

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

FILED  
3/7/2023 12:00 AM  
IRIS Y. MARTINEZ  
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FILED DATE: 3/7/2023 12:00 AM 2016D009534

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 MOTION TO DISMISS PETER MATT’S “PRTSC RE BUSINESSES” FILED  
3.3.23 IN THIS COURT**

I, Megan Mason, respondent pro se in case 2016 D 9534 move that the court dismiss with prejudice Peter Matt’s  
Petition for Rule to Show Cause filed in this court on March 3, 2023 because Mr. Matt has alleged that I have  
done damage to businesses that do not exist. There being no business interests for me to damage, it is  
impossible that I could have violated an order barring me from damaging Mr. Matt’s businesses in any case  
where said businesses do not exist. In support thereof I state as follows:

1. I agree the parties were married on January 24, 2007 in New York.
2. I agree that as a result of our marriage two children were born; namely A [REDACTED] 2008; and  
T [REDACTED] 2012.
3. I agree that on September 27, 2017 a Judgment for Dissolution of Marriage (Judgment), incorporating a  
Marital Settlement Agreement, was entered in this matter, thereby dissolving the bonds of matrimony  
between the parties.

4. I agree that Article V, Paragraph F (2) of the MSA awarded businesses named in that document on September 27, 2017. I do not have enough information to confirm whether or not these business entities or related assets, bank accounts, documents or other referenced items existed at the time of entering into the MSA. However, based on Mr. Matt's tax filings and financial affidavits filed in this court I know that the assets either did not exist or were not in Mr. Matt's control as of 2018. Namely,
- a. In 2018 Mr. Matt did not file any FBARs with his federal tax return as are filed when a US tax filer owns or controls a foreign bank account. So as of at least December 31, 2018, according to Mr. Matt's signed tax return previously filed in this court, Mr. Matt did not have any foreign businesses or assets, which includes Goedecke Germany, Goedecke Poland or Goedecke India. According to this same tax return, Mr. Matt did not receive any salary which means since at least January 1, 2018 he was not working full time on US based Goedecke Inc. because he did not report any income or salary. Mr. Matt did claim to receive a very modest business income with this filing but at the same time, according to his tax return, he was not full time owner of any of the businesses he claimed to own at the time of the parties' divorce. Therefore none of the businesses he claimed to own at that time can be protected by the Marital Settlement Agreement. (Exhibit E Peter's Redacted 2018 Tax Filing).
  - b. In Mr. Matt's signed financial affidavit filed in this court on July 3, 2019 he claims to own 100% of a business called Goedecke and Associates Inc. which he claims to be valued at \$50,000, but does not report any foreign business ownership (Exhibit F Peter's 2019 Financial Affidavit). In this same affidavit Mr. Matt claimed to the court to have \$0 bank accounts and to earn \$27,000 annually, which shows that since at least July 3, 2019 any marital assets Mr. Matt have sought to protect through legal action had obviously been depleted of any value, making this action spurious.
  - c. On October 6, 2022, Mr. Matt filed another signed financial affidavit in this court (Exhibit G 2022 Financial Affidavit). With this affidavit Mr. Matt again claims to own a business called

Goedecke and Associates Inc. valued at \$50,000 and a company called Goedecke Germany valued at \$0. Again, because Mr. Matt filed multiple tax returns that omitted any foreign business interests since the time of our divorce, it's not possible that Goedecke Germany (omitted from 2018 taxes and 2019 financial affidavit), Goedecke India and Goedecke Poland can be protected or the basis of any legal action, as they ceased to exist following our divorce, according to Mr. Matt's own statements.

- d. Although Mr. Matt has indicated a business interest in a company called Goedecke and Associates, he does not receive a salary from any company called Goedecke and Associates and has not done so in many years, so he cannot claim to be the chief executive of a successful business called Goedecke and Associates. In fact in 2022 Mr. Matt claims a monthly salary of \$800. It's simply not possible for Mr. Matt to repeatedly swear his penury under affidavit to this court and in signed tax forms submitted to the IRS and to then to later claim damages to supposedly successful businesses.

Based on Mr. Matt's own affidavits or signed tax returns, the business entities named at the time of the parties divorce in 2017 either do not exist or are of negligible value as of this writing. I demand strict proof of the existence of any business entity of value if Mr. Matt is to claim that I have damaged any business entity.

5. Respondent agrees that Article V, Paragraph F(2)(ii) provides that respondent will not interfere with a business entity called Goedecke but Respondent again points out that a business entity called Goedecke does not exist according to Mr. Matt's tax filings and sworn financial affidavits.
6. Respondent vehemently disagrees that she has ever or is in this case violating court orders and denies the disparagement of her character. Respondent maintains that she has always adhered to court orders.

7. Respondent strongly disagrees that she has ever endangered her children and denies any legal basis for a protective order though she admits that an order was entered by Robert Johnson in this court.  
Respondent acknowledges an exuberant number of orders from Robert Johnson in this case.
8. Respondent agrees that Mr. Matt filed a petition for child support.
9. Respondent admits she filed a response to this petition.
10. Respondent denies that her counter-claim was undefined and inarticulate. Respondent amidst that she filed copies of two of the many whistleblower letters, FBI complaints and emails to the department of justice she has authored in relation to Mr. Matt's financial crimes and acts of corruption by other parties involved in this case.
11. Respondent admits that a letter dated October 4, 2021 to the Illinois Department of Revenue was called a First Whistleblower letter but notes it was not the first letter she sent, that would have been an October, 2021 whistleblower letter to The Internal Revenue Service. Respondent admits that she mailed a second letter to the IRS after she received a request for more information, it was the copy of the letter sent at this time that was filed with the counterclaim. Respondent notes that she received two whistleblower numbers in a letter at a later date.
12. Respondent admits that in her second whistleblower letter she provided more detail about her testimony as a witness to Peter Matt's financial crimes, including his acts of tax evasion, payroll tax fraud, violations of labor laws, and his use of fraudulent business expenses.
13. Respondent denies that an Illinois court has the authority to issue any order that could bar a federal criminal witness from providing truthful testimony about federal crimes she has witnessed. Respondent invokes her right to protection as a federal whistleblower. Respondent again notes that Mr. Matt is seeking to be protected from and compensated for damages to assets that do not exist according to his own statements to this court.
14. Respondent denies she has ever violated court orders but respondent admits that Robert Johnson has previously entered orders allowing a finding of contempt of court.

15. Respondent denies she has ever violated court orders but respondent admits that Robert Johnson has previously entered orders allowing a finding of contempt of court.
16. Respondent denies she has ever engaged in contumacious behavior and denies there was ever a basis presented to this court to revoke her parental rights. Respondent denies that Mr. Matt is legally the sole caretaker of their minor children and respondent denies that Mr. Matt is legally or in fact the sole financial provider to the children. Respondent notes that she entered into a mutually agreed upon parenting plan on September 27, 2017 which awards her 50% parenting time and parental rights. Respondent notes that she pays for housing and utilities for a home that is the children's residence 50% of the time by court order. Respondent notes that she pays for all of the health insurance as well as 50% of transportation, food and other expenses for the children's benefit per parenting plan.
17. Respondent denies engaging in vexatious conduct and denies the baseless disparagement of her character. Respondent notes that there is not a basis in fact to allege an impairment in her mental health and notes that no evidence of mental unfitness has ever been presented to this court, exuberant judicial actions notwithstanding.
18. Respondent denies ever violating court orders.
19. Respondent denies there is a basis for a finding of contempt of court. Respondent again notes the nonexistence of an asset called Goedecke according to Petitioner's own court findings. Respondent also notes the impossibility of a purge if there is not a violation of court order that can be rectified. As a lay person it is respondent's understanding that this court may only find parties culpable for civil contempt of court, not criminal, and that in any finding of civil contempt a party must have the keys to her own jail cell. Since Goedecke doesn't exist, I cannot stop disparaging it and cannot purge a contempt finding.
20. Respondent agrees that in legitimate cases of contempt of court attorneys' fees may be awarded but denies that this action is legitimate.

10.(sic) Respondent denies that Peter Matt has been forced to pay any fee since his action is spurious and ought to be on the face of it dismissed.

**WHEREFORE, Respondent asks that this court.**

- A. Enter an order instanter immediately dismissing with prejudice Peter Matt's Petition for Rule to Show Cause filed in this court on March 3, 2023.
- B. Any other relief that the court deems fit.

Respectfully Submitted by,

Megan Mason

Respondent Pro Se

