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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 PETER MATT’S RULE 137 PETITION FOR  
SANCTIONS**

I, Megan Mason, defendant pro se, move that this court dismiss petitioner’s Rule 137 Petition for Sanctions.

1. On April 28, 2022, Petitioner filed a Rule 137 Petition for Sanctions (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 Rule 137 Petition for Sanctions should be dismissed because it is substantially insufficient under the law in the following ways:
  - a. All my filings to date and court actions take to date have been honestly and sincerely conducted in the furtherance of legal actions necessary for myself and my minor children. I am pro se and though there is case law to support the imposition of sanctions on pro se litigants, a court must be particularly cautious in

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the imposition of sanctions on individuals who are not trained in the law but forced to litigate to protect themselves and their children.

- b. Plaintiff's claims are not supported by evidence. Although petitioner refers to filings and written testimony that I agree I have submitted, he presents no evidence that any action is spurious or statement I have made is false, or rather that I made a statement that I knew to be false.
  - c. It is impossible to debate the veracity of a statement or the legitimacy of an action unless there is a specific claim that may be considered through trial of fact. It is not enough to say, "Petitioner says my hair is orange" to accuse petitioner of an abusive of court time. One must also assert that, "Petitioner says my hair is orange. My hair is not orange. It wastes this court to call my hair orange because..".
  - d. Plaintiff's claims are not based in facts nor does plaintiff refer to facts in the pleading.
  - e. 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'spetitioner's Rule 137 Petition for Sanctions 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. 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.
9. 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.

10. 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;”*

11. Under this rule, “an official proceeding need not be pending or about to be instituted at the time of the offense”.

12. 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.

13. 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.

Resepctfully submitted by,

Megan Mason

Respondent Pro Se

Exhibit B

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

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

Affidavit in support of Megan Mason’s response to pending pleadings by petitioner Peter Matt as of July 18, 2022

I, Megan Mason, formerly known as Megan Matt, submit this affidavit in support my motions to dismiss the omnibus action to impose fines and revoke my parental rights as presented in multiple pleadings filed by petitioner’s counsel and currently set for hearing. I further submit this affidavit in support of my request that the court immediately cease all proceedings in this case until such time as they can be transferred to a neutral venue, heard by a neutral judge and be prosecuted by attorneys with no personal conflict of interest that might impact legitimate court proceedings.

The primary basis to immediately dismiss pending proceedings and to cease court action until such time as I may receive a fair hearing in a neutral court is that I am a federal witness and whistleblower related to multiple criminal acts currently under federal investigation. I know the following parties to be either witnesses or defendants in these ongoing investigations:

- Judge Robert Johnson, currently acting as presiding judge in my divorce case/
- Kaye Mason, Judge Johnson’s clerk;
- Judge Grace Dickler, currently head of teh Domestic Relations Division of The Circuit Court of Cook County Illinois;
- Michael Bender, The permanently appointed Guardian Ad Litem for my minor children;
- Christopher Wehrman, opposing counsel;
- Steven Klein, opposing counsel;
- Gerald Blechman, former custody evaluator;
- John Palen, former parenting coordinator

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Exhibit B Continued

Between October, 2021 and the present I have on multiple occasions provided statements to federal investigators as to the alleged crimes involving the above named parties and I sincerely understand these investigations to be active and ongoing.

I have received and am in possession of written correspondence from federal investigators related to ongoing investigations and I have witnessed and am in possession of copies of correspondence from federal investigators to other parties.

To state the obvious, I do not get to choose whether or not to be involved in litigation with petitioner, but all parties other than petitioner and myself are acting in roles that are presumed to be neutral and able to be performed by any other Illinois judge, attorney, or court appointee, respectively. There can be no official or legitimate basis to refuse to transfer and remove parties in this case where there is an obvious conflict of interest. Conversely, their continued and inexplicable engagement in litigation with a federal witness who has testified, is testifying and will testify in matters in which they are also witness or defendant, renders all actions illegitimate until this underlying conflict is remedied.

I submit this affidavit truthfully, under penalty of perjury, and attest that the statements made herein are true to the best of my knowledge

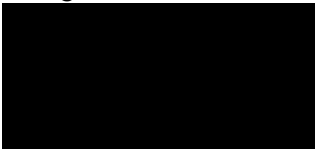
Respectfully Submitted,



Megan Mason

Petitioner

Megan Mason



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