

18-1251

No.

In The
Supreme Court of the United States

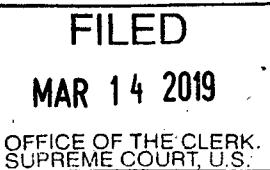
THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, SERVANT:
XIU JIAN SUN, THE SPIRITUAL ADAM

Petitioner,

v.

PHILIP O. OHENE;
ATTORNEY FROM PHILIP O OHENE ESQ

Respondent.



On Petition for Writ of Certiorari to the
State of New York Court of Appeals

BRIEF FOR PETITIONER

The Church of Jesus Christ of Latter-day saints
Servant: Xiu Jian Sun, the spiritual Adam
54-25 153rd St.,
Flushing, NY 11355
646-675-0308

Counsel for Petitioner

QUESTION(S) PRESENTED

1. Lord god of host sent the messenger through angel said to spiritual Adam: "**take him (her) to the law to confront it.**" (把他 (她) 带到法律面前去) Attorney for Defendants Dick Bailey service INC Bill & Lynne Bailey.
2. Jehovah, - the Lord god of host gives the words to servant (Plaintiff) in the temple he made, "**Trial with god's law. Apply for jury to prevent insult and unfair behavior.**"
3. A Book of Doctrine and Covenants Section 101
 - 81) Now, unto what shall I liken the children of Zion? I will liken them unto the parable of the woman and the unjust judge, for men ought always to pray and not to faint, which saith—
 - 82) There was in a city a judge which feared not God, neither regarded man.
 - 83) And there was a widow in that city, and she came unto him, saying: Avenge me of mine adversary.
 - 84) And he would not for a while, but afterward he said within himself: Though I fear not God, nor regard

man, yet because this widow troubleth me I will avenge her, lest by her continual coming she weary me.

85) Thus will I liken the children of Zion.

86) Let them importune at the feet of the judge;

87) And if he heed them not, let them importune at the feet of the governor;

4. On the date of March 1st, 2019, send to Mr. Andrew M. Cuomo, the incumbent Governor of New York State, NYS State Capitol Building, Albany, NY 12224, by registered mail and return receipt. (Brief for Plaintiff-Appellant)

LIST OF PARTIES

Petitioner:

The Church of Jesus Christ of Latter-day saints
Servant: Xiu Jian Sun, the spiritual Adam

Respondent:

Philip O. Ohene;
Attorney from Philip O. Ohene Esq

**Apply for a Mandarin
Chinese interpreter**

Clerk's Office:

I (Servant) Petitioner would like to request a Mandarin Chinese court interpreter for my appeal court day.

Thank you.

The Church of Jesus Christ of Latter-day saints
Servant: Xiu Jian Sun, the spiritual Adam

TABLE OF CONTENTS

QUESTION(S) PRESENTED.....	i
LIST OF PARTIES.....	iii
Apply for a Mandarin Chinese interpreter.....	iv
JURISDICTION:	
State of New York Court of Appeals (Decided and Entered 02/14/2019)	1
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	5
REASONS FOR GRANTING THE WRIT	6
CONCLUSION	7

INDEX TO APPENDICES**Appendix A:**

State of New York Court of Appeals (Letter from Supreme court Albany. December 5, 2018)	A1
---	----

Appendix B:

Supreme Court of the State of New York
Appellate Division: Second Judicial
Department: December 12, 2017 letter
with new case number from Appellate court. B1

Supreme Court of the State of New York
Appellate Division: Second Judicial
Department: (2017-12815 Decision &
Order on Motion) B4

Appendix C:

Supreme Court of the State of New York
County of Richmond (100041/ 2017,
Decision & Order November 3, 2017) C3

Appendix D:

Answer: Information of defendant attorney
Philip O. Ohene filed 09/21/2017 D1-D3

Affirmation in Support of Dismissal of Complaint,
Motion to Dismiss filed 09/25/2017,
Information of defendant attorney
Philip O. Ohene D4 - D10

JURISDICTION

STATE OF NEW YORK COURT OF APPEALS

**Decided and Entered on the
forteenth day of February, 2019**

Present, Hon. Janet DiFiore, Chief Judge, Presiding.

SSD 2

The Church of Jesus Christ of Latter-Day Saints

Servant: Xiu Jian Sun, &c.,

Appellant,

v.

Philip O. Ohene, &c.,

Respondent.

Appellant having appealed to the Court of Appeals
in the above title;

Upon the papers filed and due deliberation, it is

ORDERED, that the appeal is dismissed without
costs, by the Court sua sponte, upon the ground that no
substantial constitutional question is directly involved.

John P. Asiello
John P. Asiello
Clerk of the Court

STATE OF NEW YORK COURT OF APPEALS

John P. Asiello
Chief Clerk and
Legal Counsel to the Court

Clerk's Office
20 Eagle Street
Albany, New York 12207-1095

Decided February 14, 2019

SSD 2

The Church of Jesus Christ of Latter-Day Saints
Servant: Xiu Jian Sun, &c.,
Appellant,

v.
Philip O. Ohene, &c.,
Respondent.

Appeal dismissed without costs, by the Court sua
sponte, upon the ground that no substantial
constitutional question is directly involved.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

1. The Doctrine and Covenants Section 20

Revelation on Church organization and government, given through Joseph Smith the Prophet, at or near Fayette, New York. Portions of this revelation may have been given as early as summer 1829. The complete revelation, known at the time as the Articles and Covenants, was likely recorded soon after April 6, 1830 (the day the Church was organized). The Prophet wrote, "We obtained of Him [Jesus Christ] the following, by the spirit of prophecy and revelation; which not only gave us much information, but also pointed out to us the precise day upon which, according to His will and commandment, we should proceed to organize His Church once more here upon the earth."

1). The rise of the Church of Christ in these last days, being one thousand eight hundred and thirty years since the coming of our Lord and Savior Jesus Christ in the flesh, it being regularly organized and established agreeable to the laws of our country, by the will and commandments of God, in the fourth month, and on the sixth day of the month which is called April—

2. The Doctrine and Covenants Section 42

83). And thus ye shall do in all cases which shall come

before you.

84). And if a man or woman shall rob, he or she shall be delivered up unto the law of the land.

85). And if he or she shall steal, he or she shall be delivered up unto the law of the land.

86). And if he or she shall lie, he or she shall be delivered up unto the law of the land.

87). And if he or she do any manner of iniquity, he or she shall be delivered up unto the law, even that of God.

88). And if thy brother or sister offend thee, thou shalt take him or her between him or her and thee alone; and if he or she confess thou shalt be reconciled.

89). And if he or she confess not thou shalt deliver him or her up unto the church, not to the members, but to the elders. And it shall be done in a meeting, and that not before the world.

90). And if thy brother or sister offend many, he or she shall be chastened before many.

91). And if any one offend openly, he or she shall be rebuked openly, that he or she may be ashamed. And if he or she confess not, he or she shall be delivered up unto the law of God.

STATEMENT OF THE CASE

1. The Lord god of hosts sent messenger through the angel said to servant: 'Pharisees don't even open the door'. (法利赛人连门都不开)
2. Jehovah, the Lord god of host, sent the son of god, (the revived Messiah) from God's temple gave words to servant, said: "Pharisees not even move his one finger". (法利赛的人一个手指头都不动)
3. The Lord god Jehovah sent the messenger, said to spiritual Adam through the angel, 'unjust judge'. (不公正法官)
4. The lord god of hosts sent the messenger to the spiritual Adam through angel, saying: "The Pharisees have appropriated widow's possessions". (法利赛人侵吞寡妇的财产)
5. Jehovah, the Lord of the host, sent the messenger said to servant: "Woe unto the Pharisees and the lawyers". (法利赛人和律法师有祸了)
6. The Lord god of hosts sent messenger speaks to spiritual Adam- plaintiff, through the angel, says: 'Pharisees even swallowed dead people's bones'. (法利赛人连死人的骨头都吐下去)

REASONS FOR GRANTING THE WRIT

After ruling by the Small Claim Court, these are the works given by Israeli God from Lord's temple, "The civil magistrate should restrain crime, but never control conscience, should punish guilt, but never suppress the freedom of the soul." (政府長官應該制止罪行, 但絕不可控制良心; 應該懲罰罪惡, 但絕不可壓制靈魂的自由)

CONCLUSION

The Doctrine and Covenants Section 42

92. If any shall offend in secret, he or she shall be rebuked in secret, that he or she may have opportunity to confess in secret to him or her whom he or she has offended, and to God, that the church may not speak reproachfully of him or her.
93. And thus shall ye conduct in all things.

Dated: Queens, New York
March 12, 2019

The Church of Jesus Christ of
Latter-day saints
Servant
Xiu Jian Sun, the spiritual Adam
54-25 153rd St
Flushing, NY 11355
(646) 675-0308
Plaintiff