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7/5/2022 12:00 AM  
IRIS Y. MARTINEZ  
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION**

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

Case No. 2016 D 009534

**MOTION TO DISMISS PLAINTIFF’S: MOTION TO MODIFY PARENTING TIME; RULE 137  
PETITION FOR SANCTIONS; MOTION FOR QMSO; MOTION FOR RULE 215 EXAM AND  
ANY OTHER PENDING MATTERS PENDING BY PETITIONER**

I, Megan Mason, acting as defendant pro se in this matter, move to dismiss the three pleadings filed in the Circuit Court of Cook County in this matter on April 28, 2022 entitled Motion to Modify Parenting Time and Allocation of Parental Responsibilities; Rule 137 Petition for Sanctions and Motion for Qualified Medical Support Order. I also move to dismiss a motion called Motion for Rule 215 Exam which I received by email on June 28, 2022.

I also move to dismiss any other pending matters brought by Mr. Wehrman and/or Mr. Klein to this court.

**Basis to Dismiss all Pleadings**

1. There is a profound conflict of interest between plaintiff’s counsels Mr. Christopher Wehrman and Mr. Steven Klein and myself, defendant, my minor children, A [REDACTED] and T [REDACTED], and in fact between parties and Plaintiff Peter Matt. Mr. Wehrman and Mr. Klein are defendants in federal suit 1:22-CV-2315 (Exhibit A) in which both individuals are personally alleged to have committed multiple acts of fraud against me and the minor children A [REDACTED] and T [REDACTED].
  - a. Both individuals have known that I am suing them for several months and reference my suit at the federal level in their pleadings.

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- b. All pleadings were drafted with the cynical and exclusive purpose of intimidating me as a federal witness against them.
  - c. These same two individuals are under investigation by federal law authorities for multiple acts of fraud and corruption and it is my understanding that they have both been questioned by federal law enforcement regarding these matters. Therefore, they know they are criminal suspects as well as civil defendants, in a suit in which I and my children are named as victims.
  - d. On the face of it these two individuals ought not to be acting as attorneys in a lawsuit in state court wherein a party, myself, is also the victim named in a federal lawsuit and active litigation is proceeding in the federal lawsuit.
  - e. It would be impossible to determine if any of these individual acts in the form of pleading are in personal service to hide alleged crimes and to intimidate me as a federal witness or if they are legitimate legal acts.
  - f. Therefore, any pleading before this court brought by plaintiff ought to be dismissed until such time as plaintiff can obtain counsel in accordance with the legal and ethical requirements of an Illinois attorney.
2. Mr. Wehrman committed fraud in many of these documents and in his communications related to these pleadings. They ought to be dismissed en masse because where fraud has occurred it is impossible to discern what is legitimate in a document. Namely, since about February, 2022, Mr. Christopher Wehrman has used a fraudulent mailing address in court filings and communications with me.
- a. In the affidavit affixed to Plaintiff's MOTION TO DISMISS PLAINTIFF'S: MOTION TO MODIFY PARENTIING TIME; RULE 137 PETITION FOR SANCTIONS and MOTION FOR QMSO, Mr. Wehrman drafted a business address, 410 N. Michigan Ave., Suite 400 in Chicago, that he has never used, which is to say fraudulent.

- b. In his email signature Mr. Wehrman has indicated for five months that his business address is 410 N. Michigan Ave., Suite 400 in Chicago. This is not true and has never been true.
        - c. Mr. Wehrman knew he had no business address at 410 N. Michigan when he drafted this email signature and did so fraudulently.
        - d. In these pleadings Mr. Wehrman also stated under threat of perjury that his address is 410 N. Michigan Ave., Suite 400, while knowing that he has never used this address for legitimate businesses. It was at the time of these filings the address of Oil Dri, a mineral company.
3. All pleadings before this court brought by plaintiff ought to be dismissed and stricken because none is supported by facts or evidence.
  - a. None of the pleadings before this court on behalf of Petitioner Peter Matt are supported by legitimate evidence or statement of fact and all are on the face of it substantially insufficient in law.
  - b. None of the pleadings state an actual fact which would form the basis for profound financial penalties, sanctions and destruction of parental rights. In these documents there are inferences and generalizations but no actual fact to support the serious claims.
  - c. None of the pleadings are legitimate or worthy of Court time and resources.
4. Illinois law regarding parentage is clear and thorough and none of the pleadings are in accordance with Illinois law.
  - a. Mr. Michael Bender, also named as a defendant in the federal civil suit and also, to my understanding, being actively questioned and investigated by federal law enforcement agents, has worked as a Guardian Ad Litem to minor children and federal plaintiffs A [REDACTED] and T [REDACTED] for three years.
  - b. Mr. Bender was tasked to provide a report to the court on the minor children three years ago and has still not done so.

- c. Mr. Bender also instructed the Court to order his friend Gerald Blechman, also a federal civil and criminal defendant, appointed as custody evaluator. Dr. Blechman has served as Custody Evaluator for a year and has still not submitted his report.
- d. Both parties were required to submit their reports in accordance with Illinois law with which this court is well familiar and to then be available for cross-examination, alternate expert witnesses and other acts that would signify a trial of fact in a legitimate court of law. Pleadings related to parentage and custody should not be considered in advance of such time.
- e. One document, a letter from Dr. Gerald Blechman, also named as a defendant and co-conspirator and also under federal investigation for the crimes named in federal suit 1:22-CV-2315, has been offered as evidence for some of the pleadings. This document is called a “preliminary report” from a custody evaluator. Illinois law is clear about what is required in a custody evaluator report and this bizarre document does not meet those standards and is wholly comprised of inadmissible hearsay.

Therefore I ask that this court:

- 1. Dismiss and strike all pleadings by Mr. Matt presently before this court;
- 2. Immediately disqualify Mr. Christopher Wehrman and Mr. Steven Klein as attorneys in any case in which Megan Mason, A [REDACTED] T [REDACTED] or Peter Matt are litigants;
- 3. Order that Michael Bender be removed as Guardian Ad Litem effective immediately;
- 4. Order that Gerald Blechman be removed as Custody Evaluator, effective immediately.

Respectfully Submitted by,

/S/Megan Mason

Megan Mason, Defendant Pro Se

