

19-218

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,

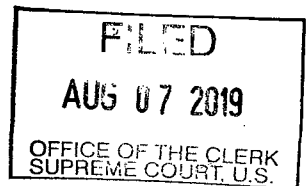
v.

WU HUA JING M.D. & DUSTIN T. NGUYEN M.D.

Lawyers: JONES HIRSCH CONNORS MILLER &  
BULL P. C, MICHAEL P. KELLY, Esq., JAMES P.

CONNORS, Esq., CHARLES T. GURA, Esq.,  
ANGELA M. EVANGELISTA, Esq.

Respondents.



---

**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

54-25 153<sup>rd</sup> St.,

Flushing, NY 11355

646-675-0308

Counsel for Petitioner

---

---

## QUESTION(S) PRESENTED

1. messenger sent by Jehovah,- the Lord of host, said through the angel: **'Bring it over to face the judge.'** (把他帶到法官面前去) Said it on October, 2012, Wu Hua Jing M.D. PHD & Dustin T. Nguyen M.D.
2. 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) 帶到法律面前去)
3. 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."** (谋利, 秘密帮派组织)
4. 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."**
5. 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**;

6. On the date of July 08<sup>th</sup>, 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:**

Wu Hua Jing M.D.,

Dustin T. Nguyen M.D.,

Lawyers: Jones Hirsch Connors Miller & Bull P. C,

Michael P. Kelly, Esq.,

James P. Connors, Esq.,

Charles T. Gura, Esq.,

Angela M. Evangelista, 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

<b>QUESTION(S) PRESENTED .....</b>	<b>i</b>
<b>LIST OF PARTIES.....</b>	<b>iii</b>
<b>Apply for a Mandarin Chinese interpreter.....</b>	<b>iv</b>
<b>JURISDICTION:</b>	
State of New York Court of Appeals (Decided and Entered 06/25/2019) .....	1
<b>CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....</b>	
	2
<b>STATEMENT OF THE CASE .....</b>	<b>4</b>
<b>REASONS FOR GRANTING THE WRIT .....</b>	<b>5</b>
<b>CONCLUSION .....</b>	<b>6</b>

## INDEX TO APPENDICES

### **Appendix A:**

State of New York Court of Appeals (Letter from State of New York Court of Appeals May 10, 2019) .....	A1
--	----

**Appendix B:**

Supreme Court of the State of New York  
Appellate Division: Second Judicial  
Department: (2017-100947 (M-1028)  
Decision & Order) ..... B1

Supreme Court of the State of New York  
Appellate Division: Second Judicial  
Department: January 8, 2019 Notification  
letter of appellate court- . .... B3

**Appendix C:**

Supreme Court of the State of New York  
County of Richmond (100947/2017,  
Decision & Order December 22 2017) ..... C1

**JURISDICTION**

**STATE OF NEW YORK COURT OF APPEALS**

**Decided and Entered on the  
Twenty-fifth day of June, 2019**

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

---

SSD 39

The Church of Jesus Christ of Latter- Day Saints,  
Servant: Xiu Jian Sun, the spiritual Adam  
Appellant,

v.

Wu Hua Jing, &c., et al.,  
Respondents.

---

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 appeal lies as of right from the unanimous order of  
the Appellate Division absent the direct involvement  
of a substantial constitutional question.

John P. Asiello

John P. Asiello  
Clerk of the Court



## 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  
August 4, 2019

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