

FILED
12/21/2022 10:54 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 01
20763988

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

IN RE: THE MARRIAGE OF)
PETER MATT,)
Petitioner,)
) Case No. 2016 D 9534
and)
)
MEGAN MATT,)
Respondent.)

AFFIDAVIT OF PETER MATT
IN SUPPORT OF EMERGENCY PETITION FOR ORDER OF PROTECTION

I, PETER MATT, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, do hereby certify that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief and as to such matters I certify that I verily believe the same to be true, and if called upon to testify in this cause, would do so as follows:

1. MEGAN MATT has engaged in a history of physical, emotional, and mental abuse, that are well known to this Court.
2. Due to MEGAN MATT's behavior, this Court has appointed a Parenting Coordinator, two Section 604.10(b) Evaluators (See **Exhibit A, Court Order of 5/25/21 and Exhibit B, Court Order of 9/26/22**), and Rule 215 Examiner (See **Exhibit C, Court Order of 11/7/22**), found MEGAN MATT to have seriously endangered the children thereby temporarily suspending her parenting time subject to supervised parenting time (See **Exhibit D, Court Order of 9/13/22**), and ordered her not to contact either of the children (See **Exhibit E, Court Order of 10/7/22**), MEGAN MATT has continued to violate this Court's orders and contact, communicate with, stalk, follow, and interact with the children.

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3. Notwithstanding this Court's October 7, 2022 Order that specifically orders MEGAN MATT not to have contact with the children by any means, MEGAN MATT has engaged in the following contact in violation of this Court's orders and harassed PETER MATT to participate in the violation of this Court's orders:
 - a. On September 30, 2022, MEGAN MATT asked to see the children behind PETER MATT's residence and then when to the school to see T [REDACTED]
 - b. On October 3, 2022 MEGAN MATT called PETER MATT five (5) times to talk to the children;
 - c. On October 4, 2022 MEGAN MATT purchased the children Apple Watch es to communicate with the children without a supervisor present;
 - d. On October 8, 2022, MEGAN MATT sent two postcards (one for each child) to the children);
 - e. On October 10, 2022 MEGAN MATT contacted PETER MATT to schedule a visit in violation of the October 7, 2022 Court Order;
 - f. On October 21, 2022 MEGAN MATT contacted PETER MATT and attempted to schedule another visit in violation of this Court's order;
 - g. On October 21, 2022, MEGAN MATT sent a text message to T [REDACTED]
 - h. On October 22, 2022, MEGAN MATT appeared at PETER MATT's residence to see the children;
 - i. On October 22, 2022, MEGAN MATT appeared at T [REDACTED] soccer game;
 - j. During the week of October 31, 2022, MEGAN MATT appeared the children's school bus stop multiple times.
 - k. During the week of November 7, 2022, MEGAN MATT appeared the children's school bus stop multiple times;

- l. During the week of November 14, 2022, MEGAN MATT appeared at the bus stop two times. During one of her violations of this Court's order by appearing at the bus stop, MEGAN MATT told Angus that he should enjoy his time PETER MATT while it lasts.
- m. On November 24, 2022, MEGAN MATT appeared at PETER MATT's residence and knocked on the door, and upon Angus opening the door, spoke to A [REDACTED] and gave him a card;
- n. On November 29, 2022, MEGAN MATT sent PETER MATT a message telling him to "stop committing more felonies" (**See Exhibit F, correspondence from Megan Matt to Peter Matt**);
- o. On December 14, 2022, MEGAN MATT appeared at the children's bus stop. She announced to all present that PETER MATT should obtain a criminal attorney; she told A [REDACTED] that he would come home soon because Judge Johnson was fired, and told PETER MATT and the children that they could not travel to Germany;
- p. On December 14, 2022, MEGAN MATT sent a text message to T [REDACTED], in violation of this Court's no contact order, stating that "Something bad happened today[]" and "You probably won't get to come home as soon as I thought." (**See Exhibit G, text message from Megan Matt to T [REDACTED]**) The text message occurred at 9:02 p.m., which was approximately 4 hours after her emergency motion to substitute judge for case was denied by Judge Kelley.

4. I am fearful for my safety and the safety of the children given MEGAN MATT's history of threats and verbal abuse toward me, as well as the abuse towards A [REDACTED] and continued violations of this Court's orders.

FURTHER AFFIANT SAYETH NOT.



PETER MATT

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief and as to such matters I certify that I verily believe the same to be true.

DATED: 12/19/22



PETER MATT

Katz, Goldstein & Warren
Attorneys for PETER MATT
410 N. Michigan Ave., Ste. 400
Chicago, Illinois 60611
Telephone: (847) 317-9500
cwehrman@kgwlaw.com
Atty No.: 35921
Service accepted at: pleadings@kgwlaw.com

FILED DATE: 12/21/2022 10:54 AM 2016D009534

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

IN RE: THE MARRIAGE OF)
PETER MATT,)
Petitioner,)
)
and)
)
MEGAN MATT,)
Respondent.)

Case No. 2016 D 9534

ENTERED
Judge Robert Johnson-2156
MAY 25 2021
IRIS Y. MARTINEZ
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

ORDER

This cause coming before the Court for a continued case status hearing and report of the GAL report and agreement on use of 604.10(b) evaluator, status on Peter Matt's Motion to Quash Subpoena to Swanson, Martin & Bell, and status of responses on Megan Matt's i) Motion to Modify Custody; ii) Petition for Rule to Show Cause as the childcare and safety; iii) Petition for Rule to Show Cause as to harassment iv) Petition for Rule to Show cause as to use of residence, both parties appearing remotely, Peter Matt appearing with counsel, and the Guardian Ad Litem appearing, and the Court hearing argument and further being advised,

IT IS HEREBY ORDERED:

1. Dr. Gerald Blechman (1751 South Naperville Road, Suite 206, Wheaton, IL 60189, 630/664-0525) is appointed as a 604.10(b) evaluator. The parties shall contact Dr. Blechman within seven (7) days to retain him for same. The parties shall each pay 50% of Dr. Blechman's retainer as required by Dr. Blechman.
2. Peter Matt has leave to file his motion for 508(b) fees. Megan Matt has until June 21, 2021 to file a response.
3. The parties' parenting scheduled is modified to reflect the current schedule used by the parties as follows:
 - i. Parenting time shall rotate with PETER MATT having parenting time the first week on Wednesdays beginning at 1:00 pm until Saturdays at 3:00 p.m. MEGAN MATT shall pick up the children from PETER MATT's residence on Saturday at 3pm. The following week, PETER MATT shall have parenting time from Wednesdays at 1:00 p.m. until Sundays at 10:00 a.m. with PETER MATT dropping the children off at MEGAN MATT's residence at 10:00 am on Sundays.
 - ii. MEGAN MATT shall have the remaining parenting time not herein identified.
4. Except for the change in parenting time identified above, the Allocation Judgment remains in full force and effect.

4234D
4606
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tabbies
EXHIBIT
"A"

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5. This matter is set for status on the GAL's investigation and status of 604.10(b) evaluation on July 13, 2021 at 10:00 a.m.

Counsel for Petitioner: cwehrman@smbtrials.com
Counsel for Respondent: megan42@gmail.com
GAL: mbender@caesarbenderlaw.com

ENTERED:



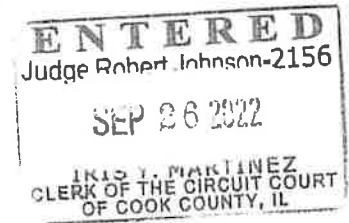
JUDGE

#29558
Christopher D. Wehrman (cwehrman@smbtrials.com)
Swanson, Martin & Bell, LLP
330 N. Wabash #3300
Chicago, IL 60611
312/321-9100

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

IN RE: THE MARRIAGE OF)
PETER MATT,)
Petitioner,)
)
and)
)
MEGAN MATT,)
Respondent.)

Case No. 2016 D 9534



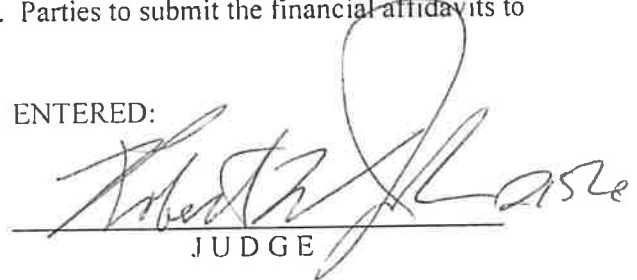
ORDER

This cause coming before the Court for hearing on the GAL's Motion to Substitute 604.10(b), both parties appearing remotely, Peter Matt appearing with counsel, and the Guardian Ad Litem being advised of the continued dates, and the Court being advised,

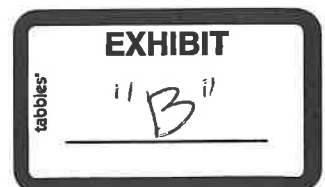
IT IS ORDERED:

1. The GAL's Motion to Substitute 604.10(b) is GRANTED. Dr. David Finn is appointed as the new Section 604.10(b) evaluator pursuant to separate order.
2. Both parties shall prepare updated financial affidavits and exchange same by October 6, 2022, along with the necessary back-up information including 2020 and 2021 tax returns, last 5 paystubs, and last 3 months of bank statements and credit card statements.
3. All other pending motions are entered and continued.
4. This matter is set for status on completion and exchange of financial affidavits and financial documents (and possible ruling on allocation of Section 604.10(b) fees) on October 14, 2022 at 9:30 a.m. via Zoom. Parties to submit the financial affidavits to the Court by October 12, 2022.

ENTERED:


JUDGE

#35921
Christopher D. Wehrman (cwehrman@kgwlaw.com)
Katz, Goldstein & Warren
410 N. Michigan Ave., Ste. 400
Chicago, IL 60611
847/317-9500



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Peter Matt

v.

Megan Matt

ENTERED
Judge Robert Johnson-2156
NOV 07 2022
IRIS Y. MARTINEZ
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

No. 2016 D 9534

Cal. 23

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ORDER

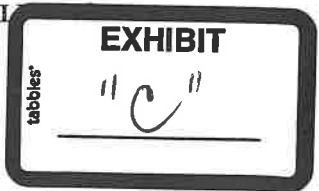
This matter coming to be heard for a hearing on Peter Matt's Motion for Rule 215 Examination filed on 6/28/22, Megan Matt filing her response on 7/18/22 and submitting an affidavit regarding the instant court appearance on 11/4/22 and all parties appearing in person, Peter Matt with counsel, and the GAL appearing, and Megan Matt making argument and examining witnesses but refusing to take the stand when called as a witness by Peter Matt, and the Court hearing testimony, receiving exhibits, and being fully advised,

IT IS HEREBY ORDERED:

① Peter Matt's Motion for a Rule 215 Examination is granted for the reasons stated on the record, including but not limited to the Court's finding of serious endangerment, ~~abuse~~, threats, irrational behavior, increase in insults, and observations of steady decline in mental health. The appointment is made pursuant to Rule 215(a)

Attorney No.: _____
Name: _____
Atty. for: _____
Address: _____
City/State/Zip: _____
Telephone: _____

ENTERED:
Dated: _____
Judge _____ Judge's No. _____



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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Peter Matt

v.

Megan Matt

No.

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ORDER

- ② Based on the profession and income of ~~the~~ Mrs Matt, the Court finds she is able to pay for the costs of the examination, and shall be solely responsible for same.
- ③ This matter is set for status on the recommendation of the guardian ad litem as to an appropriate Rule 215 examiner and the Court's final appointment of same, on ~~October~~ November 29, 2022 at 9:15 a.m. via Zoom.
- ④ All other orders remain in full force and effect.

Attorney No.: 35921
 Name: C. Wehrman/Katz Goldstein Guberman
 Atty. for: Petitioner
 Address: 410 N. Michigan Ave # 400
 City/State/Zip: Chicago IL 60611
 Telephone: 847/317-9500

ENTERED:

Dated:

Judge Judge's No.

FILED DATE: 12/21/2022 10:54 AM 2016D009534

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Peter Matt

v.

Megan Matt

ENTERED
Judge Robert Johnson-2156
SEP 13 2012 No.
IRIS Y. MARTINEZ
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

2016 D 9534

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4244 P 4317
7551P
76207

TEMPORARY ORDER

This matter coming before the Court for continued hearing on Peter Matt's Motion for Modification of Parenting Time and Allocation of Parental Responsibilities, the parties being in Court in person, Peter Matt with counsel, and the GAL being present, both parties completing their cases in chief, and the Court being advised,

IT IS HEREBY ORDERED:

- ① Megan Matt's motion to dismiss the Motion to Modify is Denied.
- ② Peter Matt's Motion to Modify Parenting Time and Allocation of Parental Responsibilities is granted on a ~~separate~~ temporary basis and until the conclusion of a Section 604.10(b) report, subject to the following:

Attorney No.: _____
 Name: _____
 Atty. for: _____
 Address: _____
 City/State/Zip: _____
 Telephone: _____

ENTERED: _____
 Dated: _____
 Judge _____ Judge's No. _____



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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Peter Matt

v.

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ORDER

- ③ The GAL Petition For Rule to Show Cause is stayed subject to the bankruptcy filing.
- ④ All other pending motions contained within the July 19, 2022 order are entered and continued unless otherwise indicated herein.
- ⑤ The GAL's motion for substitution of 604.10(b) Evaluator is set for hearing via Zoom on September 26, 2022 at 9:00 a.m.

Attorney No.: 35921
 Name: C. Wehrman / Katz Goldstein & Warren
 Atty. for: Peter Matt
 Address: 410 N. Michigan Ave. Ste 400
 City/State/Zip: Chicago IL 60611
 Telephone: 312-317-9500

ENTERED:

Dated: _____

Judge

Judge's No.

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Peter Matt

v.

Megan Matt

No. 2016 D 9534

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ORDER

- a) Megan Matt's parenting time is restricted based upon the Court's finding under serious endangerment.
- b) Megan Matt's parenting time shall be supervised by a supervisor agreed to by the parties or recommended by the GAL. Any costs of supervision shall be paid by Megan Matt.
- c) Megan Matt's parenting time schedule shall remain the same so long as a supervisor is present. The supervisor's availability to supervise shall be tendered to the GAL and parties at least seven (7) days in advance.
- d) Peter Matt has temporary allocation of all parental responsibilities.

Attorney No.: _____
 Name: _____
 Atty. for: _____
 Address: _____
 City/State/Zip: _____
 Telephone: _____

ENTERED:

Dated: _____

_____ 2156

Judge

Judge's No.

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

IN RE: THE MARRIAGE OF)
PETER MATT,)
Petitioner,)
and)
MEGAN MATT,)
Respondent.)

Case No. 2016 D 9534

ENTERED
Judge Robert Johnson-2156
OCT 07 2022
IRIS Y. MARTINEZ
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

ORDER

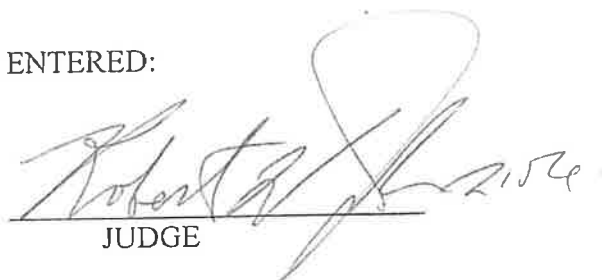
This cause coming before the Court for Megan Matt's presentment of her Section 2-1401 Petition to Vacate the August 25, 2020 Finding of Contempt and Order and Motion to Terminate Guardian Ad Litem Appointment, Peter Matt appearing through counsel and the GAL appearing, but Megan Matt failing to appear, and the Court being advised,

IT IS ORDERED:

1. Megan Matt's Section 2-1401 Petition to Vacate the August 25, 2020 Finding of Contempt and Order and Motion to Terminate Guardian Ad Litem appointment are stricken.
2. On the Court's motion, based on the communications, threats, and misbehavior of Megan Matt, a Rule 215 examination is hereby ordered by separate order.
3. Megan Matt's parenting time and contact by any means with the children is stayed pending further court order after the Rule 215 examination is completed based on her communications, threats, and misbehavior which poses a serious endangerment to the minor children.
4. The October 14, 2022 court date is stricken.
5. This matter is set for status on the Court's Rule 215 examination on November 15, 2022 at 9:30 a.m via Zoom. All other pending motions are entered and continued to said date.

#35921
Christopher D. Wehrman
Katz, Goldstein & Warren
410 N. Michigan Ave., Ste. 400
Chicago, IL 60611
847/317-9500
Attorneys for Peter Matt
pleadings@kgwlaw.com
Respondent: megan42@gmail.com
GAL: mbender@caesarbenderlaw.com

ENTERED:


JUDGE



Subject: [REDACTED] is Working for The FBI You should
too

• **MM Megan Mason** 11/29/2022 9:42 AM

Peter, I was serious about what I said in court. [REDACTED] has turned federal witness for the FBI. He was implicated in your money laundering and tax evasion. I also believe [REDACTED] is probably working for the FBI, you'll notice she has federal district court experience. You are very low level here. They are using you to get to judges. They want Johnson. I don't give a fuck about Johnson though I think Bender should be punished severely. Everything Wherman files is to make the case for the feds for HIS deal, including using a fake address. You need your own deal, Peter. I want this to stop. You probably don't have a chance of keeping your green card but you might be able to avoid prison if you cooperate. Do it now. There is no immunity with Wehrman because you've conspired in crimes that are ongoing. Stop committing more felonies. You are under constant surveillance. This will not work. The reason they are trying to get me incarcerated and to inflict financial pain is to add on witness retaliation. This has nothing to do with your financial crimes. Hire a federal criminal defense attorney. Fire [REDACTED]. Let the kids come home before they get sent to foster care because of the cluster fuck you guys are creating. Stop this, Peter. You aren't avoiding anything, you're adding on crimes. Have a real federal criminal defense attorney look at what [REDACTED] filed, tell him that I gave the feds everything, EVERYTHING, back in 2021. He'll tell you I'm right. Megan

• Peter Matt viewed this subject. 11/29/2022 9:52 AM

• **MM Megan Mason** 11/29/2022 12:50 PM

BTW [REDACTED] has been really eager to share everything "crazy" that I've written, right? Especially outlandish allegations of federal investigations, right? He didn't share you the facebook message I sent his wife or the email I sent him where I said, "I know you're a fucking FBI informant", did he? Have your criminal defense attorney ask him why.

• Peter Matt viewed this subject. 11/29/2022 1:07 PM





Mum



9:02 PM, 14. Dez.

██████ sweetie. I'll never lie to you. Something bad happened today. You probably won't get to come home as soon as I thought. This is really unfair and I'm so sad, but please don't give up. You know the truth. Trust yourself and trust that you will come home. Christmas will be here when you come home. Please believe that I'm always here for you, always working to bring you home.

I know this will be over soon but you have to believe in the truth and in yourself in the meantime. Every day I'm praying for you. I'm so disappointed to wait to have you home but you belong here. You will come home. I love you so much.



Text kopieren



Senden



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