

20-655

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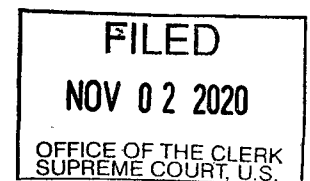
**In The  
Supreme Court of the United States**

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

v.

R. CRAIG LAWRENCE, ASSISTANT UNITED  
STATES ATTORNEY JUDICIARY CENTER  
BUILDING, U.S. ATTORNEY'S OFFICE, JOSHUA  
LYNN ROGERS, ASSISTANT UNITED STATES  
ATTORNEY UNITED STATES ATTORNEY'S  
OFFICE - DISTRICT OF COLUMBIA, FRED  
ELMORE HAYNES, ASSISTANT UNITED STATES  
ATTORNEY, U.S. ATTORNEY'S OFFICE, PATRICIA  
KING. MCBRIDE, ASSISTANT UNITED STATES  
ATTORNEY, U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA, JESSIE K. LIU, UNITED  
STATES ATTORNEY, DANIEL F. VAN HORN,  
Respondents



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**On Petition For Writ Of Certiorari To The United States  
Court Of Appeals For The District Of Columbia Circuit**

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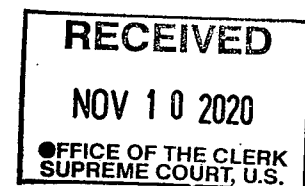
**BRIEF FOR PETITIONER**

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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

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## QUESTION(S) PRESENTED

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

1. The Lord god of hosts Jehovah, sent messenger through the angel answers to the defendants said: **'Livestock.'**
2. The Lord god of hosts Jehovah, sent messenger through the angel answers to the defendants said: **'Secret gang organization.'** 秘密帮派组织
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;

88). And if the governor heed them not, let them importune at the feet of the president;

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.”**

## LIST OF PARTIES

**Petitioner:**

The Church of Jesus Christ of Latter-day saints

Servant: Xiu Jian Sun, the spiritual Adam

**Respondents:**

R. Craig Lawrence, Assistant United States Attorney  
Judiciary Center Building, U.S. Attorney's Office,  
Joshua Lynn Rogers, Assistant United States Attorney  
United States Attorney's Office - District of Columbia,  
Fred Elmore Haynes, Assistant United States  
Attorney, U.S. Attorney's Office, Patricia King.  
McBride, Assistant United States Attorney, U.S.  
Attorney's Office for the District of Columbia, Jessie K.  
Liu, United States Attorney, Daniel F. Van Horn,

**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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Apply for a Mandarin Chinese interpreter .....	iv
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## INDEX TO APPENDICES

### **Appendix A:**

**United States Court of Appeals for District of  
Columbia Circuit: 20-5112**

20-5112 Docket, General Docket ..... A1 – A10

### **Appendix B:**

Clerk's Order [1840427] filed directing party to  
file initial submissions: Appellant docketing  
statement due 05/29/2020. Appellant

certificate as to parties due 05/29/2020. Appellant statement of issues due 05/29/2020. Appellant underlying decision due 05/29/2020. Appellant deferred appendix statement due 05/29/2020. Appellant entry of appearance due 05/29/2020. Appellant transcript status report due 05/29/2020. Appellant procedural motions due 05/29/2020. Appellant dispositive motions due 06/15/2020. Directing party to file initial submissions: Appellee certificate as to parties due 05/29/2020. Appellee entry of appearance due 05/29/2020. Appellee procedural motions due 05/29/2020. Appellee dispositive motions due 06/15/2020. Failure to respond shall result in dismissal of the case for lack of prosecution. The Clerk is directed to mail this order to appellant by certified mail, return receipt requested and by 1st class mail. [20-5112] [Entered: 04/29/2020 11:21 AM] ..... B1 - B3

Entry of Appearance [1844889] filed by John Moustakas on behalf of Appellees Fred E. Haynes, R. Craig Lawrence, Patricia King McBride, Joshua Lynn Rogers, Timothy J. Shea and Daniel F. Van Horn. [20-5112] (Moustakas, John) [Entered: 05/29/2020 01:59 PM] ..... B4

Certificate as to Parties, Rulings and Related Cases [1844891] filed by Fred E. Haynes, R. Craig Lawrence, Patricia King McBride, Joshua Lynn Rogers, Timothy J. Shea and

Daniel F. Van Horn [Service Date:  
05/29/2020] [20-5112] (Moustakas, John)  
[Entered: 05/29/2020 02:00 PM] ..... B5 – B7

Appendix [1845401] filed by Xiu Jian Sun.  
[Volumes: 1] [Service Date: 06/02/2020]  
[20-5112] [Entered: 06/02/2020 03:43 PM] . B8 – B14  
Supplemental Record on Appeal  
transmitted to US Court of Appeals re 8  
Notice of Appeal, 9 Transmission of  
Notice of Appeal and Docket Sheet to  
USCA; Appeal Fees Received, USCA  
Case Number 20-5112. (ztth) (Entered:  
05/01 /2020) ..... B8 – B14

Complaint against Fred Elmore Haynes, R.  
Craig Lawrence, Jessie K. Liu, Patricia  
King McBride, Joshua Lynn Rogers,  
Daniel F. Van Horn (Filing fee \$ 400,  
receipt number 4616100801) with Jury  
Demand filed by Xiu Jian Sun, Church of  
Jesus Christ of Latter-day Saints.  
(Attachment: # 1 Civil Cover Sheet)  
(ztth) (Entered: 09/26/2019) ..... B15 – B18

Motion [1847300] for summary affirmance  
(Response to Motion served by mail due  
on 06/29/2020) filed by Fred E. Haynes,  
R. Craig Lawrence, Patricia King  
McBride, Joshua Lynn Rogers, Timothy  
J. Shea and Daniel F. Van Horn (Service  
Date: 06/15/2020 by US Mail) Length  
Certification: 1,047 words. [20-5112]  
[Edited 06/16/2020 by AH--Modified  
Party Filer] (Moustakas, John) [Entered:  
06/15/2020 06:40 PM] ..... B19 – B30



Amended Motion [1850591] for summary  
affirmance (Response to Motion served by  
mail due on 07/20/2020) filed by Fred E.  
Haynes, R. Craig Lawrence, Patricia King  
McBride, Joshua Lynn Rogers, Timothy J.  
Shea and Daniel F. Van Horn (Service Date:  
07/08/2020 by CM/ECF NDA) Length  
Certification: 1,047 Words. [20-5112]  
(Moustakas, John) [Entered: 07/08/2020 11:  
14 AM] ..... B19 – B30

## 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. 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**"<sup>1</sup>
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<sup>1</sup> not even move his one finger.**'<sup>2</sup>(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.**"<sup>3</sup> (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

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

2 Civil Docket for Case #: 1:17-cv-1861-JDB, Court of Appeals Docket #:18-5313. USCADC No. 18-5313

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

angel, says: '**Pharisees even swallowed dead people's bones.**'<sup>4</sup> (法利赛人连死人的骨头都吐下去)

5. 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**"<sup>5</sup>. (谋利, 秘密帮派组织)
6. Jehovah the Lord god of host sent the messenger through angel spoke in servant's heart: '**snake, belly home's walking.**' (蛇, 肚子家的走路)
7. Jehovah,- the Lord of the host, sent the messenger said to servant: "**Woe unto the Pharisees and the lawyers**"<sup>6</sup>. (法利赛和律法师有祸了)
8. The Lord god Jehovah sent the messenger, said to spiritual Adam through the angel, '**unjust judge.**'
9. 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)

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<sup>4</sup> Court of Appeals Docket #: 16-3557. No. 17-1000.

<sup>5</sup> Civil Docket for Case #: 1:16-cv-01083- ENV-CLP,  
Court of Appeals Docket #: 16-950. USCAFC No. 16-1783, No. 16-756

<sup>6</sup> 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  
October 5, 2020

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  
Plaintiffs