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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

**RESPONDENT’S MOTION TO DISMISS DEFENDANT’S MOTION TO MODIFY  
PARENTING TIME AND ALLOCATION OF PARENTAL RESPONSIBILITY**

I, Megan Mason, defendant pro se, move that this court dismiss petitioner’s Motion to Modify Parenting Time and Allocation of Parental Responsibility.

1. On April 28th, 2022, Petitioner filed a Motion to Modify Parenting Time and Allocation of Parental Responsibility with no notice given and without any legally allowable evidence in support of the claim (Exhibit A).
2. Under 735 ILCS 5/2-615 a party in Illinois may move to have a pleading dismissed where that pleading is substantially insufficient under the law.
3. Specifically petitioner’s Motion to Modify Parenting Time and Allocation of Parental Responsibility should be dismissed because it is substantially insufficient under the law in the following ways:
  - a. Plaintiff’s claims are not supported by evidence. Under Illinois law 750 ILCS 5/610.5:

*“Except in a case concerning the modification of any restriction of parental responsibilities under Section 603.10, the court shall modify a*

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*parenting plan or allocation judgment when necessary to serve the child's best interests if the court finds, by a **preponderance of the evidence**, that on the basis of facts that have arisen since the entry of the existing parenting plan or allocation judgment or were not anticipated therein, a substantial change has occurred in the circumstances of the child or of either parent and that a modification is necessary to serve the child's best interests."*

- b. Proving a proposition by the preponderance of the evidence requires demonstrating that the proposition is more likely true than not true. Because this motion to completely revoke my parenting rights five years after a duly enacted Illinois divorce and parenting plan is supported by no evidence it would be impossible to form a conclusion that the plaintiff's motion is supported by a preponderance of evidence.
- c. Plaintiff's claims are not based in facts nor does plaintiff refer to facts in the pleading.
- d. No teacher, therapist, doctor or other party familiar with the children's well being has presented testimony or evidence in support of this motion.
- e. A custody evaluation was ordered on a prior date and the findings of that evaluation, specifically multiple psychological examinations, pediatrician reports, teacher reports, and other information relevant to the children's well being have not been considered.
- f. Illinois law allows for the presentation of alternate experts as well, having received no custody evaluation, I have not had the opportunity to provide an alternate evaluation.

- g. Plaintiff's counsel filed this pleading using a fraudulent business address, stating in his affidavit that his place of business is 410 N. Michigan Avenue, Suite 400 in Chicago, which is not his business address and never has been. This violates Illinois Code of Civil Procedures Rule 131 d..
4. Dismissal of plaintiff's Motion to Modify Parenting Time and Allocation of Parental Responsibility is the only appropriate action under the law.
  5. Under no circumstances should plaintiff's pleading be ruled upon until such time as parties who have a legal and ethical duty to remove conflicts of interest step down. Namely, the following parties are presently defendants or witnesses in ongoing federal criminal investigations into crimes in which I and my minor children are victims and witnesses: Judge Grace Dickler, Judge Robert Johnson, Kaye Mason, Christopher Wehrman, Steven Klein and Michael Bender. (Exhibit B).
  6. Multiple parties acting as attorneys or appointees in this case have been questioned by federal law enforcement agents regarding criminal allegations and these investigations are ongoing.
  7. Gerald Blechman, a psychologist and associate of the permanent guardian ad litem in this case, Michael Bender, has resigned on the advice of counsel due to his role in ongoing federal criminal investigations.
  8. This is just one of countless ways in which these conflicts of interest corrupt my access to justice.
  9. In addition to the criminal lawsuits, these parties are also named as witnesses and defendants in multiple federal civil lawsuits in which I am plaintiff.
  10. It is impossible to separate official acts from personally motivated acts under this circumstance, which is why rules regarding conflict of interest are so strict and most attorneys and judges follow these rules as a matter of course.
  11. As a federal witness I am entitled to protections under federal law which this court must also afford me. Namely 18 U.S. Code § 1512 prevents the Tampering with a witness, victim, or an informant and imposes criminal penalties on anyone who:

*“knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—*

*(1)influence, delay, or prevent the testimony of any person in an official proceeding;*

*(2)cause or induce any person to—*

*(A)withhold testimony, or withhold a record, document, or other object, from an official proceeding;*

*(B)alter, destroy, mutilate, or conceal an object with intent to impair the object’s integrity or availability for use in an official proceeding;*

*(C)evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding;*

*or*

*(D)be absent from an official proceeding to which such person has been summoned by legal process;”*

12. Under this rule, “an official proceeding need not be pending or about to be instituted at the time of the offense”.
13. Plaintiff’s counsel has orally and in written pleadings filed at the time of or around the time of this pleading referred to my role as a federal witness as a specific basis for financial penalties. However, even where explicit reference has not been made, it is impossible to determine if any emotional punishment ordered by this court, such as forced separation from my children, or financial punishment in the form of fees and sanctions are legitimate or acts in furtherance of witness intimidation and interference and obstruction of justice.
14. Given that the pleading is, on the face of it, legally baseless and not supported by facts or evidence, it would be impossible to consider actions based on this pleading as anything other than an act in furtherance of obstruction of justice, and intimidation of and retaliation toward a federal witness.

Wherefore, I pray that this court

- A. Dismiss this pleading and action entirely.
- B. Order Michael Bender, Kaye Mason, Steven Klein and Christopher Wehrman to withdraw from this case effective immediately due to their conflict of interest.

- C. That Judge Robert Johnson recuse himself from this case and transfer this case out of Cook County due to his conflict of interest for both Judge Johnson and Judge Dickler.
- D. Any relief that this court deems fit.

Respectfully Submitted by,

A handwritten signature in cursive script that reads "Megan Mason".

Megan Mason  
Respondent Pro Se

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  )  
MEGAN MATT,                                )  
              n/k/a MEGAN MASON,        )  
  )  
                      *Respondent.*                )

Case No. 2016 D 009534

**CERTIFICATE OF SERVICE**

I, Megan Mason, submit that I provided a copy of: Motion to Dismiss Plaintiff's Motion to Modify  
by: email Allocation of Parental Responsibilities  
on: July 18, 2022

Christopher Wehrman Katz, Goldstein & Warren 2345 Waukegan Rd Suite 150 Bannockburn, IL 60015 Tel: 8473179500 Fax: 8473170286 cwherman@kglaw.com	Steven Klein, Katz, Goldstein & Warren 2345 Waukegan Rd Suite 150 Bannockburn, IL 60015 Tel: 8473179500 Fax: 8473170286 sklein@kglaw.com	Michael Bender Caesar Bender LLP 150 N. Michigan Ave., #2130 Chicago, IL 60601 3122361500 mbender@caesarbenderlaw.com
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Megan Mason  
Acting Pro Se



A handwritten signature in cursive script that reads 'Megan Mason'.

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Megan Mason, Respondent

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