

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.

The Pharisees Even Swallowed Up Camels:
JON O. NEWMAN, JOSÉ A. CABRANES,
CATHERINE O'HAGAN WOLFE, ROBERT
A. KATZMANN, DANA DOWOOD
Respondents.

**On Petition for Writ of Certiorari to the United
States Court of Appeals for the Second Circuit**

BRIEF FOR PETITIONER

The Church of Jesus Christ of Latter-day saints
Servant: Xiu Jian Sun, the spiritual Adam
54-25 153rd St., 2FL
Flushing, NY 11355
646-675-0308
Counsel for Petitioner

QUESTION(S) PRESENTED

The complaint of the plaintiff, -god's servant, Xiu Jian Sun, the spiritual Adam respectfully shows and alleges as follows

1. Jehovah, -the Lord God of host, sent the messenger through angel said to spiritual Adam: “**the Pharisees even swallowed up camels¹.**” 11/25/2017. (法利赛人连骆驼都吞下去), (Docket #: 16-3557-cv)
2. 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

¹. Appendix C: C13; Case 1:18-cv-04010-VSB

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**;

3. On the date of March 09, 2017, when the notification from United States District Court Eastern District of New York is received, Jehovah, -the Lord god of host sent the messenger speaks to spiritual Adam, -plaintiff through angel, says: **"Pharisees don't even open the door"**² (法利赛人连门都不开)

4. November 26th-27th, 2012. the Lord god of host Jehovah sent the messenger said to servant (Plaintiff) through the angel: "Did not keep promise".(没有信守承诺)

5. 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."**

² Civil Docket for Case #: 1:16-cv-01083- ENV-CLP, Court of Appeals Docket #: 16-950;

LIST OF PARTIES

Petitioner:

The Church of Jesus Christ of Latter-day saints

Servant: Xiu Jian Sun, the spiritual Adam

Respondents:

The Pharisees Even Swallowed Up Camels:

Jon O. Newman, José A. Cabranes, Catherine O

Hagan Wolfe, Robert A. Katzmman, Dana Dowood

**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

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United States Court of Appeals for the Second Circuit: 18-1640 18-1640 Docket, General Docket	A1
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Appendix B:

Notice of Civil Appeal, and district court docket, on behalf of Petitioner Xiu Jian Sun, Received	B1-B2, C29, C1-C11
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District Court Order of Dismissal, dated 05/21/2018	B4 - B10
Electronic Index, in lieu of record ..	B11 - B13, C1 -C11
Order, dated 06/01/2018, dismissing appeal by 06/22/2018, unless Petitioner Xiu Jian Sun, submits motion for leave to appeal, copy to pro se	B14 - B15
Letter, on behalf of Respondent Jose A. Cabranes, Dana Dowood, Robert A. Katzmann, Jon O. Newman and Catherine O'Hagan Wolfe, informing the Court at this time the respondents do not intend to participate in the appeal unless requested to do so by the Court, Received. Service date 06/19/2018 by CM/ECF, US mail	B16 – B18
Acknowledgment and Notice of Appearance, on behalf of Respondent Jose A. Cabranes, Dana Dowood, Robert A. Katzmann, Jon O. Newman and Catherine O'Hagan Wolfe, Filed. Service date 06/19/2018 by CM/ECF, US mail	B19 - B21
Caption, to refelect the correct spelling of Dana Ellwood, Amended	B22

New Case Manager, Atasha Joseph, Assigned B23

Certified Copy of Order, dated 06/01/2018,
determining the appeal to SDNY, ISSUED . B23-B24

Appendix C:

U.S. District Court Southern District of New
York Docket Sheet C1 – C11

Complaint against Jose A. Cabranes, Dana
Dowood, Robert A. Katzmman, Jon O.
Newman, Catherine O'Hagan Wolfe C12 – C15

Civil Cover Sheet filed C16 – C24

Summons Issued (Summons in a Civil
Action) C25 – C28

Notice of Appeal, Certificate of Service ... B1 – B2, C29

Mandate of USCA (Certified Copy) as to 10
Notice of Appeal, filed by The Church of
Jesus Christ of Latter-Day Saints, Servant:
Xiu Jian Sun, the Spiritual Adam USCA
Case Number 18-1640. On December 13,
2017 this Court entered an order in Sun v.
Dillon, 16-3557 requiring appellant to file
a motion seeking leave of this Court prior
to filing any future appeals. A notice of
appeal in the above referenced case was
filed. The Court has no record that

appellant sought the Court's permission to appeal prior to filing the notice of appeal. It Is Hereby Ordered that this case is dismissed effective June 22, 2018, unless a motion seeking leave of this Court is filed by that date. Catherine O'Hagan Wolfe, Clerk USCA for the Second Circuit. Issued As Mandate: 7/17/2018..... C30 – C31

Bar Order Under 28 U.S.C. § 1651: The Clerk of Court is directed to mail a copy of this order to Plaintiff, and note service on the docket. The Court bars Plaintiff from filing future civil actions in this Court without first obtaining from the Court permission for leave to file. See 28 U.S.C. § 1651. Plaintiff must attach a copy of his proposed complaint and a copy of this order to any motion seeking leave to file. The motion must be filed with the Pro Se Intake Unit of this Court. If Plaintiff violates this order and files an action without first filing a motion for leave to file, the Court will dismiss the action for failure to comply with this order. Plaintiff is further warned that the continued submission of frivolous documents may result in the imposition of additional sanctions, including monetary penalties. See *id.* The Clerk is

directed to close this action. The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that any appeal from this order would not be taken in good faith and therefore in forma pauperis status is denied for the purpose of an appeal. Cf. *Coppedge v. United States*, 369 U.S. 438, 444-45 (1962). So Ordered. (Signed by Judge Vernon S. Broderick on 8/21/2018) (rro) Transmission to Docket Assistant Clerk for processing. Transmission to Office of the Clerk of Court for processing C32 – C34

Civil Judgment: It is Ordered, Adjudged and Decreed that the complaint is dismissed under 28 U.S.C. § 1915(e)(2)(B) (i). The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from the Court's judgment would not be taken in good faith. it is Further Ordered that the Clerk of Court mail a copy of this judgment to Plaintiff and note service on the docket. So Ordered. (Signed by Judge Vernon S. Broderick on 8/21/2018) (rro) Transmission to Docket Assistant Clerk for processing C35 – C36

JURISDICTION

Case 18-1640, Document 14, 07/17/2018, 2347132,
Page 1 of 1

**UNITED STATES COURT OF APPEALS FOR
THE SECOND CIRCUIT**

MANDATE

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 1st day of June, two thousand and eighteen.

The Church of Jesus Christ of
Latter-Day Saints, S
Xiu Jian Sun, the Spiritual Adam,

Petitioner,

ORDER

v.

Docket No. 18-1640

Jon O. Newman, The Pharisees even
Swallowed Up Camels, Jose A. Cabranes,
The Pharisees Even Swallowed Up Camels,
Catherine O'Hagan Wolfe, The Pharisees Even
Swallowed Up Camels, Robert A. Katzmann,
The Pharisees Even Swallowed Up Camels, Dana
Dowood, The Pharisees Even Swallowed Up Camels,
Respondents.

On December 13, 2017 this Court entered an order in Sun v. Dillon, 16-3557 requiring appellant to file a motion seeking leave of this Court prior to filing any future appeals.

A notice of appeal in the above referenced case was filed. The Court has no record that appellant sought the Court's permission to appeal prior to filing the notice of appeal.

IT IS HEREBY ORDERED that this case is dismissed effective June 22, 2018, unless a motion seeking leave of this Court is filed by that date.

For The Court:
Catherine O'Hagan Wolfe,
Clerk of Court
Catherine O'Hagan Wolfe

A True Copy
Catherine O' Hagan Wolfe Clerk
United States Court of Appeals, Second Circuit
Catherine O'Hagan Wolfe

MANDATE ISSUED ON 07/17/2018

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. Jehovah, the lord god of host sends the messenger through the angel says, '**contempt of Israel judge.**' (藐视以色列法官)
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.**'¹(法利赛的人一个手指头都不动)
3. In the morning of date of December 10, 2016, when the book of Brief of the Appellant made near completion. The lord god of hosts sent the messenger to the spiritual Adam through angel, saying. "**The Pharisees have appropriated widow's possessions.**"² (法利赛人侵吞寡妇的财产)
4. Prior to Pharisees sent letter to ask servant to modify brief: The Lord god of hosts sent messenger speaks to spiritual Adam- plaintiff, through the angel, says: '**Pharisees even swallowed dead people's bones.**'³ (法利赛人连死人的骨头都吐下去)

¹ Civil Docket for Case #: 1:16-cv-01083- ENV-CLP, Court of Appeals Docket #: 16-950;

² Court of Appeals Docket #: 16-3103. No. 17-366.

³ Court of Appeals Docket #: 16-3557. No. 17-1000.

5. The Lord god Jehovah sent the messenger, said to spiritual Adam through the angel, '**unjust judge.**'
6. In the nights from February 29th to March 1st, 2016, the Lord god of host, - Jehovah sent the messenger said to servant, "**seeking for profit, gang organization**"⁴. (谋利, 秘密帮派组织)
7. Jehovah,- the Lord of the host, sent the messenger said to servant: "**Woe unto the Pharisees and the lawyers.**"⁵ (法利赛人和律法师有祸了)

⁴ Civil Docket for Case #: 1:16-cv-01083- ENV-CLP, Court of Appeals Docket #: 16-950; USCAFC No. 16-1783, No. 16-756.

⁵ Civil Docket for Case 1:16-cv-03937-LDH-LB, Court of Appeals Docket #: 16-3103. No. 17-366.

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." (政府长官应该制止罪行, 但绝不可控制良心; 应该惩罚罪恶, 但绝不可压制灵魂的自由)

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
August 31, 2018

The Church of Jesus Christ of Latter-day saints

Servant:

Xiu Jian Sun, the spiritual Adam

54-25 153rd St., 2FL

Flushing, NY 11355

(646) 675-0308

Plaintiff