

22-301

No.

---

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

---

FILED

JUL 16 2022

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

ORIGINAL

THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, SERVANT:  
XIU JIAN SUN, THE SPIRITUAL ADAM  
Petitioners,  
v.  
DONALD JOHN TRUMP – CAIN  
Respondent

---

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

---

**BRIEF FOR PETITIONER**

---

The Church of Jesus Christ of Latter-day saints  
Servant: Xiu Jian Sun, the spiritual Adam  
4812 207<sup>th</sup> St.,  
Oakland Gardens, NY 11364  
646-675-0308  
Counsel for Petitioner

---

RECEIVED

SEP 27 2022

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

## 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 the angel spoke from god's temple, said: **"Cain answers to Jehovah, - to kill people is not a crime"**. (该隐回答耶和华神杀人不是罪.)
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 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;
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"**<sup>1</sup>
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."**

---

1 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:**

Donald John Trump - Cain

**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

Questions Presented .....	i
List of Parties .....	iii
Apply for a Mandarin Chinese interpreter .....	iv
Jurisdiction .....	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:

Certificate as to parties, rulings and related cases [1913530] filed by Donald J. Trump [Service Date: 09/09/2021] [21-5174] (Lawrence, R.) .....	A1
Motion [1914509] to extend time to file motion to 12/27/2021 filed by Donald J. Trump (Service Date: 09/16/2021 by US Mail) Length Certification: 284. [21-5174] (Adebonojo, Kenneth) .....	A3

Clerk's Order [1916327] filed granting motion to extend time [1914509-2]; extending Clerk order initial submissions for appellee/respondent [1909760-3] Appellee dispositive motions due 12/27/2021 [21-5174] ..... A5

Motion [1928258] for summary affirmance and to enjoin appellant filed by Donald J. Trump (Service Date: 12/27/2021 by US Mail) Length Certification: 3454 Words. [21-5174]-[Edited 12/28/2021 by AY] (Adebonojo, Kenneth) ..... A6

Clerk's Order [1931525] filed to show cause regarding motion for summary affirmance [1928258-2]. Response to Order due 02/22/2022. The response may not exceed the length limitations established in the order.; The Clerk is directed to mail this order to appellant by certified mail, return receipt requested and by 1st class mail. [21-5174] ..... A22

**JURISDICTION**

USCA Case #21-5174 Document #1948019

Filed: 05/25/2022 Page 1 of 2

**United States Court of Appeals  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

---

**No. 21-5174**

**September Term, 2021**

**1:20-cv-03331-RC**

**Filed On: May 25, 2022**

Xiu Jian Sun, The Spiritual Adam,  
Appellant  
Church of Jesus Christ of Latter-Day Saints,  
Appellee

v.

Donald J. Trump, Former President of U.S.A., Mr.,  
Appellees

**BEFORE:** Rogers, Millett, and Pillard, Circuit Judges

**ORDER**

Upon consideration of appellant's brief and appendix; the motion for summary affirmance and to enjoin appellant from further filings absent leave of court and the opposition thereto; and the order to show cause entered on January 20, 2022, it is

**ORDERED** that the order to show cause be discharged. It is



**FURTHER ORDERED** that the motion for summary affirmance be granted. The merits of the parties' positions are so clear as to warrant summary action. See Taxpayers Watchdog, Inc. v. Stanley, 819 F.2d 294, 297 (D.C. Cir. 1987) (per curiam). The district court did not abuse its discretion in granting appellee's motion to dismiss. The complaint failed to state any colorable claim. See Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009). It is

**FURTHER ORDERED** that appellee's request for an injunction barring appellant from filing any new actions or making further filings in the district court without first obtaining leave of court be remanded to the district court to permit it to address that request in the first instance. It is

**FURTHER ORDERED** that appellee's request for an injunction barring appellant from making further filings in this court without first obtaining leave of court be denied without prejudice.

Pursuant to D.C. Circuit Rule 36, this disposition will not be published. The Clerk is directed to withhold issuance of the mandate herein until seven days after resolution of any timely petition for rehearing or petition for rehearing en banc. See Fed. R. App. P. 41(b); D.C. Cir. Rule 41.

Per Curiam

## 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. 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>1</sup> (法利赛人侵吞寡妇的财产)
2. 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.'**<sup>2</sup> (法利赛人连死人的骨头都吐下去)
3. The Lord god Jehovah sent the messenger, said to spiritual Adam through the angel, **'unjust judge.'**
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)

---

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

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

## 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  
July 11, 2022

The Church of Jesus Christ of Latter-day saints  
Servant: Xiu Jian Sun, the spiritual Adam  
4812 207<sup>th</sup> St.,  
Oakland Gardens, NY 11364  
(646) 675-0308  
Plaintiffs

