not believe in retaliation but I do believe in justice and protection for the vulnerable. I am seeking to be made whole and for my children to be made whole under federal law and judicial authority for profound cruelty inflicted and damages caused by the defendants in this case.

II. BASIS FOR JURISDICTION

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3. This court has jurisdiction under **28 U.S.C. § 1331**, a case arising under the United States Constitution or federal laws or treaties is a federal question case. All events described here took place in Cook County Illinois so the Northern District is the appropriate venue.
4. Under **28 U.S. Code § 1367** this court also has authority to consider state laws and rules where such rules are intertwined with the federal question raised as is the case with the issues raised here.

III. LAWS

3. This Complaint and request for injunctive relief is based on violations of the following federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case:

The 1st and 14th Amendments of the United States Constitution

Americans With Disabilities Act of 1990, Pub. L. No. 101-336, 104 Stat. 328 (1990).

42 U.S. Code § 1983

28 U.S. Code § 1331

18 U.S. Code § 1001

18 U.S. Code § 1512

18 U.S. Code § 1513

18 U.S. Code § 1956

18 U.S. Code § 1028A

18 U.S. Code § 1343

18 U.S. Code Chapter 96: § 1961, § 1962, § 1964, § 1965, § 1966, § 1967, § 1968

4. Under **28 U.S. Code § 1367** the following state and local rules are intertwined with the matters of this case:

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750 ILCS

ILLINOIS CODE OF JUDICIAL CONDUCT, ILL. S. CT. R. 61-68, ILL. REV. STAT. ch 1 10A, paras. 61-68 (1989)

(720 ILCS 5/31-3) (from Ch. 38, par. 31-3)

IV. PARTIES

5. I, Megan Mason, am the pro se Plaintiff in this Complaint and mother to A.D.M., age thirteen, and T.M.M., age ten, both also Plaintiffs. I reside in the village of Wilmette in Cook County, Illinois. I am a dual licensed registered investment advisor/FINRA registered broker employed as a Vice President of Wealth Management by Jefferies Financial Group based in New York, New York.
6. A.D.M. is a minor child, aged thirteen, who resides in the village of Wilmette in Cook County, Illinois. A.D.M. has various intellectual, motor and developmental disabilities and is several years behind grade level in terms of academic ability, spending the majority of his school day in intensive, specialized education classes. A.D.M.'s doctors, parents, therapists, family and friends anticipate that A.D.M. will remain dependent on the direct care and support of a guardian after the age of eighteen.
7. T.M.M. is a minor child, aged ten, who resides in Wilmette, Illinois in Cook County, Illinois.
8. The Circuit Court of Cook County is a metropolitan court system with multiple facilities and divisions. The claims here relate to the specific unique customs and practices of the Domestic Relations Division of the Circuit Court of Cook County under the

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administrative leadership and executive decision making of Presiding Judge Grace Dickler and Timothy Evans, also named.

9. Upon information and belief, Defendant Iris Martinez is a citizen of the United States and a resident of Cook County, Illinois. She is sued in her individual capacity. From December 1, 2020, Ms. Martinez has been Clerk for the Circuit Court of Cook County.
10. Upon information and belief, Defendant Dorothy A. Brown is a citizen of the United States and a resident of Cook County, Illinois. She is sued in her individual capacity. From December 1, 2000 to December 1, 2020, Ms. Brown was Clerk for the Circuit Court of Cook County.
11. Upon information and belief, Defendant Timothy Evans is a citizen of the United States and a resident of Cook County, Illinois. He is sued in his individual capacity. At all times mentioned in this case Mr. Evans was Chief Judge for the Circuit Court of Cook County with ultimate authority over the Domestic Relations Division of the Circuit Court of Cook County.
12. Upon information and belief, Defendant Grace Dickler is a citizen of The United States and resident of Cook County, Illinois. She is sued in her individual capacity and as chief administrator and executive supervisor to Guardian Ad Litem, Parenting Coordinators, Custody Evaluators, Judges, judicial clerks and other appointees and all other employees of the Domestic Relations Division of the Circuit Court of Cook County not explicitly under the authority of Clerk Iris Martinez.
13. Upon information and belief Defendant Robert Johnson is a citizen of the United States and a resident of Cook County, Illinois under the authority of Presiding Judge Grace Dickler. He is sued in his individual capacity. Judge Johnson has been the presiding

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trial judge in the matters raised in this complaint from August 13, 2018 to present.

14. Upon information and belief Defendant Michael Bender is a citizen of the United States and a resident of Cook County, Illinois. He is sued personally and as Guardian Ad Litem for the Domestic Relations Division of the Circuit Court of Chicago under the authority of Presiding Judge Grace Dickler. Mr. Bender is a former Circuit Court Judge who has been appointed in the capacity of Guardian Ad Litem to A.D.M. and T.M.M. from June 6, 2019 to present.
15. Upon information and belief, Defendant Dr. John Palen is a citizen of the United States and a resident of Cook County, Illinois. He is sued personally and as Parenting Coordinator for the Domestic Relations Division of the Circuit Court of Chicago under the authority of Presiding Judge Grace Dickler. Dr. Palen is a psychiatrist who was appointed in the capacity of Parenting Coordinator between August 28, 2020 and May 25, 2021.
16. Upon information and belief, Defendant Dr. Gerald Blechman is a citizen of the United States and a resident of DuPage County, Illinois. He is sued personally and as Custody Evaluator for the Domestic Relations Division of the Circuit Court of Cook County, under the authority of Presiding Judge Grace Dickler. Dr. Blechman is a psychologist who has been appointed in the capacity of Custody Evaluator to A.D.M. and T.M.M. from May 25, 2021 to present.
17. Upon information and belief, Defendant Bradley Trowbridge is a citizen of the United States and a resident of Cook County, Illinois. He is sued personally. Mr. Trowbridge is a member of the Illinois bar as well as a court appointed child advocate, under the authority of presiding Judge Grace Dickler, through his business Safe Travels LLC. I

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issued payment to Mr. Trowbridge and signed a retainer agreement on June 11, 2019.

Mr. Trowbridge filed an appearance as my attorney on July 5, 2019 and withdrew as my attorney on October 2, 2020.

18. Upon information and belief, Defendant Christopher Wherman is a citizen of the United States and a resident of Cook County, Illinois. He is sued personally. Mr. Wehrman is a member of the Illinois bar and has served as the attorney for my ex husband, Peter Matt, from the fall of 2016 to present.
19. Upon information and belief Defendant Kaye Mason is a citizen of the United States and a resident of Cook County, Illinois. She is sued personally and as a clerk employed by the Circuit Court of Cook County, Illinois.
20. Upon information and belief Defendant Laurie Garner is a citizen of The United States and a resident of Cook County, Illinois. She is sued personally and as a supervisor in the office of the Clerk of the Circuit Court of Cook County.
21. Upon information and belief Defendant Steven Klein is a citizen of the United States and a resident of Cook County, Illinois. Mr. Klein is a member of the Illinois Bar and has acted as Mr. Matt's attorney from the fall of 2016 to the present. Mr. Klein is also an approved Cook County Circuit Court Child Rep, reporting to Presiding Judge Grace Dickler in this capacity. He is sued personally.
22. Upon information and belief Defendant Matthew Link is a citizen of the United States and a resident of Cook County, Illinois. He is sued in his individual capacity and as an employee of the Circuit Court of Cook County under the authority of Presiding Judge Grace Dickler.

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V. FACTS

Background

23. The events and facts related to the RICO and Section 1983 claims raised in this complaint all relate to the divorce and parentage case 2016 D 9534 in the Domestic Relations Division of the Circuit Court of Cook County between Peter Matt, Petitioner and Megan Matt (nka Megan Mason) Respondent.
24. I am providing the basic facts related to some of the divorce matters that are six years old and seemingly resolved, only because they provide necessary context or are part of ongoing activity or relate to fraud, particularly financial misrepresentations, that continue to this date.
23. I initiated the divorce process in August, 2016 by removing myself and the children from the family home and starting a collaborative divorce process with Mr. Matt under the guidance of a social worker named Rosalind Sedaka. In October, 2016 Mr. Matt, via his attorneys Mr. Steven Klein and Mr. Christopher Wehrman, started the litigation of the divorce by filing a fraudulent emergency motion for a restraining order alleging that I had embezzled \$100,000 from the family businesses. This was shown to be untrue but all the family assets were nevertheless put into Receivership under Robert Handler, Receiver. At this first Court appearance I informed the Court in front of Mr. Matt's counsel, Steve Klein, partner at Mr. Wehrman's firm at the time, that I knew Mr. Matt to have at least \$1 million in accounts in Europe that he does not choose to report to the IRS. Mr. Matt has significant family wealth as

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well as ownership of some business and real estate assets acquired during our marriage.

Through Mr. Matt's own Circuit Court filings, submitted by the law firm Swanson Martin Bell, he has attested to owning three companies abroad: Goedecke Germany, Goedecke Poland and Goedecke India. Since I stopped involvement in his businesses in 2012 Mr. Matt has not reported any of the assets to the IRS because of his unique interpretation of federal tax laws. This has created a unique situation where one party in a divorce, and now five year parentage dispute is actually poor and the other presents himself as poor while having virtually unlimited support for his litigation. This situation has created an inherent bias toward me due to my inability to pay for attorneys.

25. Between October, 2016 and the parties' divorce in September, 2017, the parties' personal and business assets were ordered into Receivership under Robert Handler.

26. During this time and for the subsequent six years, Mr. Klein and Mr. Wehrman received payments from Wintrust bank account ending 8496 hich Mr. Matt used to transfer funds from his untaxed, unreported assets abroad to himself.

- a. Mr. Matt is a signer on this account and used it to knowingly launder moneys paid to Mr. Klein and Mr. Wehrman.
- b. Mr.s Klein and Wehrman knowingly participated in tax evasion and money laundering by receiving laundered funds and falsely stating to the court that the funds were from Mr. Matt's father.
- c. During this same period, I was forced to sell all my jewelry and my car in order to feed myself and my children while all marital assets were knowingly hidden by Mr. Matt with the assistance of Christopher Wehrmand and Steven Klein.

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27. Mr. Matt initiated this case in Chicago, an hour from our homes instead of the Skokie Courthouse, ten minutes from our homes, in order to access a court known to be friendly to men like himself.

28. Mr. Matt was financially abusive during our marriage, namely by insisting that assets be titled in my name so that he would not have to report an income and pay taxes and so that his business could have women owned business status. But Mr. Matt did not allow me to have money reported as earnings for our business, an S Corporation. Since he had to report all earnings as distributions and salary he paid taxes on earnings in my name but did not allow me the salary, so we called the funds retained earnings, then we called them shareholder loans. At the time of my separation there was \$300,000 in unpaid salary that had been reported as paid to me, taxed and titled as shareholder loans on the balance sheet.

29. Mr. Matt moved all actual assets and cash to his and his father's control in Europe years before our divorce. This is a primary reason I did not and could not seek child support, though I had been the primary caregiver to the children. On paper I had received a good income and it was reported as paid. I was also sole guarantor on \$600,000 in Mr. Matt's business loans for assets he had moved to businesses in Europe in his and his father's name by the time of our separation.

30. My goal in divorcing Mr. Matt was to escape contact with him, to be financially solvent and to be indemnified and protected from his crimes. However I have been enmeshed with Mr. Matt and the Domestic Relations Division of the Circuit Court of Cook County for five years since our divorce due to Mr. Matt's harassment, vexatious

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litigation, and now increasingly due to predatory actions by officers of the court described extensively and repeatedly herein.

31. A main form of abuse by Mr. Matt is continued financial abuse in the form of punitive expenses, which has contributed in part to my current bankruptcy and financial distress - direct financial sanctions, my own legal fees, and court ordered legal fees have also contributed. This has included tens of thousands of dollars in unnecessary expenses, primarily during the first years of my separation when I earned an average of \$49,000 per year and received no maintenance or support. Mr. Matt has, for example, purposely acquired an expensive private health insurance plan in order to incur an extra \$16,000 in costs to sue me, rather than using my significantly cheaper employer group insurance for the children. He has done this particular scheme twice.

29. Although no doctor has ever prescribed Applied Behavioral Analysis (ABA) therapy for our son who has developmental disabilities, Mr Matt has litigated extensively on this topic and it remains a basis of ongoing misconduct, including claims related to current violations of civil rights and acts of fraud. On one occasion two years after our divorce I did not have a car because I had sold it to pay rent and Mr. Matt drove me to an intake appointment with an ABA provider. They told us that the therapy would cost \$14,000. I could not pay this and stated this. Mr. Matt agreed to pay it in full and attested to as much in writing three times. He wrote specifically, "I will pay for all ABA costs". Then he sued me for half of the costs. Because I have been fearful of further such financial abuse I have at times had to inform providers I could not pay them, which has been depicted as me refusing medical care. I could not pay them. This has contributed to my bankruptcy.

Facts related to the Bender Syndicate

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31. On February 19th, 2019, with no wish to modify the parenting plan or related motions pending, with a duly enacted divorce and parenting plan already in place, Mr. Matt moved to have a Guardian Ad Litem assigned to our case in order to further his wish for prolonged contact, and to inflict financial harm on me.

32. The Illinois statute on Guardian Ad Litem ((750 ILCS 5/506) (from Ch. 40, par. 506), states that GALs: *In deciding whether to make an appointment of an attorney for the minor child, a guardian ad litem, or a child representative, the court shall consider the nature and adequacy of the evidence to be presented by the parties and the availability of other methods of obtaining information, including social service organizations and evaluations by mental health professions, as well as resources for payment..* Since there were no proceedings, no pleadings, it would have been impossible for the Court to determine the adequacy of the evidence. There was no evidence and no motion or petition to prove.

33. On June 6, 2019 Judge Johnson appointed his mentor and friend Michael Bender as Guardian Ad Litem to my children A.D.M. and T.M.M. against my opposition.

34. At the time of Mr. Bender's appointment I had been introduced to a family law attorney named Bradley Trowbridge through a referral from a Domestic Violence Advocacy group called Lifespan after my Mr. Matt had made threatening phone calls and emails to my church, Lake Street Church of Evanston. Because of the threats and erratic behavior by Mr. Matt, Lake Street's Head of Youth Programming, Jillian Westerfield, was concerned about my well being so she referred me to congregant Kathe Morris Hoffer, Executive Director of the Chicago Alliance Against Sexual Exploitation. Ms. Hoffer and I had a call and she was concerned about my history of domestic violence and lack of

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legal representation so she referred me to Lifespan, a nonprofit providing legal services to impoverished survivors of physical and sexual abuse . Because I did not qualify for their services, they in turn referred me to Mr. Trowbridge as a private attorney specializing in domestic violence.

35. During our first call Mr. Trowbridge informed me he was a former social worker and this added a deeper level of trust and disclosure than a normal attorney relationship. He said he specialized in victims like me. He knew that during this time I was also in treatment for PTSD with Farah Baig, addressing issues related to childhood and adult trauma. I have an ACE score of six. A specific focus of my treatment and issue for recovery was a tendency to become involved in exploitative relationships.

36. Although I had been pro se because of finances, when Mr. Bender was appointed I contacted Mr. Trowbridge and borrowed money to retain him to have Mr. Bender removed. However Mr. Trowbridge told me at our first meeting that he knew Mr. Bender and he was a good guy, that the best strategy for me would be to tell Mr. Bender I originally opposed his appointment but now I was happy to have him.

37. Mr. Trowbridge did not disclose any other business interests or conflicts though I now understand he is also a custody supervisor through his business Safe Travels LLC and wishes to become a judge. Mr. Bender can get him appointments as a child rep and help him to obtain a democratic primary nomination as judge and Mr. Trowbridge therefore followed Mr. Bender's instructions in all matters and was always working for Mr. Bender.

38. On June 11th, 2019, five days after the ruling ordering Mr. Bender's appointment, I signed a retainer agreement and issued payment to Mr. Trowbridge and I believed him to

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be my attorney. I now understand he did not file an appearance until after speaking privately to Mr. Bender and three weeks after I signed my retainer agreement.

39. On at least one occasion between June 11th, 2019 and June 24th, 2019 Mr. Trowbridge spoke privately to Mr. Bender about my case before I had personally met Mr. Bender. Mr. Bender instructed Mr. Trowbridge from their first meeting until Mr. Trowbridge stepped down in October, 2020. This was openly stated to me as Mr. Bender, according to Division custom, has been in charge of all decisions about my case since his appointment. Under Grace Dickler, attorneys and judges know that GALs in the Domestic Relations Division are in charge of cases and judges defer to GALs and follow their instructions.

40. On June 25th, 2019 I met Mr. Bender for the first time. (Exhibit EE).

41. On July 5th, 2019, 31 days after the order appointing a GAL and 1 day after the time had passed for an attentive attorney to have filed an appeal or petition to set aside the illegal GAL appointment ruling, Mr. Trowbridge filed his appearance.

42. Mr. Trowbridge also told me early on it would be good for me to not go to court so often, that strategically it would be better for the judge to see him fighting the battles and for me to stay away so that the judge could think of me as a likable woman.

43. Between March, 2020 and August, 2020 Mr. Bender and Mr. Trowbridge conspired with Mr. Wehrman, Mr. Matt's attorney, Presiding Judge Robert Johnson and Kaye Mason to have me tried and found in contempt of court without my awareness.

- a. Prior to March 8, 2020 someone I believe to be Mr. Trowbridge, at Mr. Bender's instruction, created a fake email address and, purporting to be me, logged into the Circuit Court's e filing system Odyssey File and Serve

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from Tyler Technologies based in Texas. Because there are no security features in the Circuit Court's version of Odyssey File to verify the identity of pro se litigants anyone can log into Odyssey file and click a box attesting to be "me" and then, receiving a "confirmation" email at the fake email address, the individual can "confirm" they are "me".

- b. Once he had created the fraudulent login details the individual I believe to be Mr. Trowbridge was able to change my service contact address. Since October, 2016, when my case began, I had been living at 423 Linden Avenue in **Wilmette** in the **60091** zip code. Someone I believe to be Mr. Trowbridge changed my mailing address to 423 Linda Avenue in **Chicago** with a **60891** zip code. After this change two announcements from the court were returned "Addressee Not Found". Notably I would not receive any notice about the postponement of a court date that I was not informed was scheduled due to subsequent fraud. **(Exhibit A)**
- c. I would not learn about this and the other acts of fraud until much later but throughout this time Mr. Trowbridge mentioned "problems with the court software". I have never heard anyone else mention problems with the court computer system though it is a claim Mr. Trowbridge still repeats.
- d. When I eventually had occasion to learn what a docket is and that I could look at it, in the summer of 2021, I began to discover some of these irregularities. In June, 2021 I visited the clerk's office and spoke to the woman who handles requests for printouts from the Docket. She told me that the change to my address was made by "me". I said, "No, I didn't

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make the change”. She said, it was your email. I said it was not *my* email, would she please tell me what email was used purporting to be mine. She would not.

- e. I happen to have already had a login for Odyssey file at this time associated with the only personal email I have used for court filings. The Circuit Court version of Odyssey file allows for seemingly any number of individuals to identify themselves as a party named in the case without flagging the existing user. This is to say, unlike most secure software, when someone created a new log in with my name, there was no “flag” in the form of an email saying, “Someone wants to change your address and email, is that you?”, for example.
- f. In June, 2021 I called Tyler Technologies to ask for the IP address and email used to make these changes. These changes were made by someone attesting to be me so I believe I own this information. The software company would give me this information.
- g. On March 8, 2020 Mr. Trowbridge was served with a Petition for Rule to Show Cause against me, or contempt allegation, filed by Mr. Matt through Mr. Wherman. He aggressively hid this petition and associated court appearances over the next four months, making efforts on two occasions to actively dissuade me from being suspicious, confirming “nothing was happening” .
- h. Mr. Trowbridge billed me for reading the PRTSC on March 8, 2020 but I would not see the four word line item on the March bill until a year later.

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Neither party informed me of the allegation voluntarily over the next four months. This was his first overt act of fraud by hiding the petition.

- i. On April 6th, 2020 a continuance was allowed due to Covid.
- j. On April 10th a post card was mailed to the fraudulent address for me in Odyssey File (“Linda” Avenue). On that same date an email was sent to Brad Trowbridge at his verified email. The notice was to inform me of the continuance of a court date I did not know about. Mr Trowbridge still did not inform me of a PRTSC or a scheduled court date (Exhibit A). This was his second act of fraud in not disclosing the court date.
- k. Mr. Matt is a vexatious litigant and I mistakenly believed that during the early Covid lockdowns there was no court activity so on April 22, 2020I wrote to Mr. Trowbridge to express relief that “no motions were being filed”. At this point in time I would have referred to any written court pleading as a “motion”, including a petition. 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 =).”* (Exhibit B)
- l. On April 22, 2020, Mr. Trowbridge wrote back: *“Megan. Yes, unfortunately it took a pandemic to stop Peter’s abuse of you!”*. (Exhibit C). This was his third act of fraud in actively assuaging any fear and deceiving me as to avoid discovering the truth.
- m. On May 26th, 2020 a continuance was allowed due to Covid.
- n. On May 27th, 2020 a post card was mailed to the fraudulent address for me in Odyssey File. On that same date an email was sent to Brad Trowbridge at his verified email. The notice was to inform me of the continuance of a court date I did not know about. Mr Trowbridge still did not inform me of a PRTSC or a

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scheduled court dat. This was his fourth act of fraud by not disclosing this information.

- o. On July 6, 2020 a status call was held. I have no idea who was there or what was said.
- p. On July 12, 2020 I noticed a reference to court on Michael Bender's bill for the court appearance on July 6, 202. I emailed Mr Trowbridge, "Zoom Court What?" (Exhibit D)
- q. Mr. Trowbridge wrote back, not mentioning a contempt allegation, so I assumed it was a status call for Mr. Bender's removal. He wrote, "*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?*" (Exhibit E). This was his fifth act of fraud.
- r. On July 20, 2020 there was a status call which Mr. Trowbridge attended. At that time I believed it was simply a call for Mr. Bender to step down from the GAL appointment. My understanding was that Mr. Bender had agreed to step down the fall before. At this point I did not know there was a PRTSC.
- s. Following Mr. Trowbridge's instructions I did not attend this status call. I do not know if parties expressed surprise at Mr. Trowbridge's absence from the prior status call. I don't know if he had in fact been absent, as this is based on Mr. Trowbridge's statement and he has lied to me many times.

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I don't know if Mr. Trowbridge lied about me. I do not know if Mr. Trowbridge was asked why he did not file a response or indicate he had received the contempt allegation four months before.

- t. It is not normal for a litigant to decline to answer a petition, to decline to appear at court, and for her attorney to do likewise for four months. I have attended many status calls during my entanglement with the Domestic Relations Division of the Circuit Court. In my experience when any division judge, including Judge Johnson, sees one party missing he will ask the attorney in attendance if he has spoken to the party and he will ask any other court official such as a GAL if he has spoken to the party. Usually they will call the person immediately, particularly now that one can call into a Zoom hearing, to avoid having to schedule another date.
- u. Judge Johnson, Mr. Bender and Mr. Wehrman have all refused to acknowledge my requests for explanation.
- v. The most obvious lack of action is any inquiry by Mr. Bender during this time. The Court's appointment of Mr. Bender is based on the Domestic Relations Division custom of placing a GAL as the adjudicator of all matters relating to the minor children. No matter what the law says, all Domestic Relations Division attorneys I've spoken to have told me that Mr. Bender has the final decision making authority for the children on all matters and acts as their advocate. The fact that Mr. Bender can document no efforts to contact me through my attorney or directly during this period

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is because he was aware of Mr. Trowbridge's fraud and in fact directed him to commit the acts.

- w. Mr. Bender has had every opportunity to provide to me dates of calls, emails or other proof that he was in contact with Mr. Trowbridge regarding the allegation of failure to comply with parenting orders. Which is to say, that he was doing his job. He has provided no explanation or evidence.
- x. Mr. Trowbridge refuses to tender to me his emails with Mr. Bender and Mr. Wehrman from this time.
- y. On July 20, 2020 I again asked if anything was filed against me and if Mr. Bender had stepped down. On that date Mr. Trowbridge finally informed me of the PRTSC. (Exhibit F)
- z. Mr. Trowbridge removed the proof of service before emailing me the PRTSC. Mr. Trowbridge still refuses to provide to me the original proof of service and the email with which it was sent. This was his sixth act of fraud.
- aa. Mr. Wehrman refuses to provide the email showing the date and delivery of the PRTSC to Mr. Trowbridge or any response, such as an email stating "received". Mr. Wehrman is conspiring in Mr. Trowbridge's voluminous acts of fraud out of self interest and in conspiracy in their shared criminal acts.
- bb. On July 20, 2020 when I finally learned about the contempt allegation, after the fourth scheduled court appearance. I stated, "I don't see any

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evidence. I don't understand what he wants", noting that there were no exhibits included with the PRTSC or appended to the PRTSC itself provided to me by Mr. Trowbridge.

- cc. I know from experience that Mr. Wehrman sends his proof of service as a page at the end of his pleadings and often the exhibits at the end of the pleading. In the proof of service Mr. Wehrman filed for this PRTSC on March 8, 2020 he attested to the Court under threat of perjury that he emailed this PRTSC to Mr. Trowbridge at the email address I know to be Mr. Trowbridge's on March 8, 2020.
- dd. On July 21, 2020 at 3:20 pm I wrote to Mr. Trowbridge to explain that I'd filed an ethics complaint about Mr. Bender to the ARDC. (Exhibit G)
- ee. On July 21, 2020 someone I believe to have been Mr. Trowbridge acting under the instructions of Michael Bender used the fake email to again log in to Odyssey File and file a "pro se" appearance on my behalf, though Mr. Trowbridge had not told me he quit or filed a motion to withdraw. This was also told to me by a clerk at the Division Clerk's office in June of 2021.
- ff. I believe that Mr. Trowbridge then informed Mr. Bender that I had complained about him to the ARDC because the next day Mr. Bender, who had not spoken to me in almost a year, had his assistant contact me to schedule a meeting to check in.
- gg. The main allegation in the PRTSC, which Judge Johnson ruled I had done, was that I violated an order by Judge Johnson that "ABA shall continue".

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The motion was filed on March 8, 2020 a time when all therapy was stopped in the state by law. Since there was no evidence of contempt and contempt wasn't happening, I did not think a ruling of contempt was possible. However, at the hearing, which went very fast and during which time Mr. Trowbridge said virtually nothing, I was found in contempt.

- hh. Mr. Wehrman also did display some documents at trial which I had never before seen. I still see no exhibits ever filed by Mr. Wehrman on the docket with regard to this PRTSC allegation and I've never received stamped copies of any exhibits related to the spurious contempt ruling.
- ii. However I recall at trial Mr. Wehrman screenshared an email from me to A.D.M.'s ABA therapist provider. I wrote this email because A.D.M. had reported to me that when his father supervised ABA therapy over Zoom he was holding down A.D.M. in the chair and kicking and dragging him back when he tried to escape. His brother T.M.M., who is neurotypical, confirmed this.
- jj. I reported the violence surrounding Zoom therapy to DCFS, to Mr. Bender and to A.D.M.'s school in the summer of 2020.
- kk. I also purchased a home license for the ABA software, Teach Town, designed to be more appropriate for virtual ABA for children like ADM who struggle to attend over video conferencing tools. At this time I was delivering the program to him. Motivated primarily by a desire to stop A.D.M.'s mistreatment, I told the therapy provider I did not need Zoom therapy because the school provided another online ABA alternative.

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Nobody, including Mr. Matt, Mr. Bender, or Mr. Trowbridge informed me there was a concern about me administering Teach Town as an accommodation to COVID lockdowns.

- ll. I was found in contempt of court in a ruling not supported by fact on August 21, 2020. Because the contempt ruling was so shocking to me, Mr. Trowbridge said he would file a motion to reconsider. He did not.
- mm. The period for filing an appeal or motion to reconsider in Illinois is thirty days after ruling. I know this now, but I did not know this then. Mr. Trowbridge quit forty days after ruling with no appeal filed. When he quit he again referred to ongoing issues with Odyssey File and health issues.
- nn. Because of what appeared to me to be profound incompetence and a reference to health issues during a stressful time geopolitically, I assumed Mr. Trowbridge had an addiction of some kind and so I did not look into his malfeasance in 2020.
- oo. I was ordered extremely high attorneys fees as part of my sanction for the baseless contempt ruling. This contempt ruling continues to be raised as a primary basis to attack my character before the Court, and “evidence” of parental unfitness.
- pp. This contempt ruling, clearly based on multiple acts of fraud, is now being used in a motion to revoke my parenting rights completely from half decision making authority and half parenting time in the Parenting Plan entered in 2017 to an immediate revocation of all parenting rights and no parenting time.

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qq. Mr. Trowbridge still vehemently persists in the fraud scheme and persists in ongoing acts of deceit and obfuscation intended to curb my efforts to access justice and to hide his crimes and the crimes of others. On April 13, 2022, Mr. Trowbridge responded to a document subpoena with a continued refusal to provide: the notification of filing received with the PRTSC filed on March 8, 2020 or the email from opposing counsel delivering the PRTSC to Mr. Trowbridge at that time. Mr. Trowbridge wrote, knowing full well that he had received filings and correspondence from the court on a continued basis between March and August of 2020: “I did not fail to disclose communications and notifications to you. Courts shut down on March 17, 2020 for several months due to the pandemic.” and continues, deceitfully, “Clearly, you were aware of the existence of that PRTSC. To say you were not aware of it is not only inaccurate, but also bizarre”. (Exhibit NN). Obviously the Courts were impacted, live hearing curbed, but they did not “shut down” in that notifications, pleadings and correspondence were made. Mr. Trowbridge’s denial of this is in furtherance of his racketeering activity and fraud.

44. On August 28, 2020 Mr. Bender had his friend Dr. John Palen, a psychologist, appointed as parenting coordinator by Judge Robert Johnson in order to facilitate communication and decision making between me and Mr. Matt. Dr. Palen served in this capacity until May 25, 2021. A few months after his appointment I became aware of further misconduct by Dr. Palen and the other parties in my case.

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- a. On December 5, 2020 I learned that Mr. Bender, Mr. Wehrman, Dr. Palen and Judge Johnson, via his clerk Kaye Mason, maintain a secret email thread with the heading, "IRMO Matt; 2016 D 9534; COURT ORDER", my divorce case number and married name. Although all parties and Judge Johnson refuse to share the emails with me I believe it is an ongoing conversation about my court case intentionally excluding me or anyone representing my interest.
- b. I learned about this email conspiracy because Dr. Palen accidentally copied me, then pro se, on an email intended for Judge Johnson's clerk, Kaye Mason, who shares my last name. He wrote, "I want to be paid. It is as simple as that."

(Exhibit H)
- c. At this time Dr. Palen had a positive retainer balance, no unpaid invoices and, legally, was already "paid".
- d. I was copied accidentally. Dr. Palen thought I was Ms. Kaye Mason, Judge Johnson's clerk. Dr. Palen then wrote, "Sorry- this was meant for another case. I had not noticed Ms. Mason on the list of recipients." (Exhibit I)
- e. Dr. Palen lied. The subject line was my case number and married name and all parties, including Kaye Mason, are involved in my family's case.
- f. There are more ex parte emails but all parties including Judge Johnson refuse to tender to me the other emails in this ongoing thread. I have subpoenaed the emails from both Brianna Steger, attorney for the Court, and from all parties in the email thread but have not received a response or a motion to quash.

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- g. I have not received any of the emails though at one point in March, 2022 Judge Johnson affirmed the email thread exists because he said he'd "looked at them and they are fine".
- h. Illinois law demands all *ex parte* communications be swiftly shared with the party who was excluded. There are no exceptions. The Illinois Code of Judicial Conduct, Rule 61, Canon 3 explicitly states:

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 the judge reasonably believes that no party will gain a procedural or tactical advantage as a result of the *ex parte* communication, and the judge makes provision promptly to notify all other parties of the substance of the *ex parte* communication and allows an opportunity to respond.

45. With Dr. Palen as parenting coordinator my already unbearable expenses skyrocketed. Mr. Matt wishes to have daily contact and weekly meetings with him. With Dr. Palen in place I then had to pay for the harassment. Often Mr. Matt would email many times a day and specifically requested meetings more than once a week. Dr. Palen eagerly agreed to every meeting and neither party respected my wish to limit meetings to monthly. Every month I had to try to find a way to meet bills while going further into crippling debt.

46. As with Mr. Bender, Mr. Matt has used the appointment of a Parenting Coordinator to abuse me and the children. Mr. Matt has used the Court ordered parenting coordinator to exploit A.D.M. and to force me into complicity with financial crimes, in violation of my financial service licenses and employment agreement. Judge Robert Johnson, Christopher

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Wehrman, Michael Bender and Kaye Mason have all been aware of this scheme for at least a year and complicit in blocking attention or ruling that might raise this along with other issues of fraud to the awareness of others outside the Bender Syndicate.

- a. In early May, 2021 Dr. Palen facilitated a meeting with Mr. Matt and me at Mr. Matt's request. The goal of the meeting, according to Mr. Matt was to, "Get Megan not to interfere with my new business plan". Mr. Matt knew that I have a tendency to insist on a traditional interpretation of tax and finance laws and a disinclination to commit fraud.
- b. Mr. Matt explained that his new business plan is to name A.D.M., who does not consistently count to ten, as CEO of his business in order to defraud his primary business clients out of contracts set aside for businesses owned by disabled people. This would also be in furtherance of Mr. Matt's wish to avoid reporting salary or paying employment taxes and reporting and earnings as 1099 contractor fees as he could avoid naming himself as an employee.
- c. I said I was opposed because A.D.M. is not the CEO and I know that would be fraud.
- d. I then said I was concerned that if A.D.M. is a business owner he might lose his disability benefits when he turns eighteen.
- e. Mr. Matt said this would not be a problem because A.D.M.'s shares would "revert" to him when he turns eighteen. Because there is no legal way to "revert" gifts given to the young and vulnerable, this would be in fact theft.

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- f. Dr. Palen said he thought that sounds like a nice activity for A.D.M. and encouraged Mr. Matt to send me a business plan. Mr. Matt sent a businessplan to all parties by email, outlining the plan described here. By encouraging Mr. Matt and encouraging the creation of a business plan, Dr. Palen demonstrated a wanton disregard for A.D.M. who he was assigned by the Court to protect and (Exhibit J)
- g. In addition to the cruelty and shamelessness of exploiting a disabled child and stealing contracts from legitimate business owners with disabilities, such schemes cannot be tolerated or even witnessed by someone in my profession.
- h. In addition to my training to obtain my securities licenses, I receive ongoing training to identify and intervene where I observe acts of money laundering, financial exploitation of the elderly and disabled, corruption and bribery, or abusive practices by fiduciaries. I am also required to report quarterly on my my children's financial activities and any judgments, bankruptcies or liens on my property
- i. As a FINRA licensed advisor I will lose my license for even a misdemeanor if the crime is financial in nature or for any felony. In addition to all the obvious legal issues, the Court cannot be allowed to force me to witness, conspire in and commit fraud on my children.
- j. I fear for A.D.M.'s safety and well being while under Mr. Matt's care and under the direct control of parties named in this suit. Although Mr. Matt has never to my knowledge drafted a sentence toward a will or estate plan

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for his own interests, he writes in the one page business plan, “Megan should have no claim to any of the money or shares even in case of the death of A.D.M.”.

- k. This scheme is also very dangerous because I know it to be a method for Mr. Matt to launder money. I have seen him use the method of business formation in the past as way to “gift” or “loan” assets through his father from his unreported assets abroad. In this way A.D.M. may not only be victimized by a crime but may be forced to commit money laundering crimes himself as part of the exploitation.
- l. I fear for A.D.M.’s safety and well being, though
- m. I remain concerned that A.D.M. and T.M.M. have been or will be used by Mr. Matt to facilitate money laundering, kickbacks or bribes through the creation of trusts and other vehicles into which Mr. Matt’s father may deposit “gifts” and the proceeds can be paid directly to individuals in the role of guardian, executor or trustee. This seems especially true with regard to Mr. Bender, Mr. Wehrman and Judge Johnson who are all members of the Bar.

47. When Dr. Palen was appointed I had hoped that Mr. Bender would finally be removed because the costs were crippling to me. So I moved to have Mr. Bender removed. The motion was denied.

48. Since leaving Mr. Matt in the summer of 2016 my goal had always been to get on my feet financially. Having experienced unrelenting abuse and crippling expenses related to court, I never raised any issues because I thought doing so would delay Mr. Bender’s

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removal. I also was hoping to someday have enough money to hire an attorney to advocate for me. When I realized Mr. Bender's appointment is permanent, I tried to force him to consider the facts of the case, which show Mr. Matt has very disturbing tendencies and little capacity for sound parenting decisions.

49. With Judge Johnson in firm opposition to Mr. Bender's leaving, I tried to find a way to move the process toward a better outcome for my children. At that time my main concerns were obtaining sole medical and educational decision making authority. I had documented extensively with the Court actions Mr. Matt had taken in such decision making capacity to the harm of the children, most notably Mr. Matt's adamant opposition to the use of psychiatric medications. Although I consider myself quite conservative about the administration of medication myself, all A.D.M.'s doctors, teachers and myself are in agreement that A.D.M. needs medication at the present time to meet important life goals. Most notably, A.D.M. has displayed aggression and impulsivity while untreated for his severe ADHD, requiring him to be relocated from two different schools. Further, I had been warned by friends with older children with developmental disabilities that some adult living homes and facilities do not accept adults with a history of behavior problems. I don't know what kind of living arrangement A.D.M. will need or want in the years to come but I don't want him to lose any opportunities for a good quality of life due to medical neglect. At this point medication is the only tool we've found to consistently reduce physical violence such as hitting and biting, loud and profane outbursts and property destruction. It keeps him able to be in his school and his home.

50. I was told by some attorneys I consulted with that the only way to stop some of Mr. Matt's misconduct was to ask for a Custody Evaluation or Section 604.10 b. Unable to

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afford one, I moved for a hearing on financial allocation as well as the appointment of a Section 604.10 b evaluator of my choosing. I had checked availability and credentials and was going to ask the court to hire Dr. Holly Sobel a well regarded forensic psychologist working in Chicago and the Northshore where our family lives and attends Court. I particularly hoped to have one woman assigned in our case.

51. I then learned how to draft a PRTSC and created three to try to raise the issues impacting the children. The main concerns were robustly documented and the facts uncontested. Some of the issues were repeated persistent child neglect, unsafe living conditions, harassment of me, persistent and intentional violations of parenting time, refusing to get background checks on boarders or to tell me their name as required by plan. I included exhaustive evidence. (Exhibits L, M, N)

52. I filed a motion to allocate medical and educational decision making to me through a post-decree custody evaluation or 604.10 b evaluation. Judge Johnson ruled on my motion and denied it completely, stating at that time that there were no issues with the parenting plan.

53. I had anticipated, having very clearly laid out for the court some of the concerns about Mr. Matt's behaviors and parenting choices, there would be a change in the case and some actions might be taken for the children's well being. I thought Mr. Bender in particular would be embarrassed to be associated with a parent with so many distasteful tendencies as Mr. Matt, as exhibited repeatedly in my pleadings, as all the children's doctors, therapists, teachers would agree.

54. However it was clear that my pleadings were unwelcome by Judge Johnson and Mr. Bender.

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- a. In March, 2021 I first attempted to schedule a hearing on my petitions.
- b. First Judge Johnson delegated the pleadings to Mr. Bender to rule on them informally, which is to say if Mr. Bender liked them they could be heard and if he did not like them they would be buried forever.
- c. Outsourcing litigation to GALs is a longstanding custom in the Domestic Relations Division of the Circuit Court of Cook County under the leadership of Grace Dickler. Though explicitly prohibited under Illinois law, Judge Johnson and others reduce their workload by assigning pleadings to GALs to review and rule upon. The GALs are then handsomely compensated by parents. Judges like Judge Johnson receive the further benefit of assurances of a future appointment as a GAL or child rep and are therefore motivated by future kickbacks to provide more cases and compensation to their friends in the role of GAL.
- d. Shortly after Mr. Bender was assigned to rule on whether my PRTSCs could be heard, Mr. Bendeer ordered Dr. Palen to call me. Dr. Palen said, “I spoke to Mr. Bender who obviously knows the case a lot better than I do. He wanted me to tell you no harassment happened.”
- e. Mr. Bender likes to “flex” by having other parties call to relay his messages, showing that he’s in charge.
- f. I persisted with Judge Johnson. I was particularly concerned with Mr. Matt’s tenement scheme wherein he built three illegal apartments in his home, each with an unpermitted bathroom, kitchen, washer and dryer. No fire escapes or widened halls were added. Also all tenants had access to

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the children's unlocked living quarters. Mr. Matt stated this was not an issue because the tenants had locks on their doors. The children do not. Mr. Matt also refused to get background checks on the tenants or to tell me their names, as required by parenting plan.

- g. I also persisted with Judge Johnson to rule on my motion for financial allocation and my response to Mr. Wehrman's motion to quash a subpoena to his firm for Mr. Matt's payments. I requested these because Mr. Matt had claimed to the court in his financial affidavit to earn \$27,000 per year and have \$1,000 in a single account. (Exhibit O)
- h. My motion for allocation of fees presented a thorough description of Mr. Matt's assets which he had not disclosed in his financial affidavit. I provided bank statements with Mr. Matt's name at his father's address in Germany and Mr. Matt's businesses named on some accounts. I presented proof of at least five other accounts and proof of three businesses not included in the affidavit.
- i. I also subpoenaed Mr. Wehrman for the source of payments he had received from Mr. Matt. Because the motion for allocation of fees in support of which I was seeking Mr. Wehrman's payment records, was about allocation of fees to an attorney, Mr. Bender. Mr. Wherman is an attorney so the source of funds available to pay attorneys is relevant in a motion to allocate fees to attorneys. (Exhibit P, Q, R).
- j. I also happen to know that throughout our divorce, when our assets were meant to be in Receivership, Mr. Matt maintained a joint account with his

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father, Leo Matt, at Wintrust Bank. Leo Matt would deposit funds from Peter Matt's unreported businesses in Germany and then Peter Matt would withdraw the money to spend as he wished, calling the funds loans or gifts. Mr. Wehrman and Mr. Peter Matt simply state that the account is not Mr. Peter Matt's, just his father's account.

- k. I have presented checks signed by Mr. Peter Matt from the account to me. I have presented checks paid by me to Mr. Peter Matt and accepted into the account. Mr. Peter Matt's name is on the account.
- l. Because even then I knew Mr. Bender's fees would bankrupt me, I felt it was fair to show that Mr. Matt has resources to pay these bills. I did not and was unable to acquire more debt.
- m. When I repeated my request for Judge Johnson to rule on my response to Mr. Wehrman's motion to quash the subpoena, Mr. Wehrman said, "Your honor, she just wants to show I'm laundering money for my client". No hearing was allowed nor has been since.
- n. When I again pushed to have a hearing scheduled on my petitions, Judge Johnson addressed Mr. Wehrman and said, "You're going to have to agree to a 604.10 B or she's just going to keep doing this."
- o. Mr. Wehrman and Mr. Bender discussed the matter outside of court and decided between them to initiate a 604.10b evaluation with Dr. Gerald Blechman, Mr. Bender's choice, a friend of his whose office is more than an hour from my home, in DuPage County, Illinois. Mr. Bender said he recommended him in part because he would be efficient, estimating four

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months to complete his evaluation. He has now been in place for more than a year and will not even provide an estimate to the end of his engagement.

- p. On May 25, 2021 Judge Johnson ordered Dr. Blechman's appointment. Because there was no new 604.10 b motion seeking an appointment I asked Mr. Wehrman to draft the order with the verbage from my denied motion, which limited the scope to parental decision making rights, not parenting time. Mr. Wherman insisted on drafting it without scope and it was so entered. (Exhibit K).

58. Parties consistently block my right to file any pleading out of a wish to avoid disclosure of information damaging to themselves or to Mr. Matt. On May 27, 2021 I emailed Ms. Kaye Mason, Judge Johnson's clerk, to schedule my hearing on my petitions to stop harassment of me and the Motion for Allocation of Fees.

df. 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.

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- 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.” Ms. Mason relayed a message from Mr. Wehrman to Judge Johnson asking him to personally cancel the hearing. Judge Johnson verbally told Ms. Mason to cancel the hearing and she relayed that she had done so to Mr. Wehrman and me.
- j. Petitioner is given the ongoing opportunity to discuss any number of matters with Judge Johnson via his clerk on an ex parte basis. Mr. Wehrman is a member of the secret email thread and is able to send messages to Judge Johnson through Ms. Kaye Mason. 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. (Exhibit EE). 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.
- 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”.

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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, which I assert to be in furtherance of criminal conspiracy, against me.

w. In fact Mr. Wehrman is allowed to have PRTSCs heard during this time and has. No custody evaluation end is in sight.

59. It was finally at this time, around Memorial Day, 2021, that I became certain that I am the victim of corruption. I also became aware of the phenomenon of guardian abuse being raised in the media. One reason I had previously talked myself out of believing I was the victim of corruption was that I am not rich and Mr. Matt's assets are hard to access. I didn't understand why venal men would want to target us. Though I understand that guardians and GALs are quite different, I came to realize that A.D.M., not me, might be the target of corruption due to the ability of others in authority to exploit him until the end of his life. I remain extremely concerned that efforts to undermine me might be intended to ultimately take guardianship of my disabled son.

60. That summer of 2021 I hired a therapist, Lina Costelloe, and hoped she'd tell me I was paranoid but she said she believed me. She still does. She also said that I was in danger and that I needed to start getting more paranoid.

61. That summer and fall I also disclosed these matters to Michael Sharp, head counsel for Jefferies and Michael Wolf, head pastor for Lake Street Church of Evanston.

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62. Two fellow Lake Street congregants referred me to two domestic relations attorneys and two legal clinics. All refused me. Neither family law attorney wanted to be involved in a case with Michael Bender. One referred me to an attorney named Alexandra Brinkmeier. My mom, who is retired and not wealthy, loaned me the money to retain her. I hired her to help protect me during the Custody Evaluation process which I knew to be dangerous for me and the children.

63. Since his appointment Dr. Blechman, the Custody Evaluator, has administered three psychological evaluations of me:

- a. 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.
- b. 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.
- c. On this date Dr. Blechman told me he had administered the same psychological evaluations to Mr. Matt. It is my belief that Mr. Matt was given these tests and demonstrated very limited empathy, a pattern of deceitfulness and other clusters of traits often associated with sociopathy and/or narcissistic personality disorder. These are not ideal caregiver qualities and so Mr. Bender instructed Dr. Blechman to obstruct justice and hide all tests. Dr. Blechman has.

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- d. 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. He has never released the results and refused to provide me with the test results or raw data for myself or for Mr. Matt when I subpoenaed them in March, 2022.

64. It was during the custody evaluation process that T.M.M. began to report physical and emotional abuse by Mr. Matt to Dr. Blechman and others. Mr. Bender and Dr. Blechman have aggressively hidden reports of child abuse from the court and intentionally destroyed any possibility of an appropriate investigation into allegations of child abuse.

- 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 GG)
- 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. 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.

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- 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.M.M., then aged nine, and Dr. Gerald Blechman, Custody Evaluator. At this time T.M.M. 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.M.M. actually intended self harm, but I was concerned about his mental well being. Dr. Blechman also stated that he felt T.M.M. seemed distressed.
- h. That evening T.M.M. 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 had known Mr. Matt to be extremely controlling but until this time I had not realized how intensely he has targeted T.M.M. for his abuse.

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- i. Since before he was born, Mr. Matt has planned for T.M.M. to be a professional athlete because his family believe's athletic achievement matters. So Mr. Matt likes to have T.M.M. in at least four hours of soccer training on every school day (he is in fourth grade) and at least six hours on weekends during the school year. During the summer he likes to have him in six hours of soccer camp, then a league or private training after camp, then another league and private training on weekends. On top of this he is fixated on T.M.M. doing a "gifted" program, which is to say an academic enrichment program, which T.M.M. hates. Northwestern refers to The Northwestern Center for Talent Development, an enrichment program Mr. Matt makes T.M.M. attend despite his opposition. Because of my own experience with Mr. Matt I know he can become very fixated on controlling the thoughts, feelings and behaviors of his targets and I see the damage it is causing T.M.M.. It isn't enough that he has to train all day and do extra homework but T.M.M. is under extreme pressure by Mr. Matt to "like it".
- j. On Tuesday, July 28th, 2021 I wrote to my attorney at the time, Alexandra Brinkmeier, concerned that T.M.M.'s distress might be used to disparage or discredit me. (Exhibit Y)
- k. Ms. Brinkmeier was concerned about T.M.M.'s behavior and called Michael Bender that day to report the incident and express an interest in removing T.M.M. from his father's home while this matter could be investigated.
- l. After picking T.M.M. up from soccer camp on Tuesday, July 28th, 2021, I was driving T.M.M. and his brother A.M.M. to the community pool to swim when he escalated his talk of self harm to action. I recounted the events to my attorney:

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“I was in the car around 5 today, driving T.M.M. and A.M.M. home from camp. T.M.M. picked up a plastic wrapper in the backseat and covered his mouth. He said he was going to kill himself. A.M.M. 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.M.M. yelled, is it because of Dad’s lies. T.M.M. didn’t say anything. I said, what do you mean about Dad’s lies. A.M.M. said, dad’s lies! I asked T.M.M. 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.” (Exhibit Y).

- m. I was concerned because T.M.M. 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.M.M. to camp, that she wanted to see him first.
- o. While waiting for the appointment, at around 4pm, I received a phone call from Ms. Brinkmeier who had just spoken to Mr. Bender. She said, “Bender spoke to Blechman and said it never happened.” I asked, “What never happened?”, She said, “Bender said Blechman said T.M.M. was upset but he never said he wanted to kill himself.” I told her Mr. Bender was trying to flex with her, that I don’t believe Blechman said that. I said T.M.M. made statements like this at least three times. I didn’t believe T.M.M. was in physical danger but both Dr. Blechman and I were concerned.
- p. At 5:00pm Mr. Matt met me at Dr. Brunner’s office with T.M.M., who was now in his care per court ordered parenting time. T.M.M., Mr. Matt and I entered Dr. Brunner’s office and she interviewed T.M.M. in our presence. After exchanging greetings, neither Mr. Matt nor I spoke. Dr. Brunner asked T.M.M. a number of

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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.M.M. 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. (Exhibit Z)

- q. After this appointment Mr. Matt informed his attorney, Mr. Wehrman, who informed Mr. Bender not to talk to Dr. Brunner.
- r. That day Dr. Brunner called Mr. Bender who could not be reached and did not return her calls. Although Mr. Bender had obviously been on calls that very day in order to try to obstruct justice and intimidate Ms. Brinkmeier he would not return Dr. Brunner's call for almost a month in order to make sure he did not hear reports of child abuse prior to his next court appointment and in order to make sure any investigation was ruined.
- s. On Saturday, August 7th, 2021 T.M.M. and his brother A.M.M. returned to my residence per Parenting Plan. After dinner on that date I asked T.M.M. if he had ever seen his dad hit or drag his brother, A.M.M.. A.M.M. had reported to me that during the Covid lockdowns in the spring and summer of 2020 Mr. Matt had hit him, kicked him and physically restrained him in order to force him to do Zoom ABA therapy. I asked T.M.M. if that was true. T.M.M. said, "Yes it was really bad during COVID."
- t. I asked T.M.M. if his father ever hit him (T.M.M.). He nodded his head. I asked him where his dad hit him, he put his hand on his right cheek.
- u. I asked why his dad had hit him. T.M.M. said, "Northwestern".

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- v. T.M.M. then started crying and hid his face with his hands. He said he didn't want to talk about it.
- w. At this same time T.M.M. had been congested, feverish and had a sore throat.
- x. On Wednesday, August 11th, T.M.M. 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.M.M. was experiencing is sometimes the result of trauma which weakens a person's immune response. I told Dr. Woskow that T.M.M. had recently reported physical violence in the home at his father's residence.
- y. Dr. Woskow questioned T.M.M. 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.M.M. on the face, his hand would hit the right side where T.M.M. first indicated to me he had been hit. T.M.M. then became upset and said, "never mind, he hit my arm" then he said, "never mind, he didn't hit me". T.M.M. then wanted to hide his face and not be on screen. T.M.M. 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.
- z. 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.M.M. during an investigative process. I still do not have this record though I believe every effort was made to bring it to the Court's attention through Mr. Bender.

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aa. 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.

bb. Mr Bender intentionally avoided talking to Dr. Brunner, aware of what T.M.M. had stated in Mr. Matt's presence, until after the next status date about a week later, at which time he played down T.M.M.'s distress and said suicide was never mentioned.

cc. Due to Mr. Bender's intentional failure to intervene, a proper investigation was made virtually impossible.

dd. Mr.Bender's inactions,whether induced to hide abuse by Mr.Matt or out of a personal interest in protecting his reputation, have been profoundly damaging to T.M.M. 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.

65. I am unable to retain counsel due to my status as a target of corruption. This was made evident when I emailed my most recent attorney, Alexandra Brinkmeier an email with the subject line, "Crimes I've reported to you" on November 8, 2021, and asked for help in stopping ongoing crimes against me and bringing these facts to Court.

a. At the order of senior leadership at her firm, Ms. Brinkmeier abruptly resigned three days later on November 11, 2021, the reason being "philosophical differences".

b. At the status hearing on November 15, 2021 I asked Judge Johnson to please deny Ms. Brinnkmeier's motion until counsel could be found to replace her and stated

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that her abrupt departure would cause me material harm and imperil me and my children. Judge Johnson ignored my request and allowed Ms. Brinkmeier to resign with no attorney to replace her. I submitted an affidavit stating my concern because I didn't know what motion or action to file to try to stop her. (Exhibit AA)

- c. At this same appearance Michael Bender asked Judge Johnson to order me to pay his fees for a second time. Ms. Brinkmeier pointed out that I cannot afford the fees, that I have an allocation of fees motion pending for years. Judge Johnson refused to hear the allocation of fees motion and ordered the fees. Even as he was ordering it I knew that it was impossible to make the payments being ordered, but I knew if I said anything else he might take the children or put me in jail immediately.
- d. On November 16, 2021 Judge Johnson fraudulently entered an order saying Michael Bender's fees are necessary and reasonable. Because Judge Johnson has refused to hear my arguments for three years against Michael Bender's fees bankrupting me he could not form an opinion if they are reasonable. As Michael Bender is only appointed in order to get kickbacks and performs no duties, he also knows Mr. Bender's fees to be unnecessary, particularly in his third year of "writing a report" per statute. Because Judge Johnson knows Mr. Bender to be engaged in racketeering activities, he further knows his fees cannot be just.
66. Since this time I have desperately sought to have my case transferred from Judge Johnson's calendar, first through a Petition for Substitution of Judge in which I raised the issue of Judge Johnson's continued actions to hide the crimes of his colleagues and friends and the multitude of criminal acts that had been committed in the conduct of this case. At the time of filing I also sent a public letter to Judge Dickler, copying members of

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the press and civil rights bodies, asking Judge Dickler as an administrator to help protect me as a whistleblower in her division and to ensure that she was aware of the crimes and misconduct, in particular, by Michael Bender, who reports to her. In an effort to maintain an appearance of plausible deniability about the racketeering activities disclosed in my motion to Substitute Judge and open letter, Judge Dickler asked Brianna Steger to send me a threatening note to curb such disclosures to her. In this letter I was reprimanded for engaging in “ex parte” communication with Judge Dickler though I maintain I was not asking her to intervene through ruling but as an administrator to individuals she knows to be engaged in crimes of which I’m the victim. However it is my belief Judge Dickler wanted to assure that this motion would be unsuccessful and that these crimes and misdeeds not be made public so, rather than randomly assigning the hearing on my motion to substitute judge, she asked that it be assigned to Judge Matthew Link who she knows to be skilled at hiding evidence and obstruction of justice through his many years of conspiring to hide Ed Burke’s crimes in his role as an attorney for the city of Chicago. Judge Link heard my motion to substitute judge on January 11, 2022. My main basis was that Judge Johnson is biased against me as shown by past, current and ongoing ex parte communications intended to strategically benefit another party over me. My Petition was denied.

67. 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 been serving in the capacity of custody evaluator for a year, though he was originally appointed on Mr. Bender’s assurance that he could do

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a swift report, within four years. 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.
- f. 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.
- g. Dr. Blechman's preliminary "report" consists exclusively of pasting an incoherent screed from Mr. Matt received via email, according to Dr. Blechman's letter.
- h. 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:

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“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 Mr. Bender 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.
- 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. I believe as Cornel West has stated, “Justice is what love looks like in public”. 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.

68. Mr. Wehrman, Mr. Bender and Dr. Blechman conspired to retaliate toward me for testifying to Judge Link that the parties had conspired with Mr. Trowbridge in his efforts to obstruct justice, deny service and commit identity theft by looking on as officers of the Court and not intervening to stop crimes in progress. It is quite literally stated in the only “evidence” as the basis for an illegal revocation of parenting rights.

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69. Since being named as a defendant in this suit, Dr. Blechman, in conspiracy with Michael Bender, Steven Klein, Christopher Wehrman and Robert Johnson, has engaged in a specific scheme to impose illegal fees upon me for his own service and to extort me for payments not allowed under Illinois law.

- a. Under Illinois law 550 ILCS 604.10 b, **“The court shall order all costs and fees of the professional to be paid by one or more of the parties, subject to reallocation in accordance with subsection (a) of Section 508.”**
- b. At the time of his request to hire Gerald Blechman Mr. Bender said he was desirable because he is cheap, charging only \$4,000. Parties were ordered to pay 50% of this retainer by court order. No other order was entered regarding fees. No motion for fees has been made.
- c. At my first meeting with Dr. Blechman he presented me an invoice and I paid him \$2,000.
- d. On April 8, 2022, Dr. Blechman asked me to give him \$2,000. I wrote that I was confused and had already paid him. I asked him to please mail any invoice to my current address, which I provided in this email. Dr. Blechman wrote back “never mind”.
- e. Dr. Blechman has not sent me an invoice. No order for fees beyond the retainer, split 50% has been entered.
- f. In the document called Petition for Prospective Attorney’s Fees and For Allocation of Expert and GAL Fees, Mr. Wehrman in conspiracy with Mr. Klein write, “Through April 11, 2022, Peter Matt has paid \$8,900 to Dr. Blechman for Dr. Blechman’s appearance in this matter.”

- g. To my knowledge no invoice has been presented to Mr. Matt or to me, no order entered as frees so I can only interperet this transaction to be a personal payment by Mr. Matt through Mr. Wehrman and Mr. Klein, to influence an expert in testimony that is beneficial to Mr. Matt, which is to say a bribe.
- h. Curiously, Dr. Blechman also copied an email address, bender@caesarbenderlawcomcast.com, which is not Mr. Bender's email address of record. I suspect, as with the private thread through Kaye Mason, this is used in furtherance of actscriminal conspiracy.

Customs Unique to the Domestic Relations Division of the Circuit Court of Chicago

70. The Domestic Relations Division of the Circuit Court of Chicago has a number of unique customs, some of which are contrary to Illinois law. Illinois statute, 750 ILCS 5/506) (from Ch. 40, par. 506) regarding GALs reads:

a) Duties. In any proceedings involving the support, custody, visitation, allocation of parental responsibilities, education, parentage, property interest, or general welfare of a minor or dependent child, the court may, on its own motion or that of any party, appoint an attorney to serve in one of the following capacities to address the issues the court delineates:

(1) Attorney.

(2) Guardian ad litem. The guardian ad litem shall testify or submit a written report to the court regarding his or her recommendations in accordance with the best interest of the child. The report shall be made available to all parties. The guardian ad litem may be called as a witness for purposes of cross-examination regarding the guardian ad litem's report or recommendations. The guardian ad litem shall investigate the facts of the case and interview the child and the parties.

(3) Child representative. ...

(a-3) Additional appointments. During the proceedings the court may appoint an additional attorney to serve in the capacity described in subdivision (a)(1) or an additional attorney to serve in another of the capacities described in subdivision (a)(2) or (a)(3) on the court's own motion or that of a party only for good cause shown and when the reasons for the additional appointment are set forth in specific findings.

(a-5) Appointment considerations. In deciding whether to make an appointment of an attorney for the minor child, a guardian ad litem, or a child representative, the court shall consider the nature and adequacy of the evidence to be presented by the parties

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and the availability of other methods of obtaining information, including social service organizations and evaluations by mental health professions, as well as resources for payment.

In no event is this Section intended to or designed to abrogate the decision making power of the trier of fact. Any appointment made under this Section is not intended to nor should it serve to place any appointed individual in the role of a surrogate judge.

*(b) Fees and costs. The court shall enter an order as appropriate for costs, fees, and disbursements, including a retainer, when the attorney, guardian ad litem, or child's representative is appointed. Any person appointed under this Section shall file with the court within 90 days of his or her appointment, and every subsequent 90-day period thereafter during the course of his or her representation, a detailed invoice for services rendered with a copy being sent to each party. The court shall review the invoice submitted and approve the fees, if they are reasonable and necessary. Any order approving the fees shall require payment by either or both parents, by any other party or source, or from the marital estate or the child's separate estate. The court may not order payment by the Department of Healthcare and Family Services in cases in which the Department is providing child support enforcement services under Article X of the Illinois Public Aid Code. **Unless otherwise ordered by the court at the time fees and costs are approved, all fees and costs payable to an attorney, guardian ad litem, or child representative under this Section are by implication deemed to be in the nature of support of the child and are within the exceptions to discharge in bankruptcy under 11 U.S.C.A. 523.** The provisions of Sections 501 and 508 of this Act shall apply to fees and costs for attorneys appointed under this Section.*

71. In 2017 a Cook County mother reported Cook County Domestic Relations Division Guardian Ad Litem (GAL) David Pasulka to the disciplinary committee of the Illinois Bar (ARDC) because he told her that if she did not have sex with him he would make sure she never saw her children again. She denied him sex and he took away her children.

- a. Illinois law does not bestow the authority to “take away children” on GALs.. In fact the people and legislators of Illinois have anticipated abuses of authority and clearly mandated that GALs not act as surrogate judges or triers of fact. They are authorized to write a report, but Mr. Pasulka did not threaten to write a bad report, he threatened to take her children and was able to do so.

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- b. When the mother first reported the abuse Mr. Pasulka was not sanctioned by the ARDC or by his boss in the Domestic Relations Division, Presiding Judge Grace Dickler. No actions were taken for the next three years.
- c. David Pasulka was not just a GAL but for twenty years he headed a secretive committee that selects GALs, child reps and other lucrative appointees for the Domestic Relations Division and worked closely with Presiding Judge Grace Dickler. David Pasulka helped get the GAL Michael Bender, defendant and GAL to my children, his appointment.
- d. The GAL system in The Domestic Relations Division is a patronage system, with many attorneys and judges vying for a lucrative appointment as a GAL or child rep in the future. Domestic Relations judges and attorneys are economically incentivized to agree with GALs regardless of facts or of their client needs because of the potential for future appointments. Many judges, including Mr. Bender, become GALs after retiring from the Circuit Court.
- e. GALs in the Domestic Relations Division are given incredible power, not given by Illinois law. On January 12, 2021 I moved to have Michael Bender, a former Division judge, removed as Guardian Ad Litem because after a year of appointment, with my divorce final and no motions pending, he had never spoken to the children's doctors, teachers or therapists and I could not afford his bills. Judge Johnson, in denying my motion, rebuked me and said Mr. Bender was not just a great judge but a mentor and someone he had often had cause to seek out for advice. Judge

Johnson said Mr. Bender would stay on. I asked how long. He replied, “As long as Mr. Bender sees a need for his appointment”.

- f. A GAL is not authorized by Illinois law to appoint himself or to determine if his own appointment should last. The GAL statute in fact explicitly prohibits GAL from acting as surrogate judges and issuing rulings. It is a power given to GALs by the Domestic Relations Division under the authority of Grace Dickler and unquestioned by the attorneys and judges who work there.

72. In August, 2020 Mr. Pasulka was finally fired by Judge Dickler around the time he was indicted. On August 14, 2020 twenty eight female attorneys working as Domestic Relations Division attorneys wrote to Presiding Judge Grace Dickler to complain of endemic sexual harassment by male judges, attorneys and appointees toward female attorneys and staff. The abuses they listed included verbal abuse as well as sexual assault and rape. In the open letter Judge Dickler was asked by these attorneys to take action to fix the culture of sexual violence in her Division She has taken no actions. She has never reviewed the GALs appointed by a known sex offender to consider whether they are fit for their roles.

73. As a litigant who has spent years in her division I am aware of no safeguard or reporting systems for ongoing abuses by court appointees and judges. But I did try to make Presiding Judge Dickler aware of the abuses in my case, specifically ongoing crimes by officers of the court and a direct and explicit appeal to protect me as a whistleblower for reporting federal crimes, as is my right. So, as I had seen other parents and the 28 female attorneys do in the press, On November 21, 2021, I drafted an open letter to Judge Dickler copying Injustice Watch, my pastor and civil rights offices of the federal and state governments. After writing this I received a

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rebuke from Division Attorney Brianna Steger for initiating ex parte communication. She did not inform me of an alternate way to report crime and exploitation by GALs and judges to Presiding Judge Dickler. When litigants make a sincere effort to report abuse we are not just ignored we are chastised.

74. The judge assigned to my case from August 13, 2018 was Raul Vega, who was known within the division to be prone to rages and extremely misogynistic.

- a. When he was first assigned my attorney said, "Oh he's going to love you." I was advised by two attorneys to wear short skirts and high heels and to show cleavage because Judge Vega liked to see women's bodies. I was told by one attorney that their firm always sent their youngest, prettiest associates before Judge Vega because he likes to flirt with young female attorneys.
- b. At my first appearance before Judge Vega, represented by Mary Katherine Avery, I observed that Judge Vega did not follow any sequence of events or seeming order when attorneys spoke. Rather they had to interrupt and cross over each other. I observed that Judge Vega did not like to see female attorneys interrupt, but he did not give female attorneys time to speak. I observed that he would listen to men who raised their voice and interrupted but he chastised and female attorneys for being rude when interrupting.
- c. On multiple occasions Judge Vega winked at me. On one occasion he initiated a conversation with me from the bench when I was the first

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person in the courtroom after a morning recess. He smiled at me and asked me if I had spent my morning shopping.

- d. Shortly after my divorce was finalized on September 27, 2017, my ex husband filed a contempt allegation. As part of our divorce agreement I was required to sign a quit claim deed on our former marital home, which we had purchased with cash for \$450,000. As part of the same agreement Mr. Matt was required to remove me as the sole guarantor on \$600,000 in unsecured business loans for the business he now owned. Mr. Matt had not removed me as personal guarantor for his loans so I told him I would sign the quitclaim if he would keep it in escrow pending my removal from the loans. Mr. Matt sued instead. Initially, at hearing, Judge Vega heard my argument and was in agreement, preparing to deny the contempt allegation and draft an order to keep the quitclaim in escrow. Then I spoke out of turn and Judge Vega exploded, screaming at me that I needed to learn to keep my mouth shut. He found me in contempt of court and said if I did not sign the quitclaim before midnight that day he would imprison me. He also imposed crippling financial sanctions.
- e. Illinois law does not give Domestic Relations Division judges the authority to find women in contempt of court because they need to learn to keep their mouths shut. It is conferred upon them by the Domestic Relations Division policy of absolute judicial power.
- f. On November 30, 2021 I reported my experiences with Judge Vega to the editors at Injustice Watch. Jonah Newman wrote back to me and he

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informed me that other women had come to them and that his colleague Kelly Garcia was writing a story about Vega that was about to be published. When I read the piece a few months later many of the complaints were similar to mine.

- g. Judge Dickler was well aware of Judge Vega's tendencies and the risk of embarrassment they posed to her reputation so she removed him as a division judge while he was assigned to my case. Chief Judge Evans and Presiding Judge Dickler did not, however, report Judge Vega to the Illinois Judicial Board, and one would imagine that a report from two such prominent judges could have swiftly resolved the ethical issues. Instead they promoted Judge Vega to a leadership role as the Presiding Judge of the Domestic Violence Division of the Circuit Court of Cook County on August 13, 2018.
- h. There was no basis to promote Vega to a leadership role and hearing he, of all people, was selected to set policies that impact the most vulnerable women shocked me to my core and made me truly terrified of this Division.
- i. I believe it was Judge Evans' and Judge Dickler' hope that by not having as much contact with individual litigants like me Judge Vega would not bring bad publicity to the court. But Not long after his promotion Judge Evans ordered Judge Vega to take an early retirement after he was heard by another judge making offensive comments on a phone call.

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75. It is also my belief that Judge Dickler abuses her power to assign cases and violates the requirement that Circuit Court cases be assigned randomly. For example, I do not believe that my petition for substitution of judge was randomly assigned to Judge Matthew Link. Relatively new to the bench, Judge Link previously spent eight years working as legal counsel for the City of Chicago under the direction of Alderman Ed Burke. It is my belief that Judge Dickler assured that my petition would be heard by someone with a demonstrated history of keeping the city's ugly secrets from the public. Judge Dickler also has the power to assign "lucrative" cases to preferred judges. For example, the average annual income in Chicago is around \$31,000. The average annual income in my family's zip code, 60091, is \$161,000. I do not believe that Micahel Bender, by way of Judge Johnson, randomly gets assigned to the "good cases", which is to say a case where one or both parties have money, like mine.
76. The most effective and consistent policy in the Division to empower Judicial Abuse is the absence of any way for a party who is not in favor with a judge to schedule a hearing on urgent matters. In this way a judge may maintain a bizarrely biased position without being troubled with a paper trail showing contrary facts. This is known to Legal Aide who, through staff at CARPLS, which is their service to support pro se and indigent litigants. When I asked a staff member how to schedule a hearing, she said, "Well that is a problem." The only way is through the Court's scheduler. In my case I am forced to schedule through Kaye Mason whom I have quite publicly and loudly accused of corruption since at least six months ago. (Exhibit V).

Continued Denial of Constitutional Rights by Iris Martinez

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77. The office of Clerk Iris Martinez has a number of unique customs that foster seemingly inevitable civil rights violations and the opportunity to defraud members of the public

- a. Clerk employees are allowed to email litigants anonymously, using shared email addresses and on a multitude of occasions they have refused to provide contact information when requested.
- b. Clerk employees in the Domestic Relations Division of the Circuit Court are also permitted to remove their names from the logs of online events on Odyssey File. For example, if a clerk in the Appellate Court accepts and stamps a motion in Odyssey File (they use the same software), the name of the Appellate Court employee appears on the confirmation email. Circuit Court Clerk employees' names are not visible to users and we receive their stamped copies anonymously.

78. Clerk employees tell members of the public they have escalated their problem to a supervisor when they have not. (Exhibit W).

79. Although I believe defendants in this case conspired to interfere with my service contact in 2020, since that time my service contact remains bizarrely corrupted and exhaustive efforts to fix my contact information have been unsuccessful. As of this writing, my service contact in Odyssey File is Megan Matt, represented by Alexandra Brinkmeier and three unknown parties at 423 Linda Avenue in Chicago, Zip code 68091. In fact my name is Megan Mason. To be fair my married name, Matt, is often used in the division documents and it is customary in court filings, but for mailing service it is not accurate. My address is no longer on Linden and never was on Linda, that is not my zip code, Ms. Brinkmeier is no longer my attorney and never represented me with other counsel so I have no idea who the other names are indicated by +3 more.

- a. On the afternoon of February 10th I visited the Record Division of the Circuit Court of Cook County. I spoke to Ms. Chevon Edmondson and who brought over her supervisor, Ms. Laurie Garner. I asked Ms. Garner for contact information for

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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 told Ms. Garner that my prior attorney changed my mailing address. She said “How do you know it was your former attorney?”, and smirked and raised her eyebrow.

- b. 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.
- c. On the evening of February 10th, 2022 I logged into Odyssey File again and noticed the corrupted primary service contact by expanding the field with Ms. Brinkmeier’s name. The full service address and other details were not visible from the home screen so I do not know when, between November 11, 2021 when Ms. Brinkmeier withdrew, and that day someone had changed the details as described above or how.
- d. Ms. Brinkmeier had previously listed a phone number in her contact information and her firm’s address: 180 N Stetson Ave Ste 1300, Chicago, IL 60601 and she had no other attorneys listed when working for me.
- e. On this same date I wrote to Ms. Brinkmeier to ask if she could please remove the contact.
- f. On this same date Ms. Brinkmeier wrote back and affirmed that her contact was indeed altered in the Odyssey File 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.

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- g. On March 23, 2022 I wrote to Iris Martinez personally using certified mail, asking her to intervene to correct my service contact and to allow me access to the services of the Clerk's office. I have received no response.
- h. Through an online search, for the first time I learned there existed an Office of the Inspector General for the Clerk, now headed by James Murphy-Aguilu. I wrote to Mr. Murphy-Agilu on March 29th, 2022. Shaun Hallinan, Deputy Chief of the Inspector General wrote back that case number 2022-3-145 had been opened. I have heard no response since.
- i. My primary service contact still shows the fake address entered by Brad Trowbridge in March of 2022 under Ms.Brinkmeier's name. I believe the changes were made by someone in the clerk's office in an attempt to support Brad Trowbridge's ridiculous claim that there was some kind of computer bug or software failure . Or, perhaps, simply as a nasty joke on me. I can state with certainty that the change was not made by a well meaning civil servant legally performing his or her duty.

80. Iris Martinez has demonstrated profound negligence in failing to provide data and identity security for online users of Odyssey File and a wanton disregard for the well being of pro se litigants in general and toward me personally.

81. Iris Martinez must have authorized the settings within the software provided by Odyssey File to allow her employees to act with what they believe to be anonymity. This is to say, it's obvious that the Odyssey File software can show the clerk's name when correspondence or confirmations are generated because the Appellate Court does this using the same software. Furthermore it is obvious that the software was designed to show the name of a person taking an action within the audit trail because there is a field to display the user's name, blank for Domestic Relations Division Circuit Court employees. I would imagine that there is in fact an audit trail that shows

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which events in the system were performed by which employee user, assuming employees are required to use unique logins as would be required by any other employer. But by not showing the employee name in the confirmation, I as a member of the public cannot see who is sending me messages within the software, such as an explanation for rejecting my pleadings.

82. On ten to fifteen occasions I have had pleadings rejected by clerk employees in an effort to block my access to justice. These acts were all performed by employees whose names were not visible to me. The file name of each pleading included an accurate pleading type (eg “motion”), the pleadings were often made on Legal Aide templates and forms approved by the court and with the name of the type of pleading prominently displayed at the top. In other instances the name of the pleading was typed by me in all caps at the top of the document (eg “PETITION”). In all cases the type of pleading selected from the drop down menu for filing type in Odyssey file corresponded to the name of the pleading and title displayed on the form or document. In all cases they were rejected with a note from an anonymous user, “file type does not match file submitted”. This occurred seven times on March 21, 2022. I then email Briana Steger, who tells me to stop emailing her, and somehow the filings get through.

83. The identity theft described as part of the Bender Syndicate scheme to have me fraudulently found in contempt without my awareness was enabled by Iris Martinez’s failure to protect my identity.

84. Iris Martinez’s failure to protect my identity singles out a specific cast of litigants, pro se litigants. This is because attorneys regularly use Odyssey File, know what a docket is and look at it, so it would be difficult to change or present to be an attorney without their awareness.

85. By extension of discrimination against pro se litigants, this policy also unfairly discriminates against several protected classes of litigants who are disproportionately unable to afford representation and against the poor and indigent in general.

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86. A significant and impactful policy of Iris Martinez's office is systematic denial of access to the appeals process whereby her employees aggressively seek to intimidate litigants from appealing circuit court rulings. In this way the reputation of the Division is protected and abusers remain in power confident that their rulings will not be held to scrutiny by another judge with different motivations than his or her colleagues in the Division.

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".

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.
- l. The week of February 28th, 2022 I received a call from Ms. Janice Thompson who works for The Clerk of the Circuit Court of Chicago, preparing the record on appeal for the Appellate Division. Ms. Thompson informed me that she had received the request to prepare the record on appeal on Monday, February 28th, 2022. She confirmed that I had filed the request on January 24th, 2022 and committed no errors. She said that due to mistakes by Clerk employees she did not get the request to prepare the record on Appeal until February 28th, 19 days after the deadline to have it transferred to the Appellate Court. (Exhibit JJ).
- m. It is impossible for the average pro se litigant to file an appeal using the standard processes in Iris Martinez's clerk's office.

Urgent concerns

87. I fear that ongoing crimes and civil rights abuses endanger me and my family. Specifically, on July 5th, having been active personal in this matter for two months without recusing themselves, parties are seeking to seize my property, to estrange me completely and permanently from my children and, I believe, to imprison me. Mr. Wehrman and Mr. Bender are seeking to take my children away in retaliation for my whistleblowing activity and in an effort to “resolve” my case before it is assigned to another judge who may not be corrupt, before Mr. Bender and Dr. Blechman can be made to submit written reports and testify under oath and cross

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examination, before I may have an opportunity to call in my own witnesses and submit my own evidence. All actions are being taken without a single pieced of supportive evidence, a similar witness who is not a defendant in a racketeering conspiracy lawsuit with mel. No notice was given, it was originally served instanter. This is utterly contrary to Illinois Law and yet I am almost certain Judge Johnson will take my children away as directed to do by Mr. Bender unless swift intervention is made to protect us.

- a. In very rare situations there might be reason to temporarily remove children but in this case there is no DCFS or doctor report, no genuine allegation of abuse and no admissible evidence to support an emergency motion to take my children away.
- b. Such an action would be profoundly cruel to both my children, particularly A.D.M. who is highly dependant on me for his emotional support and who has few close relationships due to his behavioral and developmental challenges. Furthermore he has a difficult time understanding time and would not understand that the loss of his mom is temporary.
- c. The only evidence provided by parties is the Blechman Letter which does not contain any facts demonstrating contempt and which pointedly seeks to highlight my whistleblowing activity. As of this filing I do not know if or when an order may be entered taking away my children without a hearing or notice. I do not have any faith in the protection of my family in the Circuit Court of Cook County.
- d. Specific reference is made to this case, to my status as a federal witness as a basis for the retaliatory actions requested.
- e. Because of, in particular, Judge Johnson's refusal to recuse himself from this case as a litigant I have been put in an impossible position. I have most forcefully,

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truthfully and, I believe, reasonably, stated a claim that Judge Johnson and others have engaged in abusive and retaliatory behaviors that violate federal law. As a citizen I have a right to forcefully ask another citizen to cease the violation of federal law. But it is utterly inappropriate for me to have to address a judge at all, much less to ask him to cease criminal activity.

88. This abusive litigation has been happening for six years. When I left my ex husband my younger son was four years old and my older son, as is the case now, required constant care due to his disabilities. Now I find myself insolvent, in \$80,000 in high interest debt and facing judgments against me that I fear, because they are classified as child support obligations, might literally force me into incarceration.

89. From the time the children and I first left Mr. Matt in August, 2006 I have had to find a way to support my children and myself with no family support and while under constant, expensive vexatious litigation by Mr. Matt. For the first five years of my separation and divorce my average income was under \$50,000. But I earned a Series 7 license and built a career for myself, a good job with flexibility and good health care for the children. My income grew to over \$120,000 annually. And now my career is jeopardized and my income potential seriously impacted by these abuses.

90. I am devastated and humiliated by the loss of my most basic civil rights and in fear for my family's and my own safety and well being. I fear for the women and children of Illinois if someone does not help us.

VI. CLAIMS

42 U.S. CODE § 1983 CLAIMS

91. Color of Law violation under 42 U.S. Code § 1983 occurs when, "*Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State,*

Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States”.

Claim 1 The Clerk of the Circuit Court of Cook County et al violated my civil rights under the color of state law.

92. I incorporate the preceding paragraphs by reference as if fully rewritten herein.

93. Defendants at all times relevant to this action were acting under color of state law.

94. Defendants Iris Martinez and Dorothy Brown, personally and as consecutive Clerks for the Circuit Court of Cook County during my lengthy involvement with the Division of Domestic Relations, Bradley Trowbridge, Michael Bender and Laurie Garner, unlawfully deprived me of my right to a unique digital identity as protected by The First Amendment of the Constitution of the United States of America.

95. Defendants Iris Martinez and Dorothy Brown, personally and as consecutive Clerks for the Circuit Court of Cook County , Bradley Trowbridge, Michael Bender, Laurie Garner, and Christopher Wehrman unlawfully deprived me of my right to due process in the form of notification of service as protected by The Fourteenth Amendment of the Constitution of the United States of America and as specifically prohibited by Illinois Law(720 ILCS 5/31-3) (from Ch. 38, par. 31-3) which prohibits obstruction of service. Their action also led to the illegal seizure of my personal assets, my money, due to sanctions based on fraud enabled by The Clerk of the Circuit Court of Cook County.

96. At all times relevant hereto, Defendants acted pursuant to a policy of The Clerk of the Circuit Court of Cook County of failing to verify and protect the digital identities of pro se litigants and failure to protect the privacy and accuracy of digital records.

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97. The Clerk of the Circuit Court of Cook County failed to adopt clear policies and failed to properly train its clerks to provide support to all litigants, to maintain the integrity of digital records and to act with transparency and professionalism

98. Defendant County's policy or custom, and its failure to adopt clear policies and failure to properly train its clerks and to protect digital privacy, were a direct and proximate cause of the constitutional deprivations suffered by me and my children.

Claim 2 The Circuit Court of Cook County violated my civil rights under state law

99. I incorporate the preceding paragraphs by reference as if fully rewritten herein.

100. Defendants at all times relevant to this action were acting under color of state law.

101. Defendants Grace Dickler, Timothy Evans, Robert Johnson, Michael Bender, Bradley Trowbride and Christopher Wehrman, Steven Klein and Kaye Mason unlawfully deprived me of my right to equal protection under the law as protected by The Fourteenth Amendment of the Constitution of the United States of America through repeated and persistent gender discrimination and harassment.

103. Under The McDonnell-Douglas framework gender discrimination can be shown where there is a clear pattern of two similarly situated individuals receiving disparate treatment due to an identifiable association of one party with a protected class. Mr. Matt is a man. I am a woman. We are both litigants, both parents, named as parties in the same divorce suit. Our disparate treatment has been voluminously demonstrated in the following ways:

- a. Mr. Matt is allowed to file pleadings and have them heard and ruled upon. I am not generally allowed to file pleadings and have them ruled upon.

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- b. Mr. Matt has violated the parenting plan many times and has not received any sanctions or contempt findings. I have not violated the parenting plan and I have received three findings of contempt and multiple sanctions.
- c. Mr. Matt has been legally served all filings and court dates. I have been denied service on at least five documented occasions.
- d. Mr. Matt is allowed to break the law. I do not break the law.
- e. Mr. Matt is allowed to have legal counsel. I cannot have legal counsel because no attorney will work with me due to no fault of my own.
- f. Mr. Matt has service information in the official Clerk record reflecting his actual identity and actual legal representation. I have service information in the official Clerk records that is fraudulent and Ms. Martinez personally, willfully, refuses to correct it.
- g. There are clear gender disparities in the Domestic Relations Division of the Circuit Court of Cook County that benefit Mr. Matt and harm me as a woman.

104. Defendants John Palen, Michael Bender and Christopher Wehrman for violation of A.D.M.'s rights under the Americans With Disabilities Act of 1990 which provides for equal access to state programs. By exploiting A.D.M.'s disability status in Mr. Matt's Disability Fraud Scheme, namely claiming to gift a business to A.D.M. in order to defraud business partners out of contracts and then to later steal the gift back from A.D.M. they discriminated against him due to his disability status. Perhaps the most important outcome of this lawsuit will be the thorough discovery of any conflicts of interest or other schemes by which these parties are or plan to exploit A.D.M. further. I believe his personal safety may be in danger.

105. Defendants Gerald Blechman, Robert Johnson, John Palen, Michael Bender and Christopher Wehrman for violation of my First Amendment right to freedom of religion, which

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includes a passionate and spiritual belief in social justice. The defendants did this by presenting my statements about my faith in democracy to impugn my reputation and infer mental defect. They did this by issuing a factless contempt finding based only on the letter impugning my reputation (by hearsay). And they persist doing this even as I write this Complaint by attempting to completely sever my relationship with my children, my most important, precious relationship, in retaliation for my statements of faith about the pursuit of justice.

106. At all times relevant hereto, Defendants acted pursuant to a policy of The Domestic Relations Division of the Circuit Court of Cook County of granting absolute power to division GALs and judges, which allows for the exploitation of vulnerable people in the system, for maintaining an environment that is discriminatory and hostile to women, and by hiding abuse and misconduct by judges instead of reporting them to The Judicial Inquiry Board.

107. The Domestic Relations Division of the Circuit Court of Cook County failed to adopt clear policies and failed to properly train and supervise division judges and appointees to prevent sexual harassment and abuse. The Division also failed to put in basic systems for reporting and monitoring abuse and actively discouraged litigants from bringing misconduct to Judge Dickler's attention.

108. The Circuit Court of Cook County's policy or custom, and its failure to adopt clear policies and failure to properly protect vulnerable people and enforce Illinois and federal law, were a direct and proximate cause of the constitutional deprivations suffered by me and my children.

Claim 3 under The Bender Syndicate engaged in a pattern of racketeering activity under RICO § 1962(c)

109. I incorporate the preceding paragraphs by reference as if fully rewritten herein.

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110. This Claim is against Defendants Michael Bender, Bradley Trowbridge, Robert Johnson, Christopher Wehrman, Gerald Blechman, John Palen, Grace Dickler, Steven Klein, Matthew Lihnk and Kaye Mason (the “Bender Syndicate”).

111. The Bender Syndicate is an enterprise engaged in and whose activities affect interstate commerce. The RICO Defendants are employed by or associated with the enterprise. The RICO Defendants agreed to and did conduct and participate in the conduct of the enterprise’s affairs through a pattern of racketeering activity and for the unlawful purpose of intentionally defrauding me. Specifically: The parties conspired in acts of identity theft and using a false access device (email) to steal an identity by using a fake email to change my court mailing address; in multiple acts of wire fraud through emails intended to deceive me and distract me from action being taken against me in court; in contributing to the delinquency of a minor by conspiring to engage A.D.M., a minor child, in Mr. Matt’s disability fraud scheme; in money laundering by receiving payments from Mr. Matt they know to be ill gotten; in multiple acts of obstruction of justice by blocking a Motion for Allocation of fees in order to hide Mr. Matt’s and parties’ financial crimes, by suppressing doctors’ reports of child abuse, by hiding Mr. Matt’s psychological tests; in acts of witness retaliation including efforts to completely sever my relationship with my children in punishment for prior testimony regarding parties; in multiple acts of conspiracy to deprive me of my rights, including my right to due process and protection from unreasonable seizure of my property in the form of financial sanctions which have destroyed my finances and bankrupted me. These parties even now continue to perform frequent federal criminal acts in the form of witness intimidation and obstruction of justice in their state court actions. In fact I would go so far as to suggest that any activity a party named as a

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defendant in this suit has taken since May 3, 2022 when this was filed, cannot be legitimate and are wholly criminal.

112. Pursuant to and in furtherance of their fraudulent scheme, Defendant(s) committed multiple related acts of wire fraud, money laundering, witness tampering and retaliation toward a witness.

113. The acts of wire fraud, money laundering, witness tampering and retaliation toward a witness set forth above constitute a pattern of racketeering activity pursuant to 18 U.S.C. § 1961(5).

114. The RICO Defendants have directly and indirectly conducted and participated in the conduct of the enterprise's affairs through the pattern of racketeering and activity described above, in violation of 18 U.S.C. § 1962(c).

115. As a direct and proximate result of the RICO Defendants' racketeering activities and violations of 18 U.S.C. § 1962(c), I have been injured in my business and property in that: I have lost time and energy to focus on my business which is wholly engaged in interstate commerce. I have lost revenue, or about 50% of earnings potential. The fraudulent pattern of racketeering activity has directly led to my bankruptcy which has destroyed my reputation and seriously reduced my earning potential and marketability. I have also paid about \$150,000 in direct legal costs, sanctions and extra fees imposed by Mr. Matt and the Court. The minor children have lost a quality of life due to the financial pain imposed on them through their mother.

116. WHEREFORE, Plaintiff requests that this Court enter judgment against the RICO Defendants as follows: Treble damages including lost income, lost future earnings, loss of reputation, direct fees and sanctions and legal fees and costs. As a pro se litigant I ask the Court,

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perhaps through the appointment of pro bono counsel, to assist in determining the appropriate damages in this case. I provided an estimate based on a conservative amount that I thought might be a good basis for negotiating settlement but I believe the damages allowed under law are considerably higher than the \$20,000,000 requested. In the case of my earnings, Blake Mckenzie, Complex Head for Morgan Stanley Deerfield, my former boss and Bob Peyreigne, my current boss and head of Global Wealth Management at Jefferies, have both indicated that they expect me to earn about \$400,000 per year within the next two to three years. As I am forty five, this would amount to about \$8,000,000 over the next twenty years. Treble \$8 million would be \$24,000,000. But this amount does not reflect damages pain and suffering allowed under civil rights violations, damages to the children, direct legal costs imposed by fraud and others. This is why I believe \$20,000,000 is a conservative amount at which to start negotiation.

VII. Prayer for Relief

A. Trial by jury is requested on all Claims

PRELIMINARY INJUNCTIVE RELIEF SOUGHT.

B. I pray this Court intervenes swiftly and decisively to protect my and my children's safety and well being. I am submitting by separate motion a request for preliminary injunctive relief. I specifically pray that this Court:

1. Order all defendants to recuse themselves or withdraw from any involvement in the underlying Circuit Court case 2016 D 9534 immediately.

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2. Temporarily prohibit the minor children, A.D.M. and T.M.M. from leaving the United States until at least such time as the complaints raised here have been resolved by trial or by separate agreement.
3. Immediately order Presiding Judge Grace Dickler to transfer the Domestic Relations Case 2016 D 9534 to adjoining Lake County in the interest of justice, at the expense of the Circuit Court of Cook County.
4. Permanently prohibit any individual named as a defendant in this suit from serving as trustee, guardian, executor or any other position of legal, financial or physical authority over the minor children A.D.M. and T.M.M. either individually or through trusts, businesses. and/or other entities associated with the children or the defendants.
5. In the event that any individual named as a defendant in this suit has already been hired, named or appointed in any capacity named above that this individual discloses the nature of their appointment to the Court.
6. Order all parties to disclose any life insurance policies, businesses, trusts or other assets or financial instruments owned by the minor children A.D.M. or T.M.M. that they are aware of even, if they have no controlling or beneficial interest in such vehicles.
7. Order Iris Martinez to correct my service contact information and to provide to me the name, phone number and email address of an individual in her employment to whom I can report future problems with software, service information or electronic filing.

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8. Order Iris Martinez to immediately stop the practice of anonymous filings and emails by her staff, requiring clerk employees to use their full legal name in any court correspondence and to use their full name in the log of any online filings. Order Iris Martinez to require employees in her office to disclose their name and position when asked.

OTHER RELIEF SOUGHT

- C. Order that the Domestic Relations Division of the Circuit Court of Cook County immediately put in place the following necessary policies with regard to Domestic Relations Division Court Appointees:
 - a) Order all judges in the Domestic Relations Division of the Circuit Court of Chicago to comply with Illinois law with regard to the basis for appointment, role, scope, and authority given to individuals appointed by the Court under **(750 ILCS 5/) Illinois Marriage and Dissolution of Marriage Act**.
 - b) Allow any litigant, pro se or represented by an attorney, to request a civil rights witness be in attendance at any meeting with Court employees or appointees, including but not limited to judges, clerks, Guardian Ad Litem, Custody Evaluators and Parenting Coordinators. Further, to order that should a litigant invoke his or her right to have a witness in attendance that this invocation not be used to disparage the litigant in any formal or informal reports to the Court.

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- c) Prohibit any current or past Cook County Circuit Court judges from serving as Guardian Ad Litem, child representatives or any other Court appointed family law specialist or advocate.
- d) Order that any retired Cook County Circuit Court judges currently serving as Guardian Ad Litem or child representatives be removed within thirty days.
- e) Create a formal, transparent system for reporting, monitoring and addressing reports of abuse and crimes by Domestic Relations Division appointees and judges to the Presiding Judge.

D. I pray that this Court award damages to A.D.M. for:

- a) Pain and suffering due to court's interference with his right to association with his mother;
- b) Pain and suffering due to actions by defendants Trowbridge, Palen, Bender, Klein and Wehrman to empower his father to exploit him financially and legally;
- c) Ongoing therapy costs;
- d) Loss in quality of life due to financial abuse of his mother, which has limited funds available for his medical needs, entertainment, cultural activities, clothing and care.

E. I pray that this Court award damages to A.D.M. for:

- a) Pain and suffering due to interference with his right to association with his mother;
- b) Ongoing therapy costs

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- c) Pain and suffering due to actions to obstruct investigation into claims of child abuse;
- d) Loss in quality of life due to financial abuse of his mother, which has limited funds available for his medical needs, entertainment, cultural activities, clothing and care.

F. I pray this Court award damages to me, Megan Mason for:

- a) Lost business income due to time spent on legal harassment, litigation and attempts to stop civil rights and criminal abuses;
- b) Lost future earnings due to impending devaluation of and potential loss of financial service license;
- c) Loss of reputation;
- d) Legal fees imposed due to fraudulent acts or paid to attorneys who committed fraud while purporting to act in my interest;
- e) Sanctions imposed due to fraudulent acts;
- f) Fees ordered to be paid to Mr. Bender, Dr. Palen and Dr. Blechman;
- g) Interest incurred on high interest loans I was forced to borrow as a result of fraud;
- h) Loss of reputation as an educator due to defamatory and baseless allegations of medical neglect and unfit child rearing decisions.

This is relevant because if I lose my financial securities license, a natural job market for me is normally as a teacher or administrator in a school setting because I hold a Masters degree in Education.

However, The Bender Syndicate has destroyed my reputation as an educator.

- i) Pain and suffering due to six years of harassment and abuse caused by the decision makers of the Domestic Relations Division of the Circuit Court of Chicago.
- j) Pain and suffering due to three years of abuse by The Bender Syndicate and all parties involved;
- k) Pain and suffering due to the denial of justice and dignity by the Clerk of the Circuit Court of Cook County;
- l) A loss of quality of life over six years as Mr. Matt has used the harassment described here to depict me to neighbors, family members, educators at our childrens' schools, coaches, therapists, doctors and any other mutual contact to describe me as a crazy, unfit mother who the Court is forced to curb with the appointment of a GAL and other sanctions. People assume there is something wrong with my conduct, my mental health or my criminal history that requires intense court intervention because it is much easier to believe a one woman is crazy than that a court division in our nation in 2022 is corrupt;
- m) This nation promised me full protection of the Constitution, I want that restored.

G. Whatever further relief and protection the Court deems fit and is able to provide me and my children.

H. Whatever intervention this Court may make to restore justice to the families of Cook County Illinois who may be subject to the Domestic Relations Division of the Circuit Court of Cook County and Clerk of the Court. I ask that this Court please make sensible consideration on the impact of the abuse I have described on individuals for whom English is a second language, individuals who are unsophisticated about the law, to vulnerable people of all kinds. Consider the added stress such abuse brings to families struggling with poverty and addiction and generational violence. Consider the impact of this type of judicial abuse on vulnerable children. The people of Illinois have given these defendants tremendous power over precious children and families. With great power comes great responsibility. However I see a shocking lack of accountability, or frankly even any sense of shame, among the individuals working in the institutions in charge adjudicating matters impacting Chicago and Chicago area families. This must change. Please help us.

Respectfully Submitted by

/s/Megan Mason

Megan Mason, Plaintiff Pro Se

June 20, 2022