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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

**MEGAN MASON’S SECTION 2-1401 PETITION FOR RELIEF FROM JUDGMENT IN
AUGUST 21, 2020 RULING OF CONTEMPT OF COURT**

I, Megan Mason, respondent pro se in this matter, petition the court to vacate the August 21, 2020 finding of contempt of court against Megan Mason pursuant to Illinois 735 ILCS 5/2-1401, hereafter referred to as “Section 2-1401”. I ask that the court vacate the August 21, 2020 order finding me in contempt of court. As is detailed in this petition, supporting affidavit and supporting exhibits, this ruling was made as a result of fraud. These multiple acts of fraud, which relate to ongoing criminal acts in furtherance of the fraud, denied me the opportunity to present my meritorious defense against this action. This fraud has irrevocably tainted not just this order at hand but must necessarily render all actions in case 2016 D 9534 by trial judge Robert Johnson void as hopelessly corrupted by fraud. In support of this petition I state as follows:

A. This Court has jurisdiction to rule on this matter pursuant to Section 2-1401

1. According to Section 2-1401 parties may petition for relief from final orders and judgments after 30 days have passed since entry of judgment. The ruling was made in this court on

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August 21, 2020 and according to Section 2-1401 this court is the appropriate venue. This petition is supported by affidavit and by exhibits showing as to matters not of record. This petition has been served upon parties according to Illinois Supreme Court Rule 106, which requires parties to follow the same rules as those prescribed in Rule 105.

2. As supported by affidavit and exhibits filed, I have been the victim of ongoing fraud by multiple parties in this case, most notably by my former counsel of record Bradley Trowbridge, which precedes the March 8, 2020 filing of a Petition for Rule to Show Cause by petitioner Peter Matt, which led to the August 21, 2020 final judgment of Contempt of Court against me entered in this court. The grounds for relief were fraudulently concealed.
3. Since at least March 8, 2020, Bradley Trowbridge participated in a fraud against me, specifically identity theft and wire fraud in violation of Federal Rules 18 U.S. Code § 1343 and 18 U.S. Code § 1028A, while purporting to be my attorney, as documented on a prima facie basis in the supporting exhibits. Since at least July 21, 2020 Robert Johnson, personally, has committed direct acts of fraud against me, specifically identity theft and wire fraud in violation of Federal Rules 18 U.S. Code § 1343 and 18 U.S. Code § 1028A, while acting under color of law in the role of trial judge, as is documented on a prima facie basis in the supporting exhibits and in the official court record.
4. In 1962 the Illinois Supreme Court defined duress as “a condition where one is induced by a wrongful act or threat of another to make a contract under circumstances which deprive [the individual] of the exercise of free will.” Kaplan v. Kaplan, 25 Ill. 2d 181, 185, 182 N.E.2d 706, 708 (1962).

5. Since at least March 8, 2020, when Bradley Trowbridge committed the first known act of fraud directly documented in this petition, every action I undertook in this court under the belief that Bradley Trowbridge was my legal advocate must be considered as having been made under duress. Since it's impossible for me to know when, if ever, Mr. Trowbridge was acting as my legal advocate and not engaged personally in crime against me, it must be assumed that every action I made in this case while Bradley Trowbridge was my attorney of record was made under duress.

6. In the same way, as a trial judge with authority over every single aspect of this case and the specific state authority to deny me of liberty and to impose severe punishment on me, including incarceration, Robert Johnson clearly demonstrated that he used his position to place me under duress when he committed crimes against me under color of state law. Specifically, I was clearly under duress subsequent to the wire fraud and identity theft Robert Johnson committed against me on July 21, 2020. Therefore every action I made subsequent to the July 21, 2020 criminal act must be considered as having been made under duress. Since it's impossible for me to know when, if ever, Robert Johnson was acting exclusively as a trial judge assigned to this case and not engaged personally in crime, it must be assumed that every action I made in this case while Robert Johnson was assigned as trial judge was made under duress.

7. Typically Section 2-1401 petitions must be made within two years of the entry of judgment, but this action is exempt from the two year limitation. According Section 2-1401(C), "*Time during which the person seeking relief is under legal disability or duress or the ground for relief is fraudulently concealed shall be excluded in computing the period of 2 years.*" The grounds for relief were fraudulently concealed to me and it was only due to my own research

in June, 2021 that I started to understand some of the fraud committed against me. I am still learning what other fraud has transpired and the fraud is ongoing.

8. As of this writing, ongoing acts in furtherance of the crime described and documented herein continue, therefore the tolling period for Section 2-1401 has not commenced. As of this writing, Robert Johnson continues to act as trial judge, continues to engage in acts in furtherance of his fraud, and it is also for this reason that the tolling period has not commenced.

B. There exists a meritorious defense against the August 21, 2020 order

9. There were no facts or exhibits presented to the court in support of the August 21, 2020 ruling of Contempt of Court. (Affidavit or “Exhibit A”; Exhibit B)
10. In order to meet the standard of proof for a ruling of contempt of court, the complaining party must present a preponderance of evidence to the court in support of the allegation. There was no evidence presented to the court in support of this petition. Therefore I had a meritorious defense against the allegation, which was that the opposing party had not made a specific allegation of contempt of court supported by facts or evidence and on the face of it the action ought to have been dismissed. Effective counsel would have swiftly moved to dismiss the action and a neutral judge would have swiftly granted the dismissal as required by Illinois law.

Fraud 1, The Trowbridge Fraud in Hiding Contempt Allegation and Hearings

11. Bradley Trowbridge engaged in multiple acts to orchestrate a false ruling of contempt of court against me, thereby preventing me from presenting a meritorious defense against the claim because I believed Mr. Trowbridge was my advocate, not my adversary. However his

actions also led to me failing to respond to the allegation for four months and failing to appear at court dates. Even if this claim had been brought before a neutral court, which seems implausible given the totality of facts presented here, it is almost certain that even a neutral judge might regard a litigant who does not reply to a contempt allegation and does not appear as ordered in court as more likely to have committed violations of court orders.

12. Between at least March 8, 2020 and July 20, 2020, Brad Trowbridge has participated in a fraud intended to orchestrate a default finding of contempt of court by hiding the allegation and related court dates from me. When that deception failed, Brad Trowbridge acted to prevent me from defending myself against the allegation of contempt of court by purporting to act as my attorney, thereby depriving me of access to effective counsel, while failing to offer a defense. He further denied me the opportunity to move to reconsider this ruling or appeal. As of this writing Brad Trowbridge persists in ongoing acts of fraud to hide his and others' ongoing criminal activities. He committed at least eight acts of fraud, either by willfully not disclosing notices from the court or opposing counsel served on him on my behalf or by directly lying to me as to distract me from discovery of the contempt allegation.

A. On March 10, 2020, Peter Matt's attorney, Christopher Wehrman, filed a Petition for Rule to Show Cause in the court, alleging contempt of court. In the proof of service attached to the PRTSC, also filed in the court on March 10, 2020, Mr. Wehrman attested under penalty of perjury that he served a Petition for Rule to Show Cause upon me by means of email to my then attorney of record Bradley Trowbridge on March 8, 2020. Bradley Trowbridge did not inform me that I had been served and that I had been alleged of committing contempt of court.

- B. Bradley Trowbridge received electronic notice from the court on March 10, 2020 that a court date was scheduled in this matter on March 20, 2020. Bradley Trowbridge did not inform me that there was a pending court date.
- C. This court date was postponed and Mr. Trowbridge received electronic notice from the court on March 20, 2020 that the court date was continued until April 21, 2020. Bradley Trowbridge did not inform me of the continuance, and had still not informed me of the PRTSC or other court dates.
- D. On March 10, 2020, Bradley Trowbridge billed me .10 hours for a line item reading “Review Petition for Rule to Show Cause”. However, I did not become aware of this line item until I reviewed my emails over a year later, after other fraud was discovered.
(EXHIBIT C)
- E. On April 6, 2020 the court date was continued to May 18, 2020. On April 20, 2020, Bradley Trowbridge received electronic notice in the form of email that the hearing in this case had been continued. He still did not inform me of the PRTSC or the original or continued court dates.
- F. On April 15, 2020, I wrote to Brad Trowbridge:
“I hope you're well and your clients are not suffering too badly from the quarantine. I'm personally quite pleased that no motions are being filed right now, a nice break =).”
(EXHIBIT D).
- G. On April 15, 2020 Bradley Trowbridge responded to this email. At this point he had received the duly filed PRTSC on my behalf. He had received at least three emails regarding court dates scheduled in this matter and he had billed me for reading the PRTSC. Nevertheless, he did not disclose the PRTSC and persisted in the fraud, writing,

“Yes, unfortunately, it took a pandemic to stop Peter's legal abuse of you!” (EXHIBIT D).

- H. On May 27, 2020 the court date was continued to July 6, 2020. Bradley Trowbridge received electronic notice from the court by email on May 27, 2020. He still did not inform me of the PRTSC or the original or continued court dates.
- I. On July 6, 2020 a docket entry was made by Judge Robert Johnson at 9:00am: CASE SET ON PROGRESS CALL.
- J. On July 7, 2020 the Guardian Ad Litem Michael Bender billed me for a court appearance. (EXHIBIT E)
- K. On July 12, 2020, I learned about the court appearance after reading Michael Bender's invoice. On this same date I wrote to Bradley Trowbridge, *“Zoom court? What?”*. (EXHIBIT E)
- L. On July 13, 2020, Bradley Trowbridge wrote to me:
“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)
- M. On July 13, 2020, Bradley Trowbridge did not inform me of the PRTSC or the original or continued court dates.
- N. On July 20, 2020 there was a status hearing. I did not know then that it was a status hearing on a PRTSC because I did not know about the PRTSC. I thought it was a hearing for Michael Bender, who had been appointed as Guardian Ad Litem (GAL), to step down because Bradley Trowbridge had told me he was intending to do this before the onset of Covid. From the time I retained him, Bradley Trowbridge had advised me that it would be better for me not to go to most court appearances. He explained that this was so that he

could argue my position and I could remain more likable and feminine to the judge. So I did not attend the court hearing on July 20, 2020, on the advice of Bradley Trowbridge.

- O. On July 20, 2020 I wrote to Bradley Trowbridge about the court appearance: *“Did Michael make a motion to be removed? Anything filed against me?”* (EXHIBIT F)
- P. On July 20, 2020 Bradley Trowbridge finally admitted that a petition was filed accusing me of being in contempt of court. He removed the proof of service showing that Christopher Wehrman served him with this petition on March 8, 2020. He implied that the petition had somehow been missed because of physical court closures, writing:

“Peter filed this and it was supposed to be up in April when courts were closed. We were given time today to respond to it so I need input from you about how to respond.” (EXHIBIT G)

- Q. No exhibits were presented to me by Bradley Trowbridge in support of the petition and the petition named no action that constitutes contempt of court. I wrote, “I don’t see any evidence. I don’t understand what he wants”. (EXHIBIT B)
- R. Although Bradley Trowbridge had previously told me that the standard of contempt of court is relatively high, he never explained what I was accused of doing that was in contempt of a court order. The Petition contained generalizations about my character and temperament, according to Mr. Matt, but no facts or evidence. Mr. Trowbridge told me I had to write a detailed response to the PRTSC, which I now understand should have been dismissed on the face of it. So a response was filed that I drafted without the assistance of legal counsel. At trial Mr. Trowbridge said very little and offered no defense, no specific allegation of contempt having been made. I was truly shocked to have been found in contempt of court because I had not violated a court order and no evidence had been presented that I had committed contempt of court.

- S. On August 20, 2021, directly after the zoom hearing in which I was rapidly and inexplicably held in contempt of court, I immediately called Bradley Trowbridge. On the phone call Mr. Trowbridge seemingly agreed with my shock at the verdict. I asked him to appeal it. Mr. Trowbridge indicated the better method to reverse the order would be to file a motion to reconsider and told me he would do so. He did not tell me that a motion to reconsider or an appeal is subject to a thirty day timeline.
- T. Mr. Trowbridge withdrew from my case forty days after the entry of judgment finding me in contempt of court. He had not filed a motion to reconsider as promised.
- U. I have attempted by email and by letter to obtain the documents related to the service of The Petition for Rule to Show Cause on Mr. Trowbridge. As of this writing, he still refuses to send me the email with which he was first served the PRTSC. And although the Proof of Service is filed with the court, he still refuses to provide that to me.
- V. Having sworn under affidavit to have served Mr. Trowbridge with the PRTSC on March 8, 2020 on my behalf, I have repeatedly attempted to obtain a copy of the email from Mr. Wehrman to Mr. Trowbridge and a copy of the proof of service sent then. Mr. Wehrman has refused to provide them to me and chastised me for requesting them from his staff.
- W. The large number of fraudulent acts by Brad Trowbridge make it clear that his misconduct was not negligence. It was intentional, criminal fraud which prevented me from accessing justice and presenting a defense in this matter.

Fraud 2, The Robert Johnson Fraud in Entering a False Pro Se Appearance

- 13. During the period beginning March 8, 2020, when the action under review here commenced, and August 21, 2020, when he entered the order under review here, Robert Johnson actively

participated in at least one criminal act of fraud documented with this petition and appears to have conspired in Mr. Trowbridge's fraud.

- A. I do not know what private communications might have taken place between Bradley Trowbridge and parties involved in this case between March 8, 2020 and July 20, 2020, when he finally appeared at a status hearing on this matter. It is my understanding that Bradley Trowbridge was not present at a July 6, 2020 status call. According to a bill from Michael Bender there was a court hearing on July 7, 2020. According to the docket this hearing was on July 6, 2020. I do not know if or when a hearing took place.
- B. If there was in fact no hearing, Robert Johnson fraudulently entered a docket entry "CASE SET ON PROGRESS CALL" on July 6, 2020 and Michael Bender fraudulently billed me. If there was a hearing, neither I or anyone representing my beneficial interest was present. I have witnessed Judge Johnson many times in his courtroom, and when there is a status call and one party is not present, he invariably asks opposing counsel to contact that litigant's counsel or that pro se litigant. This is particularly true with Zoom meetings, which do not require waiting for counsel to travel if they are not in the court. I know of no effort by opposing counsel, Judge Johnson or any other party involved in these proceedings to contact me or Mr. Trowbridge about a "missed" court hearing. I know of no contact by any of these individuals to inquire why I had not responded to Mr. Matt's March 10, 2020 PRTSC. This makes it appear that these parties knew of and participated in Mr. Trowbridge's fraud.
- C. I had no contact with Robert Johnson or Kaye Mason, who is employed as his scheduler between March 8, 2020 and the August 20, 2020 hearing on Peter Matt's March 8, 2020 Petition for Rule to Show cause. I did not have any telephone or zoom interaction with

either individual during this period. I did not have any written correspondence with either individual or prepare, review or sign documents, for example a motion for leave to appear pro se, that was delivered to either individual during this time, apart from my response to the contempt allegation. (EXHIBIT A)

- D. On July 21, 2020 Mr. Johnson entered an order allowing a pro se appearance on my behalf. I incorporate by reference the docket entry on July 21, 2020, "FILE APPEARANCE OR JURY DEMAND, ANSWER OR PLEAD - ALLOWED -", entered by "Judge: Johnson, Robert W.", with participant, "MATT MEGAN".
- E. When Robert Johnson entered this pro se appearance he had not received written notice that I wished to appear pro se, he had not heard me state that I wished to appear pro se and he knew that I was unaware of the activity. When Robert Johnson entered this order, he knew that I believed Brad Trowbridge was my attorney. It was a fraud committed on me using the court's electronic filing system, Odyssey File and Serve, falsely indicating that I had at some time previously elected to advocate for myself. It appears that this fraudulent act was committed in order to attempt to backfill the case with false indications that I had ignored or fired counsel, just as Mr. Trowbridge's fraud seemed to focus on a false narrative that I had "ignored" four months of a contempt case being presented against me. In other words, it was an act in furtherance of the scheme to "fix" the contempt case.

Additional Crimes Committed Under Court Authority Render the August 21, 2020, and all other Rulings Since the Appearance of Robert Johnson as Trial Judge Void

14. Although Bradley Trowbridge withdrew in the fall of 2020, Robert Johnson has continued in committing personal, criminal acts of fraud under color of law against me while assigned as trial judge. These frauds are ongoing.
15. Robert Johnson has personally, under the color of state law, committed acts in conspiracy to commit money laundering and tax evasion. Christopher Wehrman, attorney for petitioner Peter Matt, has also conspired in these acts. As of this writing both parties persist in acts in furtherance of conspiracy to commit tax evasion and money laundering in violation of Federal Laws 18 U.S. Code § 1956 and 26 U.S. Code § 7201.
 - A. As it happens, though I am a lay person, I am employed as a licensed financial advisor at an investment bank and specifically trained in federal financial crimes. Two particular areas of training for my work are the prevention of money laundering and anti-bribery training. (EXHIBIT H, EXHIBIT I).
 - B. On November 24, 2020 I filed a motion for a hearing on allocation of fees and duly served it upon parties. I incorporate by reference “*Motion for Allocation of GAL Fees, Extraordinary Healthcare Costs, 604B Investigation Costs, and Attorney Fees for Megan Mason*”, docketed in this court at 12:00pm on November 24, 2020. In this motion I asked the court to consider Mr. Matt’s considerable concealed wealth in business and bank accounts in Europe and Asia which he does not disclose to The IRS, and his use of business funds to pay his personal expenses. I argued that Mr. Matt’s considerable hidden wealth as well as his tax evasion enable him to pay more fees than I can pay with income that is taxed and no wealth of my own. I specifically presented to the court bank statements and canceled checks signed by Peter Matt from a Wintrust Account he shares with his father, which his father uses to deposit funds from Mr. Matt’s hidden assets as a

way to layer these funds into the banking system by calling the illegal proceeds of tax evasion “gifts” or “loans”. In support of this motion, I presented the court with statements from approximately five bank accounts, canceled checks, financial statements and other evidence demonstrating the clear existence of these resources. In all, the motion disclosed approximately thirty aggravated financial felonies committed by Mr. Matt. The supporting exhibits filed were voluminous.

- C. On January 19, 2021 I filed in this court a document subpoena issued to Peter Matt’s attorney, Christopher Wehrman, requesting a record of payments received from Mr. Matt, including the source of payment. As a pro se litigant I, unlike attorneys, may not issue subpoenas on my own but must have them stamped by a clerk employee. So I filed this document subpoena with the clerk in order to have it duly stamped. It was then delivered to Mr. Wehrman.
- D. On February 11, 2021, Peter Matt, by counsel Christopher Wehrman, filed in this court a motion to quash my document subpoena for source of payments from Matt to Mr. Wehrman.
- E. On February 24, 2021 I filed in this court a response to Peter Matt’s motion to quash my document subpoena.
- F. On April 22, 2021 Mr. Matt, by counsel, and I appeared in court at a status hearing. I asked for hearing on the motion to quash the document subpoena and financial allocation motion. At that time Christopher Wehrman stated to Judge Johnson, “Your honor, Ms. Mason just wants to subpoena my payments to show I’m laundering money for my client”.

- G. On April 23, 2021 Robert Johnson entered an order continuing ruling on Peter Matt's motion to quash a duly filed subpoena for record of payments from Mr. Matt to Christopher Wehrman as well as the Allocation of Fees motion itself. Since that time he has refused to allow any hearing on this motion to quash the subpoena and has not enforced the subpoena.
- H. Robert Johnson likewise has refused hearing on the motion for allocation of fees, though he had originally ordered a hearing on allocation of GAL fees himself. Without legal basis these actions are clearly part of a pattern of Mr. Johnsons's conspiracy to commit money laundering and tax evasion by using his authority to stop public hearing of facts that disclose Mr. Matt's crimes, in violation of Federal Laws 18 U.S. Code § 1956 and 26 U.S. Code § 7201.
- I. As of this writing these criminal acts continue.
16. Robert Johnson has conspired in the solicitation of bribery by court appointee John Palen and persists in refusing to disclose the unsanctioned ex parte email communications in which this solicitation of a bribe was made.
- A. At the instruction of the now permanent GAL in this case, Michael Bender, Judge Johnson ordered a parenting coordinator named Dr. John Palen to be appointed on August 28, 2020. I was not consulted and this was approved by Bradley Trowbridge shortly before he withdrew.
- B. On December 5, 2020, Dr. Palen accidentally copied me on an email to Peter Matt's attorney, GAL Michael Bender and Judge Johnson, by means of his clerk Kaye Mason. The subject line of the email was, "IRMO Matt; 2016 D 9534; COURT ORDER". He wrote, "I want to be paid. It is as simple as that." (EXHIBIT J). At this time Dr. Palen had

a large, positive retainer balance and there were no fee actions being contemplated, much less pending. There has never been a controversy over fees brought to the court by means of motion regarding Dr. Palen's fees.

- C. Dr. Palen attempted to lie to me by saying, "Sorry- this was meant for another case. I had not noticed Ms. Mason on the list of recipients." (EXHIBIT K). It is not plausible that this was for another case, given that the subject line was my case number and married name and the thread happens to include opposing counsel, GAL and clerk/judge assigned to my case. Furthermore, it was Ms. *Megan* Mason, me, who was accidentally copied, whereas the intended recipient was Ms. *Kaye* Mason., which is to say Judge Johnson's clerk.
- D. Because Dr. Palen had no legitimate basis to request payment I feared and continue to fear it was a solicitation of a bribe. Even if not a solicitation of a bribe, it is an ex parte communication given the participation of the trial judge by means of his clerk. The Illinois Code of Judicial Conduct clearly prohibits ex parte communication, which is private communication between the court and one party in a legal action.
- E. I have asked Robert Johnson, Jonathan Palen, Christopher Wehrman, Kaye Mason and Michael Bender to disclose the remaining emails in the thread to me. It would seem that if there were exculpatory information that indicated an innocent basis for Dr. Palen's statement about getting paid, it would be in everyone's interest to share it with me. All parties refused.
- F. I have attempted to subpoena The Court, The Clerk, Kaye Mason, Michael Bender, John Palen and Christopher Wehrman for the emails. I have not been successful.

- G. On March 2, 2022 I appeared before Judge Johnson by court order. He said, “The reason I called you in here is because you subpoenaed my clerk”. I explained that I wanted copies of the emails in the thread, “IRMO Matt; 2016 D 9534; COURT ORDER” as is my right under Illinois rules barring ex parte communications and requiring that they be swiftly disclosed. I also argued that Kaye Mason does not own the emails on the server owned by the State of Illinois and that she has no right to refuse to tender them. Judge Johnson said in that case I should subpoena the Court. I explained that I had subpoenaed the Court by means of Attorney Briana Steger. Judge Johnson then said, “I looked at the emails. They are fine. You don’t need to see them.”
- H. Judge Johnson and Christopher Wehrman have also attempted to use their authority to manipulate me, as a lay person, by stating that the emails are not “ex parte” or that I do not know what “ex parte” means. This is but one of the countless examples of how I am acting under duress. Obviously, secret emails about my case between a judge’s clerk, two court appointees and opposing counsel are ex parte. Any person with a second grade education could understand that this email thread is “not fair”. And anyone with a law degree (or access to Google) could understand that this far surpasses what happened in *People v. Bradshaw*, 116 Ill. App. 3d 421, where one party saw another party’s mother hand a note to a bailiff, which was passed to the judge.
- I. All parties continue to refuse to tender to me the remaining emails in the thread with the subject line, “IRMO Matt; 2016 D 9534; COURT ORDER”. As of this writing I have received no explanation from Dr. Palen or any other participant in the ex parte thread as to why Dr. Palen was soliciting payment, when he had a positive retainer balance and had

brought no payment controversies to the court through formal means, such as a duly filed motion to order fees paid.

17. In the spring of 2021, Mr. Matt escalated his criminal activity to involve our minor children.

Not only has Robert Johnson in the role of trial judge failed to take actions to protect our children, but he has used the court authority to prevent me from protecting our children.

A. In early May, 2021, Peter Matt requested a meeting with me and the court ordered parenting coordinator Dr. John Palen. The reason for the meeting, as stated by Peter was, “To stop Megan from interfering with [his] business plan”.

B. During this meeting, via Zoom, Peter Matt, John Palen and I were in attendance. Peter described how he intended to make our son, A [REDACTED] CEO of his company. A [REDACTED] is fourteen years old and does not consistently count to ten. A [REDACTED] teachers do not anticipate that he will be fully independent as an adult and that he will likely receive permanent disability benefits. Mr. Matt explained that he wanted A [REDACTED] to be named CEO so that his business can get contracts for companies owned by disabled people. I said I was opposed to this plan for two reasons. First, I said this is fraud and I am opposed to my son being used to participate in a fraud scheme. Second, I argued, this might jeopardize A [REDACTED] disability benefits when he turns eighteen. Dr. John Palen, on behalf of the court and Judge Johnson, stated that he thought that sounds like a nice activity for A [REDACTED]. Dr. Palen specifically encouraged Mr. Matt to draft a business plan.

C. On May 11, 2021, Peter Matt wrote a follow up email to me , “*I also did a business plan, as suggested by John, for A [REDACTED] becoming the main shareholder of Goedecke so the company would get a Disability Supplier Diversity Certification.*” (EXHIBIT L). He continued, “*To address your specific concerns how it would impact A [REDACTED] entitlements, I*

should guarantee that you or A [REDACTED] would not have any financial disadvantages and most likely once A [REDACTED] would turn 18 and eligible for SSDI, we would reverse A [REDACTED] ownership and control." (EXHIBIT L).

- D. Mr. Matt attached the business plan which further detailed the fraud of A [REDACTED] stating, "A [REDACTED] salary, as well as any distributions should remain with Peter", and further stated that, "Once A [REDACTED] becomes eligible for SSDI and/or in case his ownership is no longer beneficial as been decided by Peter, his shares and title should fall back to Peter." (EXHIBIT M). In this way, Mr. Matt made it clear that he intended to commit a fraud that not only involves our minor, disabled child but, using court authority, intends to defraud that very child. In order to obtain status as a disabled owned company, with any of the certifying bodies, the CEO must be the highest paid executive and own the highest number of shares. So in order to perpetrate the fraud, Mr. Matt must claim to pay A [REDACTED] a salary and give him business ownership. But although it was his wish to defraud clients seeking to hire certified, disabled owned businesses, Mr. Matt did not wish to actually pay A [REDACTED]. So he included in his court ordered business plan his intent to steal A [REDACTED] salary and capital gains as well as to steal his ownership in the company.
- E. I have raised this issue to the court many times. Dr. Palen, GAL Michael Bender and Judge Robert Johnson have all failed to take any action to intervene.
- F. In fact, in the last four months, Judge Robert Johnson has removed all my parental rights and even issued an order of protection preventing me from any contact with my son. In this way I am barred by Robert Johnson from taking action to stop the criminal exploitation of my children or even from learning about crimes against them so that I may report them to law enforcement authorities.

18. Every act committed by Robert Johnson under color of state law subsequent to his first becoming aware that I was publicly disclosing his and other parties' criminal activity in this case, around November 30, 2020, has been increasingly focused on silencing me as a federal criminal witness and retaliating against me for my testimony. Increasingly he has dispensed with formalities such as hearings to which I or anyone representing my interest are in attendance. He has long dispensed with any requirement that opposing counsel present evidence or facts in support of Peter Matt's claims, but he has increasingly considered facts that are quite literally my documented federal testimony about his and his co conspirators' crimes. For this reason, I incorporate by reference every judicial act by Robert Johnson documented with The Clerk of The Circuit Court of Cook County between November 30, 2020 and now. Every act was and is in furtherance of his criminal violation of Federal Laws 18 U.S. Code § 1513, Retaliating against a witness, victim, or an informant, and 18 U.S. Code § 1512, Tampering with a witness, victim, or an informant. Where any of Robert Johnson's judicial acts between November 30, 2021 and now appear to be official judicial activity, this is purely coincidental to the core goal of Robert Johnson to attempt to use state authority to hide his personal crimes and protect his employment, namely by intimidating, silencing and discrediting me as a witness against him.

C. I have exercised due diligence in presenting this defense

19. The core basis for this petition: fraud and duress by both opposing counsel and trial judge committed during the proceeding that led to the August 21, 2020 contempt ruling, all but negate the requirement that I demonstrate due diligence in presenting my defense. I am a lay person. It is enough that I retained an attorney who is licensed by The Illinois Bar and

signed a retainer agreement that detailed Brad Trowbridge's commitment to follow the ethical guidelines of the Illinois Bar and to zealously represent me. Brad Trowbridge did not represent my interest, and he fraudulently hid his misconduct from me so that I would not replace him with effective counsel. I do not believe there could be any burden to show that I exercised due diligence in such a corrupted proceeding.

20. Nevertheless, I did exercise due diligence in presenting a defense.

- A. In addition to retaining counsel, I followed all court orders in order to prevent a finding of contempt of court.
- B. When accused by Mr. Matt of committing contempt of court, I asked my attorney what the specific allegation was so that I could have an opportunity to refute it and produce evidence to clear my name. I asked my attorney if there was any evidence submitted demonstrating that I was in contempt of court so that I might have the opportunity to look at the evidence and provide explanation, counter-evidence or otherwise respond.
(EXHIBIT B). I was never provided with a specific allegation of contempt of court or had any exhibits presented to me.
- C. When the ruling of contempt was made I spoke to Bradley Trowbridge on the phone directly after the ruling, I specifically asked my attorney to appeal the ruling. He then advised me that it would be easier to file a motion to reconsider. Brad Trowbridge told me "I'll file a motion to reconsider". He did not advise me of any deadline in such action and at no time indicated that he was not preparing the motion.
- D. Brad Trowbridge withdrew as my attorney forty days after the judgment was entered without having filed a motion to reconsider. It was only when I hired another attorney that I learned it was then too late to move to reconsider this ruling.

D. I have exercised due diligence in filing the section 2-1401 Petition for Relief

19. For the same reason that I do not believe I face the normal burden to show due diligence in mounting a defense in the original action, as a lay person faced with fraud committed against me by both my attorney and trial judge, I do not believe I face any burden to demonstrate due diligence in filing a section 2-1401 petition because I remain under duress due to the continued involvement of Robert Johnson as trial judge in this case. I believe it is self-evident that a litigant who has been the victim of a crime by a party is curbed if not prevented from filing an action in which an individual against whom she has testified, alleging criminal activity, is the trier of fact.
20. Nevertheless I have exercised due diligence in filing this Section 2-1401 Petition for Relief.
- A. Between June, 2021 and now, I have reported my criminal allegations about Brad Trowbridge and Robert Johnson to federal law enforcement agencies on more than six occasions and provided abundant documentary evidence to these authorities, as well as my testimony under affidavit.
 - B. I have attempted on two occasions to have Robert Johnson transferred from this case so that I could have these matters heard by a neutral judge, I have also attempted to have this case transferred to another venue outside Cook County, again so I could access a neutral judge.
 - C. In October, 2021, I filed a federal whistleblower complaint to The IRS Criminal Investigation Unit disclosing Mr. Matt's financial crimes as well as the personal criminal acts I had witnessed by Robert Johnson, Michael Bender, Bradley Trowbridge, Kaye Mason, John Palen and others. I received two whistleblower

confirmation numbers in January, 2022 and understand these investigations to be ongoing.

- D. I have reported Robert Johnson, Bradley Trowbridge and Michael Bender to Chief Judge Timothy Evans, to The Executive Committee of The Circuit Court of Cook County and to former Presiding Judge Grace Dickler in the hope that they would ask the parties to stop committing crimes.
 - E. On two occasions I attempted to get federal injunctive relief by filing complaints in The Northern District of Illinois.
 - F. In all my efforts in filing criminal, civil rights and employee complaints against these parties, I was seeking to have Robert Johnson removed as trial judge so that I might have this matter heard by a neutral judge. Having exhausted all avenues I know of for relief, I am forced to file this petition while still under duress and fearful of Robert Johnson's continued retaliatory acts against me.
21. The discovery of a single act of fraud by a trial judge in a case is enough to render all his actions in the case void. The discovery of a single act of fraud by an attorney against his client in a case is enough to render all his activity fraudulent. For this reason the facts documented in this petition are basis to overturn the August 21, 2020 finding of contempt as well as to vacate all orders in this case subsequent to the appearance of Robert Johnson as trial judge in Case 2016 D 9534, which includes all rulings issued during the time that Bradley Trowbridge was my attorney of record.

WHEREFORE I ask that this court:

- A. Vacate the August 21, 2020 finding of contempt against me, Megan Mason, entered in this court.

- B. Vacate all rulings issued in this case by Judge Robert Johnson subsequent to the August 21, 2020 finding of contempt.
- C. Vacate all rulings issued in this case by Judge Robert Johnson prior to the August 21, 2020 finding of contempt.
- D. The basis of any fees ordered in this case subsequent to the appearance of Robert Johnson having been vacated, that all parties to whom Robert Johnson has ordered fees paid by Megan Mason be ordered to remit payment to Megan Mason in the amount of fees paid plus 3% annual interest, those fees having been fraudulently ordered. This includes but is not limited to:
 - a. All fees paid by Megan Mason to Michael Bender in the form of Guardian Ad Litem fees.
 - b. All fees paid by Megan Mason to Chrstopher Wehrman in the form of sanctions and court ordered attorneys' fees.
 - c. All fees paid by Megan Mason to Gerald Blechman in the form of custody evaluator fees.
 - d. All fees paid by Megan Mason to Jonathan Palen in the form of parent coordinator fees.
- E. That Bradley Trowbridge be ordered to remit payment to Megan Mason in the amount of all fees paid to him, those fees having been fraudulently obtained, plus 3% annualized interest.
- F. Any other relief that the court deems fit.

Respectfully Submitted By,
Megan Mason
Respondent Pro Se

FILED
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
21018126

**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

Megan Mason’s Affidavit in support of Section 2-1401 Petition

I did not know of the contempt allegation made against me which resulted in the August 21, 2020 ruling, specifically Peter Matt’s Petition for Rule to Show Cause, filed on March 10, 2020 and served at that time upon my attorney of record, Bradley Trowbridge, until July 20, 2020. On at least eight occasions between March 8, 2020 and July 20, 2020, Bradley Trowbridge directly lied to me or concealed the fact that a Petition for Rule to Show Cause had been filed alleging that I was in contempt of court. On two occasions he directly lied to me or did not disclose the allegation when I directly asked him if anything had been filed against me by opposing counsel. On six other occasions Mr. Trowbridge received communications from the court on my behalf, related to a scheduled hearing on this contempt allegation, and did not disclose the communications to me in order to further the fraud scheme.

I did not willfully and contumaciously defy a court order. Because of this there was no evidence presented that I had committed contempt of court. I now understand that the PRTSC should have

FILED DATE: 1/12/2023 1:49 PM 2016D009534

been dismissed on the face of it and am certain that if I had had effective counsel that a motion to dismiss would have been filed.

On July 21, 2020 Judge Robert Johnson fraudulently entered an order granting a pro se appearance on behalf of me, Megan Mason. I did not file a pro se appearance. I did not indicate to any person that I wished to appear pro se. At that time I believed Mr. Trowbridge to be my attorney and he did not indicate to me that he was not my attorney or intended to withdraw from the case at that time. I was not told about this pro se appearance. I only learned about the pro se appearance a year later when I learned what a docket is.

In June, 2021 when I learned what a docket is, I first learned about the pro se appearance filed fraudulently on my behalf on July 20, 2020. At that time I was told by an employee of the clerk that I, or rather someone purporting to be me, had filed the appearance online. As a lay person not trained in law, I did not then understand that this order had to be entered by a judge. I now understand from reviewing the docket that the order approving a fraudulent pro se appearance was in fact entered by Judge Robert Johnson. In this way I have recently come to understand that Robert Johnson was actively involved in Bradley Trowbridge's fraud.

Fraud continues and seems related to Peter Matt's financial crimes

Subsequent to the fraudulent acts that resulted in a contempt finding against me, without any evidence or legal basis, I have continued to experience and learn about more crimes committed by Robert Johnson and others involved in this case. Specifically, Robert Johnson and other parties have conspired in my former husband's acts of tax evasion and money laundering, which suggests they may themselves be financial beneficiaries to his schemes.

Since 2012 I have known that my former husband, Peter Matt, engages in acts of tax evasion and money laundering. He owns three companies - Goedecke and Associates Germany,

Goedecke Poland, and Goedecke India - which he refuses to disclose to the IRS or to the court. He also owns and controls financial instruments and accounts in excess of \$1 million which he refuses to disclose to the IRS or to the court. In order to repatriate assets hidden abroad he has used transfers disguised as gifts and loans from his wealthy father. He maintains a Wintrust account that is jointly controlled with his father for this purpose. Recently he has started involving our minor children in these schemes. It was largely because of fear of financial and criminal damages that I first separated from Mr. Matt.

I have acted under duress and am presently acting under duress

Since May, 2021, when Robert Johnson and Michael Bender blocked any hearing on an allocation of fees in order to hide Peter Matt's financial crimes, I have been terrified of what they might do to me for disclosing his crimes. I believed that if they were not co conspirators with Mr. Matt before they hid his federal financial crimes, they most certainly were afterward. I have tried to be as public and transparent as possible about the corruption that I have experienced so that parties might not have a reason to intimidate, threaten or silence me. Nevertheless, parties have brazenly sought to intimidate, silence and punish me for my testimony.

I continue to face sanctions for my truthful testimony, I have had my parental rights revoked in a ruling that, again, was not based on evidence or facts. I have been prevented from even contacting my children, based on no evidence or facts. As of this writing, Michael Bender is seeking to have me incarcerated.

Since the first act of criminal conspiracy to defraud me, the court and The United States Government by parties involved in the course of this case, I have been under constant duress. Since it's impossible to tell when the fraud began, every aspect of this case since the appearance of Robert Johnson, in the role of trial judge, must be regarded as occurring under duress. I

continue to act in fear for my safety, liberty, well being and in fear for the well being of my children due to Robert Johnson's ongoing criminal acts under color of state law.

1/12/2022

Signature

Date

Name: Megan Mason

Pro Se Address

City, State,

Telephone:



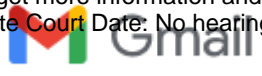
SUBSCRIBED AND SWORN TO BEFORE ME this 12th day of January, 20 23.

Lauren N. Kelly Notary Public



FILED DATE: 1/12/2023 1:49 PM 2016D009534

All Domestic Relations cases will be heard by phone or video.
Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8XV6S1B%3B&portalid=0>
to get more information and Zoom Meeting IDs.
Remote Court Date: No hearing scheduled



Megan M [REDACTED]
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Mon, Jan 20, 2023 at 3:02 PM
21018126

Re: New Bill from Caesar & Bender, LLP

Megan Mason <[REDACTED]>
To: Brad Trowbridge <brad@bradtrowbridge.com>

I didn't see any evidence. I don't understand what he wants. I

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All Domestic Relations cases will be heard by phone or video.
 Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcSi8E%3d&portalid=0>
 to get more information and Zoom Meeting IDs. **EXHIBIT C**
 Remote Court Date: No hearing scheduled

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 1/12/2023 1:49 PM
 IRIS Y. MARTINEZ
 CIRCUIT CLERK
 COOK COUNTY, IL
 2016D009534
 Calendar, 23
 21018126

THE LAW OFFICES OF
BRADLEY R. TROWBRIDGE
 3257 NORTH SHEFFIELD AVENUE, SUITE 104
 CHICAGO, ILLINOIS 60657

INVOICE: MEGAN MASON

DATE	EE	ACTIVITY	DESCRIPTION	RATE	HOURS	LINE TOTAL
6/13/19	BT	Payment	[REDACTED]			[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

FILED DATE: 1/12/2023 1:49 PM 2016D009534

Exhibit C Continued

3/10/20	BT	Time Charge	Review Petition for Rule to Show Cause	\$300.00	.10	-\$30.00
		BALANCE				\$200.00

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Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcS8K%3D&portalid=0>
to get more information and Zoom Meeting IDs.
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EXHIBIT D



Megan M <[REDACTED]>
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
Wed, Apr 15, 2020 at 2:39 PM

Invoice

6 messages

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

Brad Trowbridge
The Law Offices of Bradley R. Trowbridge
3257 N. Sheffield Suite 104
Chicago, IL 60657
P: 773-784-9900
E: brad@bradtrowbridge.com

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 **Invoice 1.pdf**
106K

Megan Mason <[REDACTED]>
To: Brad Trowbridge <brad@bradtrowbridge.com>

Wed, Apr 15, 2020 at 10:31 AM

Hi Brad,

I hope you're well and your clients are not suffering too badly from the quarantine. I'm personally quite pleased that no motions are being filed right now, a nice break =).

Please run the attached cc for the \$200 balance.

Thanks,
Megan
[Quoted text hidden]

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <megan42@gmail.com>

Wed, Apr 15, 2020 at 11:19 AM

Hi Megan. Yes, unfortunately, it took a pandemic to stop Peter's legal abuse of you! I don't think there's a cc attached unless there's a glitch on my end. Stay well!

Brad Trowbridge
The Law Offices of Bradley R. Trowbridge
3257 N. Sheffield Suite 104
Chicago, IL 60657
P: 773-784-9900
E: brad@bradtrowbridge.com

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Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcS8E%3d&portalid=0>
to get more information and Zoom Meeting IDs.
Remote Court Date: No hearing scheduled



Megan M <[REDACTED]>
7/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23

Re: New Bill from Caesar & Bender, LLP

13 messages

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

Mon, Jul 13, 2020 at 12:37 PM

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?

On Sun, Jul 12, 2020, 12:25 PM Megan Mason <[REDACTED]> wrote:
Zoom court? What?

----- Forwarded message -----
From: **Caesar & Bender, LLP** <notifications@clio.com>
Date: Sun, Jul 12, 2020 at 12:18 PM
Subject: New Bill from Caesar & Bender, LLP
To: Megan Mason <[REDACTED]>



Caesar & Bender, LLP

Dear Megan Mason,
Your bill is ready. You can view it in the attachment.

Account summary

Amount due on Invoice 4768	\$455.00
Due date: 07/12/2020	
Amount due on 3 other invoices	\$1,333.50
Total amount due	\$1,788.50

[Pay online now](#)

The payment link will expire in 90 days upon receipt.

FILED DATE: 1/12/2023 1:49 PM 2016D009534

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Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcS18E%3d&portalid=0>
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Remote Court Date: No hearing scheduled

EXHIBIT F

Megan M [REDACTED]

FILED

1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK

COOK COUNTY, IL
Mon, Jul 20, 2020 at 2:46 PM
2016D00934
Calendar, 23
21018126

Court
1 message

Megan Mason [REDACTED]
To: Brad Trowbridge <brad@bradtrowbridge.com>

Hi Brad,
Did Michael make a motion to be removed? Anything filed against me?
M

FILED DATE: 1/12/2023 1:49 PM 2016D00934

All Domestic Relations cases will be heard by phone or video.
Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcS8E%3d&portalid=0>
to get more information and Zoom Meeting IDs.
Remote Court Date: No hearing scheduled

EXHIBIT C



Megan M <[REDACTED]>
FILED
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Mon, Jan 20, 2023 at 9:15 AM
21018126

Re: New Bill from Caesar & Bender, LLP

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

Mon, Jan 20, 2023 at 9:15 AM
21018126

Peter filed this and it was supposed to be up in April when courts were closed. We were given time today to respond to it so I need input from you about how to respond.

Brad Trowbridge
The Law Offices of Bradley R. Trowbridge
3257 N. Sheffield Suite 104
Chicago, IL 60657
P: 773-784-9900
E: brad@bradtrowbridge.com

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[Quoted text hidden]

 **PRTSC.pdf**
604K

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Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcSi8E%3d&portalid=0>
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Remote Court Date: No hearing scheduled

EXHIBIT H

FILED
1/12/2023 1:49 PM
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CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
21018126

Diploma

Megan Mason

successfully completed

Preventing Money Laundering

2/11/2020

Jefferies

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CONTROL ID: SERAMWOUGAXLQZENTAYB

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All Domestic Relations cases will be heard by phone or video.
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to get more information and Zoom Meeting IDs.
Remote Court Date: No hearing scheduled

EXHIBIT I

FILED
1/12/2023 1:49 PM
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CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
21018126

This certificate is awarded to

Megan Mason

for the successful completion of the course

Anti-Bribery Training 2019

By SAI Global

Date: 2/11/2020


Charles W. Coy, Director

FILED DATE: 1/12/2023 1:49 PM 2016D009534

All Domestic Relations cases will be heard by phone or video.
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to get more information and Zoom Meeting IDs.
Remote Court Date: No hearing scheduled



Megan M. [REDACTED]
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

IRMO Matt; 2016 D 9534; COURT ORDER

John Palen <jpalen@johnpalenphd.com>
To: "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>, Megan Mason <[REDACTED]>
Christopher Wehrman <cwehrman@smbtrials.com>
Cc: Laura Fried <lfried@smbtrials.com>, Michael I Bender <mbender@caesarbenderlaw.com>

Sat, Dec 9, 2023 at 1:53 PM

I want to be paid. It is as simple as that

JOHN M. PALEN, PH.D., LCSW

<http://www.johnpalenphd.com>

- Psychotherapy with Older Children, Adolescents, Adults and Families
- Therapy with Children Resisting Contact with a Parent
- Co-Parenting Counseling
- Parenting Plan Consultation/Child Custody Evaluation
- Individual and Family Counseling with Members of the LGBTQ Community and their Families.
- Consultation with Men attempting to become better Partners, Husbands and Fathers

5225 Old Orchard Road, Suite One

Skokie, Illinois 60077

T: 847-967-1695

Please be advised that because e-mail is not a secure form of communication I cannot ensure confidentiality of any information sent by email. Nevertheless, this message (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, is intended to be confidential, and may be privileged. If you are not the intended recipient, please be aware that any retention, dissemination or distribution is prohibited, . Please reply to sender if you have received this message in error, then kindly delete it. Thank you for helping to maintain privacy.

FILED DATE: 1/12/2023 1:49 PM 2016D009534

All Domestic Relations cases will be heard by phone or video.
Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcSi8E%3d&portalid=0>
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Remote Court Date: No hearing scheduled



Megan M <[REDACTED]>
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

IRMO Matt; 2016 D 9534; COURT ORDER

John Palen <jpalen@johnpalenphd.com>
To: "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>, Megan Mason <[REDACTED]>
Christopher Wehrman <cwehrman@smbtrials.com>
Cc: Laura Fried <lfried@smbtrials.com>, Michael I Bender <mbender@caesarbenderlaw.com>

Sat, Dec 9, 2023 at 1:58 PM

Sorry- this was meant for another case. I had not noticed Ms. Mason on the list of recipients.

Regards,

John Palen

[Quoted text hidden]

FILED DATE: 1/12/2023 1:49 PM 2016D009534

All Domestic Relations cases will be heard by phone or video.
Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=C7A6KAcSi8E%3d&portalid=0>
to get more information and Zoom Meeting IDs.
Remote Court Date: No hearing scheduled

FILED DATE: 1/12/2023 1:49 PM 2016D009534



Megan M [REDACTED]
1/12/2023 1:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Truing up parenting plan for parenting time

peter@goedecke.com <peter@goedecke.com>
To: Megan Matt [REDACTED]
Cc: John Palen <jpalen@johnpalenphd.com>

Tue, May 16, 2023 at 11:26 AM
Calendar 21018126

Hi Megan,
I talked with John on the below last week. He believes it is not necessary since he is already advising us on the scheduling and we don't have any conflict on this. If one of us would violate the schedule he would step in. In this regard the parenting plan is trued up and in place for about 5 years, I believe. I understand that you are upset about May 2nd, when dropped the kids late. Can we talk about this in our next meeting with John, which should be in about 2 weeks?

Further, I talked to Ar [REDACTED] Orthodontist. They refunded us \$500 of the \$1,000 deposit. They are saying they cannot refund us the other \$500 as it has paid for the panorex xray, lateral cephalometric and Dr's diagnostic treatment planning. This is understandable and ok from my side.

I also did a business plan, as suggested by John, for A [REDACTED] becoming the main shareholder of Goedecke so the company would get a Disability Supplier Diversity Certification. Please see attach and comment. To address your specific concerns how it would impact A [REDACTED] entitlements, I should guarantee that you or Angus would not have any financial disadvantages and most likely once A [REDACTED] would turn 18 and eligible for SSDI, we would reverse A [REDACTED] ownership and control.

Regards,
Peter
[Quoted text hidden]

Goedecke Business Plan with Angus.pdf
69K

Goedecke and Associates, Inc.

FILED

1/12/2023 1:49 PM

IRIS Y. MARTINEZ

CIRCUIT CLERK

COOK COUNTY, IL

2016D009534

Case No. 23-01126

01/12/2023

FILED DATE: 1/12/2023 1:49 PM 2016D009534

<p>Identity</p> <p>Goedecke offers high-quality, fast and reliable procurement service of IT, banking and POS spare parts. With A [REDACTED] as the new owner and decision maker Goedecke will become a diversified supplier certified by DisabilityIN. Angus will learn valuable life skills.</p>	<p>Problem</p> <p>Large, publicly listed maintenance and repair organizations are looking for high-quality spare parts and their fast delivery. As part of their social responsibility commitments to the shareholders these companies are looking to do business with companies that have a <i>Supplier Diversity Certification</i>.</p>
<p>Our solution</p> <p>Our decades old organization acquired a large database of vendors that enables us to offer new and end-of-life parts to our customers. We can procure high quality parts quickly for a good price due to our long standing relationships, while being supplier diversity certified.</p>	<p>Target market</p> <p>Large and global maintenance and repair organizations that are looking to outsource parts of their purchasing and supply chain processes in a social responsible way.</p>
<p>The competition</p> <p>We are specialized in hard-to-find and end-of-life spare parts since many years and have built deep relationships with our business partners. Other companies that can offer such customized service are similar small and flexible companies like TeamOne, Redsis, RMC International.</p>	<p>Revenue streams</p> <p>Goedecke sells directly to customers by responding to their daily RFQs. A [REDACTED] salary, as well as any distributions should remain with Peter. Megan should have no claim to any of the money or shares even in case of the death of A [REDACTED]. Megan shall not impact the business in any way.</p>
<p>Marketing activities</p> <p>Goedecke will search the internet for other public opportunities to respond to those RFQs invitations.</p>	<p>Expenses</p> <ul style="list-style-type: none"> • Labor to search parts and offer them to the customers after applying a margin • Shipping and packing material cost • Space for inventory, test and repacking the products
<p>Team and key roles</p> <p>Currently, the team members are:</p> <ul style="list-style-type: none"> • Peter Matt, the current 100% owner, 12 years tenure • Leo Matt and family in Germany • Hemendra (8 years), Pratik (8 years), Shashikant (6 years) and Jalpa (5 years) in India <p>A [REDACTED] is familiar with all the team members.</p>	<p>Milestones</p> <p>As the business matures, Goedecke will improve its on-time-shipment performance, will get invited to more RFQ opportunities due to its diversified status and will on-board new clients.</p> <p>Once A [REDACTED] becomes eligible for SSDI and/or in case his ownership is no longer beneficial as been decided by Peter, his shares and title should fall back to Peter.</p>