

22-41

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
Petitioners,

v.

Lawyers:

MICHAEL P. KELLY, ESQ; JAMES P. CONNORS,
ESQ; CHARLES T. GURAESQ; ANGELA M.
EVANGELISTA, ESQ. MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN

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
4812 207th St.,
Oakland Gardens, NY 11364
646-675-0308

Counsel for Petitioner

FILED
MAY 27 2022

OFFICE OF THE CLERK
SUPREME COURT OF THE STATE OF NEW YORK

ORIGINAL

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)
2. **That the civil magistrate should restrain crime but never control conscience; but punishing 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, 但绝不可以压制灵魂的自由).
3. Jahovah, - the Lord of the host, sent the messenger said to servant: "**Secret gang organization.**" (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 May 6th, 2022, send to Mrs Kathy Hochul, 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:

Lawyers:

Michael P. Kelly, Esq;
James P. Connors, Esq;
Charles T. Guraesq;
Angela M. Evangelista, Esq.
Marshall Dennehey Warner Coleman & Goggin

**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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(Letter from State of New York Court of Appeals August 5, 2019) A4

Appendix B:

Supreme Court of the State of New York
Appellate Division: First Judicial
Department: (2017-301088, Case No.19-
03463) Decision & Order, ENTERED:
December 16, 2021 B1

Appendix C:

Supreme Court of the State of New York
County of Bronx (301088 / 2017,
Decision & Order April 23, 2018) C1

JURISDICTION

STATE OF NEW YORK COURT OF APPEALS

**Decided and Entered on the
twenty-first day of April, 2022**

Present, Hon. Janet DiFiore, Chief Judge, Presiding

SSD 10

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

Appellant,

v.

Michael P. Kelly, &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
the order appealed from does not finally determine the
action within the meaning of the Constitution

Heather Davis
Heather Davis
Deputy 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
May 18, 2022

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