



## APPENDIX A

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 22-8037

In Re: Meghan M. Kelly,  
Respondent

- 1) Letter from Respondent Meghan M. Kelly dated August 18, 2022
- 2) Letter from Respondent dated August 29, 2022

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**ORDER**

Upon receipt of the order of the Supreme Court of Delaware dated August 10, 2022, transferring respondent Meghan Kelly to disability inactive status and by order entered August 17, 2022 Ms. Kelly was transferred to disability inactive status in this Court. The transfer to disability inactive status is automatic and immediate under Rule 16.2 Rules of Attorney Disciplinary Enforcement.

Ms. Kelly has several actions proceeding seeking review of the disability inactive determination by the Supreme Court of Delaware and other related disciplinary proceedings, including actions before this Court. Ms. Kelly has asked action regarding the current disciplinary action be deferred while she exhausts her avenues of review. The request to defer action is denied as unnecessary.

Any further action regarding her disability status will be triggered by Ms. Kelly filing a petition for reinstatement. There is no time deadline for filing a petition for reinstatement. Ms. Kelly is free to file a petition for reinstatement after her related matters have concluded. See R.A.D.E. 16.3, 16.5.

On August 24, 2022, the Clerk's Office received several boxes of voluminous documents from Ms. Kelly. The documents include: copy of four outstanding motions in the Delaware disciplinary proceeding with multiple exhibits; copy of two motions for extension of time filed for good cause, with exhibits, previously filed with the Supreme Court of Delaware; copy of documents for Delaware Matter 22-58 with exhibits; and additional disciplinary related material with exhibits.

As previously stated, the current action remains in stasis pending Mr. Kelly's application for reinstatement. Ms. Kelly is directed not to file additional documents for the disciplinary action in the Court until she is ready to file her motion for reinstatement. The documents which were received on August 24, 2022 were received in hard copy and it will take substantial staff time to convert these documents to electronic format. As they have been received, they will be converted and uploaded but it will take substantial time to complete the task. If additional documents are received **prior** to the filing of a petition for reinstatement, the documents will not be acknowledged or uploaded, no action will be taken on them, and they may be returned to Ms. Kelly.

For the Court,

s/ Patricia S. Dodszuweit  
Clerk

Dated: August 30, 2022

DWB/arr/cc: Meghan M. Kelly

## APPENDIX B

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Misc. No. 22-8037

In Re: Meghan M. Kelly, Esquire  
(Supreme Court of Delaware No. 58,2022)

**ORDER**

The Clerk received a copy of an order of the Supreme Court of Delaware, dated August 10, 2022, immediately transferring Meghan M. Kelly, Esquire, to disability inactive status until such time that she demonstrates that any disabilities have been removed.

Pursuant to Rule 16.2 of the Rules of Attorney Disciplinary Enforcement, it is ORDERED that Meghan M. Kelly, Esquire, is transferred to disability inactive status in this Court.

Nothing further is needed from Ms. Kelly to remain on disability inactive status in this Court. When she believes she should be reinstated, or if she desires to contest this transfer, formal reinstatement proceedings can be instituted. See R.A.D.E. 16.3, 16.5.

For the Court,

s/ Patricia S. Dodszuweit  
Clerk

Dated: August 17, 2022



A True Copy:

*Patricia S. Dodszuweit*

Patricia S. Dodszuweit, Clerk

## APPENDIX C

**General Docket  
Third Circuit Court of Appeals**

**Court of Appeals Docket #: 22-8037****In Re: Meghan M. Kelly****Appeal From: null****Fee Status: NA****Docketed: 08/17/2022****Termed: 08/17/2022****Case Type Information:**

- 1) Attorney Discipline
- 2) Federal
- 3) null

**Originating Court Information:**

None

**Prior Cases:**

None

**Current Cases:**

None

**In re: MEGHAN M. KELLY**

Respondent - Respondent

Meghan M. Kelly, Esq.

Direct: 302-493-6693

Email: meghankellyesq@yahoo.com

[NTC Pro Se Atty]

34012 Shawnee Drive

Dagsboro, DE 19939

In re: MEGHAN M. KELLY,

Respondent



- 08/17/2022 ☐ 1  
25 pg, 283.8 KB  
ATTORNEY DISCIPLINE CASE DOCKETED. Reciprocal Proceeding initiated against Respondent Meghan M. Kelly by Order of Supreme Court of Delaware dated August 10, 2022, placed counsel on disability inactive status effective immediately. (DW) [Entered: 08/17/2022 02:20 PM]
- 08/17/2022 ☐ 2  
2 pg, 165.25 KB  
ORDER (Clerk) The Clerk received a copy of an order of the Supreme Court of Delaware, dated August 10, 2022, immediately transferring Meghan M. Kelly, Esquire, to disability inactive status until such time that she demonstrates that any disabilities have been removed. Pursuant to Rule 16.2 of the Rules of Attorney Disciplinary Enforcement, it is ORDERED that Meghan M. Kelly, Esquire, is transferred to disability inactive status in this Court. Nothing further is needed from Ms. Kelly to remain on disability inactive status in this Court. When she believes she should be reinstated, or if she desires to contest this transfer, formal reinstatement proceedings can be instituted. See R.A.D.E. 16.3, 16.5. (DW) [Entered: 08/17/2022 06:48 PM]
- 08/17/2022 ☐ 3  
Certified Copies of Order Clerk's order dated August 17, 2022, transferring Meghan M. Kelly to disability inactive status sent to Supreme Court of Delaware, Respondent Meghan M. Kelly and ABA National Lawyer Data Bank. (DW) [Entered: 08/17/2022 08:04 PM]
- 08/19/2022 ☐ 4  
10 pg, 754.38 KB  
LETTER received from Respondent Meghan M. Kelly requesting to be excused from reporting to this Court any disciplinary orders from other jurisdictions. Service made on 08/19/2022 by ECF. (DW) [Entered: 08/19/2022 04:39 PM]
- 08/19/2022 ☐ 5  
TEXT ONLY ORDER (Clerk) No action will be taken on the Meghan Kelly's letter request for a waiver of R.A.D.E. 5.1's notification obligation. The Court has already received notice of the Delaware disability-inactive order and transferred Ms. Kelly to the same bar status in this Court. Except for the possibility of petitioning for reinstatement, these proceedings have concluded." (DW) [Entered: 08/19/2022 04:41 PM]
- 08/22/2022 ☐ 6  
4 pg, 353.17 KB  
LETTER from Respondent Meghan M. Kelly. Service made on 08/18/2022 by US mail. (ARR) [Entered: 08/22/2022 04:11 PM]
- 08/24/2022 ☐ 9  
2661 pg, 107.79 MB  
DOCUMENTS filed by Respondent Meghan M. Kelly containing a copy of four outstanding motions pending in the Supreme Court of Delaware disciplinary proceeding with multiple exhibits; copy of two motions for extension of time filed for good cause, with exhibits previously filed with the Supreme Court of Delaware; copy of documents for Delaware Matter 22-58 with exhibits ; and additional disciplinary related material with exhibits. (DW) [Entered: 09/08/2022 12:24 PM]
- 08/29/2022 ☐ 7  
252 pg, 58.03 MB  
ECF FILER: LETTER on behalf of Respondent Meghan M. Kelly. Respondent Meghan M. Kelly will adopt the My case manager has been out for a week and a half, to return Aug 31. Documents were timely sent to be uploaded, but were not filed and misfiled. I need additional time to file a for cause motion, and in light of 6 reciprocal proceedings. Thank you on behalf of Respondent Meghan M. Kelly. Certificate of Service dated 08/29/2022. Service made by ECF. This document will be SENT TO THE MERITS PANEL if/when applicable. [22-8037] (MMK) [Entered: 08/29/2022 03:15 PM]
- 08/30/2022 ☐ 8  
2 pg, 68.45 KB  
ORDER (Clerk) Upon receipt of the order of the Supreme Court of Delaware dated August 10, 2022, transferring respondent Meghan Kelly to disability inactive status and by order entered August 17, 2022 Ms. Kelly was transferred to disability inactive status in this Court. The transfer to disability inactive status is automatic and immediate under Rule 16.2 Rules of Attorney Disciplinary Enforcement. Ms. Kelly has several actions proceeding seeking review of the disability inactive determination by the Supreme Court of Delaware and other related disciplinary proceedings, including actions before this Court. Ms. Kelly has asked action regarding the current disciplinary action be deferred while she exhausts her avenues of review. The request to defer action is denied as unnecessary. Any further action regarding her disability status will be triggered by Ms. Kelly filing a petition for reinstatement. There is no time deadline for filing a petition for reinstatement. Ms. Kelly is free to file a petition for reinstatement after her related matters have concluded. See R.A.D.E. 16.3, 16.5. On August 24, 2022, the Clerk's Office received several boxes of voluminous documents from Ms. Kelly. The documents include: copy of four outstanding motions in the Delaware disciplinary proceeding with multiple exhibits; copy of two motions for extension of time filed for good cause, with exhibits, previously filed with the Supreme Court of Delaware; copy of documents for Delaware Matter 22-58 with exhibits; and additional disciplinary related material with exhibits. As previously stated, the current action remains in stasis pending Mr. Kelly's application for reinstatement. Ms. Kelly is directed not to file additional documents for the disciplinary action in the Court until she is ready to file her motion for reinstatement. The documents which were received on August 24, 2022 were received in hard copy and it will take substantial staff time to convert these documents to electronic format. As they have been received, they will be converted and uploaded but it will take substantial time to complete the task. If additional documents are received prior to the filing of a petition for reinstatement, the documents will not be acknowledged or uploaded, no action will be taken on them, and they may be returned to Ms. Kelly. (ARR) [Entered: 08/30/2022 05:20 PM]
- 09/08/2022 ☐ 10  
30 pg, 2.28 MB  
RETURNED MAIL. U.S. Postal Service returned the Clerk's order dated August 17, 2022 , transferring Respondent to disability inactive status [8] sent to Respondent Meghan M. Kelly via certified mail. Mail was returned to sender, unclaimed. It is noted that the Clerk's order was also sent electronically via Respondent's email address. (DW) [Entered: 09/12/2022 11:54 AM]

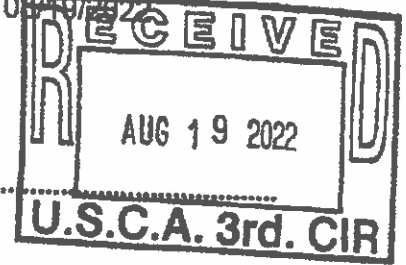
09/29/2022 ☐ 11  
2 pg. 151 KB

Copy of Notice of Order by the Supreme Court of Pennsylvania dated September 21, 2022, requesting any grounds against the transfer to disability inactive status. (DW) [Entered: 09/30/2022 10:46 AM]

12/05/2022 ☐ 12

U.S. Supreme Court Letter dated 12/01/2022 granting Respondent Meghan M. Kelly an extension of time to and including 01/27/2023 to file petition for writ of certiorari. Supreme Court Application No. 22A478. (CRG) [Entered: 12/06/2022 02:34 PM]

## APPENDIX D



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of Court

United States Court of Appeals for the Third Circuit

21400 U.S. Courthouse

601 Market Street

Philadelphia, PA 19106-1790

RE: PA Bar No. 202268

August 16, 2022

Dear Honorable Clerk of Court :

While seeking leave to respond and assert my rights against government accusation, I invoke my 5<sup>th</sup> Amendment right against self-incrimination.

I am licensed to practice law before this Court. I seek excusal, for good cause, from reporting to this Court, disciplinary orders from other jurisdictions. Requiring I report to this Court by written rule, requires I provide evidence to the state in order that they may prosecute me relating to my license to practice law in violation of my 5<sup>th</sup> Amendment right against self-incrimination.

In *In re Gi Yeong Nam*, 245 B.R. 216 (Bankr. E.D. Pa. 2000), the Court held:

"Once a witness voluntarily reveals an incriminating fact, Fifth Amendment privilege against self-incrimination cannot be invoked to avoid disclosing the details of that fact unless the witness' answer to the particular question posed would subject him or her to a "real danger" of further incrimination."  
U.S.C.A. Const. Amend. 5.

In my case, volunteering information by reporting orders against my license subjects me to automatic government prosecution. The fact I appeal orders on public record before appellate courts, does not remove the “real danger of further [government prosecution] in proceedings likened to be both criminal and civil in nature.” *Id.*

Should I notify state courts of an order incriminating me, the Clerk customarily gives the self-incriminating notice to the Office of Disciplinary Counsel who automatically prosecutes.

In federal courts, the procedures are different. It appears the self-incriminating reporting letter is given to a federal judge or a panel of federal judges who prosecute the attorney by reciprocal deactivation of license, while allowing attorneys to show for good cause why such automatic taking of property interest must not occur.

The Court is the prosecutor, the judge and witness too, without a case or controversy requirement. In federal reciprocity cases, I would not serve an opposing counsel in the US Supreme Court or any other federal court, should reciprocal discipline be conducted. I would be defending myself against required Court prosecution should I not bear the burden of clear and convincing evidence as to why the Court must not prosecute me.

The Government must not compel me to provide testimony against my person at the threat of certain prosecution for the exercise of my religious-political beliefs, religious-political speech, religious exercise, religious-political association, poverty, or religious-political petitions.

Should a waiver of the requirement I report disciplinary action to this Court be denied, for good cause, I seek leave for additional time in the amount of 30 days I receive notice from this Court of denial of my asserted right to invoke the 5<sup>th</sup> Amendment to file notice of disciplinary orders against me in this Court. By receipt of notice, for good cause, I request the Court allow 30 days the order is received by me, not the date the order is issued. Since mail has been lost, it is important to reserve my rights to assert them, rather than to defend my rights against prosecution.

Asserting rights offers more protections than defending them against certain prosecution.

I invoke my rights under the 5<sup>th</sup> Amendment, and argue self-regulation violates case and controversy requirements, making the profession, business, the appearance and marketing of professionals, not justice, the goal of the courts.

This Court's rule requiring licensed attorneys to report disciplinary actions against their person in other jurisdictions, is the rule in all federal and state courts. I argue this rule is unconstitutional. Under the compelled government threat of

punishment for failing to report, licensed attorneys must self-incriminate, in violation of US Amend. V. I argue this is unconstitutional for all attorneys, and seek a waiver for myself.

No good can come to my person by reporting incriminating evidence against my license, and the threat of being declared mentally disabled, but for my belief in Jesus Christ, exercise of fundamental rights, or poverty. Due to lack of resources, working computers, printers, paper and other luxuries, I had typos and run on sentences in some of my pleadings. I did not have the luxury of time or resources to proof read or correct documents. I typed desperately wherever I could use computers or print documents, including at libraries, with limited time at the computer. I was required to file timely or waive my rights. I do not regret imperfectly standing up for my religious belief from government persecution solely for the exercise of my religious belief and fundamental rights. I would regret doing nothing at a time such as now.

Practicing law is my religious exercise. I believe justice in the Courts is a command by God, saving people in this life and eternity.<sup>1</sup>

I fear the government may put me away for my faith in Jesus, deeming it a mental disability. Please do not compel me under the threat of punishment for

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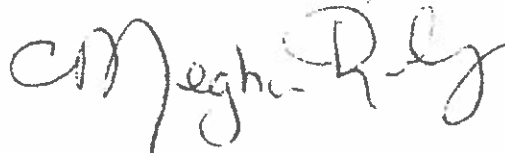
<sup>1</sup> Citing Bible, *Amos* 5:15 ("maintain justice in the courts."); (*Matthew* 23:23, "Woe to you, teachers of the law and Pharisees, you hypocrites! You give a tenth of your spices—mint, dill and cumin. But you have neglected the more important matters of the law—justice, mercy and faithfulness. You should have practiced the latter, without neglecting the former.")

failing to report to possible imprisonment or economic, social and physical persecution of the government for the exercise of my fundamental rights.

Thank you for your kind consideration.

Respectfully Submitted,

Aug 16, 2022



/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

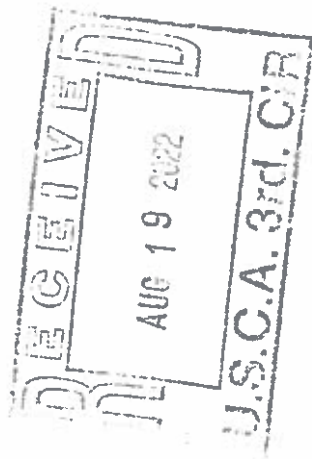
meghankellyesq@yahoo.com

302-493-6693

Ref: PA 202268



54612 Shaw and P.  
Dougherty, DE 14635



WILMINGTON, DE 197  
27 AUG 2022 PM 17



Clerk of Court, Third Circuit Court of Appeals  
21400 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106-1790

## APPENDIX E

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Nos. 21-3198 & 22-2079

Kelly v. Swartz

To: Clerk

- 1) Appellant's Letter Regarding the Order of the Supreme Court of Delaware Transferring Her to Disability Inactive Status
  - 2) Appellant's Letter Regarding Last Paragraph of Earlier Letter
- 

The appellant electronically filed the foregoing letters on the dockets of these appeals. They will remain on these dockets for whatever consideration the Court deems appropriate.

Any proceedings that may be opened regarding the appellant's bar status in this Court would, however, be conducted separately from these appeals and under a different docket number.

For the Court,

s/ Patricia S. Dodszuweit  
Clerk

Dated: August 17, 2022

kr/pdb/cc: Meghan M. Kelly, Esq.  
Zi-Xiang Shen , Esq.

## APPENDIX F

**Office of Disciplinary Counsel**  
SUPREME COURT OF THE STATE OF DELAWARE

The Renaissance Centre  
405 N. King Street, Suite 420  
Wilmington, DE 19801  
(302) 651-3931  
(302) 651-3939 (FAX)  
<https://courts.delaware.gov/odc>

DAVID A. WHITE  
Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ  
Disciplinary Counsel

KATHLEEN M. VAVALA  
Disciplinary Counsel

August 23, 2021

**CONFIDENTIAL**  
**VIA EMAIL & U.S. MAIL**

[MeghanKellyEsq@valaya.com](mailto:MeghanKellyEsq@valaya.com)

Meghan M. Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939

**RE: ODC File No. 115327-B (Meghan M. Kelly, Esquire)**

Dear Ms. Kelly:

This Office has reviewed several pleadings you have filed in the Court of Chancery and the Supreme Court in connection with the lawsuit *Meghan Kelly v. Donald Trump*. The content of these documents raise serious concerns as to your mental capacity and fitness to practice law.

Under Rule 9(a) of the Delaware Lawyers' Rules of Disciplinary Procedure, the ODC "shall screen and evaluate all information coming to its attention by complaint or otherwise concerning possible misconduct by or incapacity of a lawyer." Procedural Rule 19 (c) provides "Information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law shall be investigated by the ODC. If there are reasonable grounds to believe the interests of respondent's clients or the public are endangered, such information shall be the subject of formal proceedings to determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent's expense. If, after reviewing the recommendation of the Board and upon due consideration of the matter, the Court concludes that the respondent is incapacitated from continuing to practice law, it shall enter an order transferring the respondent to disability inactive status for an indefinite period and until further order of the Court."

Are Christians unfit to  
practice law  
I am a follower  
of Jesus  
Christ

# APPENDIX G

6. In September 2020, Respondent filed a lawsuit in the Court of Chancery of Delaware against former-President Donald Trump: *Meghan Kelly v. Donald Trump*, Case No. 2020-0809 (September 21, 2020). The Court of Chancery dismissed Respondent's complaint. Respondent appealed to the Supreme Court of Delaware, which affirmed the Court of Chancery. On August 23, 2021, Respondent filed a writ of certiorari with the Supreme Court of the United States.

7. The factual averments, argument, and other content in Respondent's filings in the Delaware courts, raise serious concerns regarding her mental capacity to practice law. Respondent's statements and arguments: lack focus and clarity; are objectively illogical; and rely on non-legal sources, including the Bible, instead of appropriate legal authority. The following excerpts demonstrate, by way of example only, Respondent's apparent inability to make cogent, rational legal arguments:

13. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the belief, supporting the President's perceived thinking or conduct or his candidacy, despite all of his sinful misbehavior and in a way supporting his sins, as excusable without confession or without repentance, is supporting God, when I believe sinfully doing your own will leads to damnation. (Mark 8:34, "Whoever desires to come after Me, let him deny himself (meaning not doing their own will, their own selfish, sinful desires, but exercise self-discipline, using their mind, their brain, which is their free will to do God's will, love), and take up his cross, and follow Me (by love in truth, not lusts in deception)."); Also see, (Matthew 16:24, Luke 9:23 regarding the same message of personal sacrifice to follow Jesus).

My religious beliefs are the source of the reason why this petition was brought

## APPENDIX H



## THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the ) Supreme Ct. No. 58, 2022  
Supreme Court of the state of Delaware ) Misc. 541,  
Meghan M. Kelly, respondent. ) Board Case No. 115327-B

Respondent's reply to ODC's Corrected Response to Respondent's Objections to the Report and Recommendation of the Board on Professional Responsibility

Respondent, Meghan Kelly, pro se this June 7, 2022, files this reply, contemporaneously, with *Respondent's Meghan Kelly's Motion to exceed the word limit in my Reply to ODC's Corrected Response to Respondent's Objections to the Report and Recommendation of the Board on Professional Responsibility*, incorporated herein in its entirety by this reference, and *Respondent's Meghan Kelly's Motion to be excused from the notary and affirming requirements in Delaware Court pleadings*, incorporated herein in its entirety by this reference.

### **I      Introductory Arguments**

The ODC's factual characterizations, legal arguments by Kathleen Vavala ("KV" or "Kathleen"), and the Office of Disciplinary Counsel ("ODC") asserted below, and in the *ODC's Corrected Response to Respondent's Objections to the Report and Recommendation* ("KV") of the Board on Professional Responsibility ("Board"), and the Board's findings, in this fixed, unfair partial proceeding brought in conspiracy by the Delaware Supreme Court, Chancery Court agents, ODC and Board, (collectively, and individually "State") to conceal Court agents'

unconstitutional interference with the “due process” adjudication of *Kelly v Trump*, and thereby in interference with my personal-religious-political-speech; personal-religious-beliefs; personal-religious-political-exercise; and personal-religious-political-petitions has punished me and violated by constitutional protections by selective disparate treatment against me, for the exercise of fundamental rights, as a party of one, as an indigent individual with religious-political beliefs in God as savior and the state as civil authority curbed by the first amendment from “establishing religion.”

The State’s findings must be rejected as a matter of law as an abuse of discretion, clearly erroneous findings of fact, an errant conclusion of law, and an improper application of law to facts.

The hearings and actions taken against my professional license in retaliation for my exercise of Constitutional rights are in violation of the First Amendment, the Procedural and Substantive Due Process Clause and Equal Protection Clauses of the Fourteenth Amendment. They must be rejected as by “rule of law” rather than personal vendetta for my personal-religious-political speech contained in the petitions. (US Amend I, XIV)

The State denied me of substantive and procedural due process rights in this disciplinary proceeding.<sup>1</sup> The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, in retaliation against me for filing *Kelly v Trump* and for petitioning the court regarding bar dues to safeguard my liberties.<sup>2</sup>

The state abused its discretion by 1. Vindictive prosecution, which constitutes a violation of due process, and by Selective prosecution, which constitutes a denial of equal protection.

I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion by President Trump.

I uphold my oath by requesting government agents, judges, presidents and members of congress to adhere to rule of law by allowing me to exercise my Constitutional rights. The steps taken to orchestrate this proceeding circumvent due process protections and, thereby, manifest selective; targeted; unjust persecution.

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<sup>1</sup> Objxn

<sup>2</sup> Id.

I include, restate and incorporate by this reference my Objections to the Report, the exhibits referred therein, and the Memorandum of Law (“MOL,” at DI 31), and all arguments and points made in each and every one of these documents, filed on May 21, 2021, are restated in this reply. DI. 26-50 (“Objxn” and “-” or “-Ex-” for specific exhibits therein).

I incorporate herein in its entirety, by this reference *Respondent’s Motion for a free copy of the record of the Board and Before the Delaware Supreme Court* [(hereinafter also referred to as, “Court”)], *which is required for Appeal*, filed on May 10, 2022. D.I. 55-56.

I incorporate herein in its entirety by this reference *Respondent’s Motion for an extension of Time under Rule 15(b)(i) and (iii)*, filed on May 16, 2022. DI 62-72.

**II. Background: The Court made insidious attacks, through its arms and agents in retaliation for my exercise of fundamental rights in petitioning the Court in *Kelly v Trump*, to interfere with, and affect the outcome, and sought to conceal such attacks by eliminating witnesses participating in the attacks, eliminating pleadings, and eliminating me by defaming my character, as not credible, disabled.**

The State brought this petition against me to conceal state misconduct, and to retaliate against me for the exercise of Constitutionally protected activity based on disdain towards me for my religious-political-beliefs, poverty, and to conceal Court agents' misconduct.<sup>3</sup>

I filed a RFRA lawsuit against President Trump seeking to dissolve the establishment of government-religion to alleviate a substantial burden upon my free exercise of religious beliefs, without government incited persecution as a Christian, Catholic, Democrat, living in Trump territory, in Sussex County, Delaware.<sup>4</sup>

I do not believe my former law firm would have hired me back if I sued the popular president. So, I put off seeking to rejoin my former real estate settlement law firm, in order to safeguard my free exercise of religious beliefs without government incited private economic, social or physical persecution.<sup>5</sup>

Since, I was not working for pay, I petitioned the Delaware Supreme Court for relief from attorney dues for all lawyers facing economic hardship or unemployed during the global pandemic.<sup>6</sup> My request was not granted. Id.

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<sup>3</sup> (ObjxA-H-2, N, including internal exhibits, P, including internal exhibits, K-including internal exhibits, DI 62-72); MOL.

<sup>4</sup> . (Objxn-A, DI 62-72, Ex-C)

<sup>5</sup> (DI 62-72, Internal-Exhibit C, which includes pleadings in Kelly v Trump, Objxn-E)

<sup>6</sup> (Objxn-E-F, K-internal exhibits 20-24)



interference with my law suit. Id. (Exhibit A, B, C) The Clerk of Court confirmed the entire court reviewed my petitions relating to attorney dues, evidencing the entire Court incited the interference in *Kelly v Trump*.

Further, Sussex Court of Common Pleas Judge Kenneth S. Clark, interrogated me at the arms of the court's request in public at BJ's, located in Millsboro. He demanded I come to his chambers for filing *Kelly v Trump* to obstruct, impede or cause me to forgo my lawsuit. Id.

Other parties are not threatened by Court agents wearing the cloak of government authority to obstruct, impede or cause claimants to forgo cases whose religious-political beliefs they disagree with. Minorities like myself, whose religious-political beliefs do not conform to the mainstream are still afforded Constitutional protections for exercise of fundamental rights relating to their diverse, tightly held religious-political beliefs, including speech defending such rights in petitions.<sup>9</sup>

I petitioned the Delaware Supreme Court concerning the disparate treatment. The Delaware supreme Court ruled my case was frivolous, and indicated my petitions relating to disparate treatment need not be addressed.

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<sup>9</sup> *Obergefell v. Hodges*, 576 U.S. 644

The Court's disagreement with my religious beliefs is an impermissible reason to deem me disabled. "Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case, [including mine] are reasonable." *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. The government may not determine what is and what is not an acceptable religious belief.<sup>10</sup> My God is the arbiter of my life, regarding religious beliefs, not the government, even when the government deems my religious beliefs wrong or a disability.

The Courts misguided conclusion that my case is frivolous is not a permissible reason to deem me disabled. Other lawyers have their cases and their clients' cases kicked out as frivolous and they are not disciplined or deemed a danger to society. My religious-political beliefs is the ODC's admitted reason for their claim for disability and for disciplining me. (Exhibits E, F)

On August 23, 2021, the ODC sent me a threatening letter by email, interfering with my active case, but for my petitions, before I appealed the Delaware Supreme Court's decision to the United States Supreme Court, admitting my Delaware Supreme Court and Chancery Court religious-political pleadings, as

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<sup>10</sup> *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion.")



the reason for their attack.<sup>11</sup> **(Exhibit E)**. The ODC's attack was "unconstitutional on its face and as applied." *Hill v. City of Scranton*, 411 F.3d 118, 122 (3d Cir. 2005). Should they have any legitimate concerns, which the record shows none, the ODC should not have interfered with my First Amendment exercise of petitioning the courts, to affect the outcome or pressure me to forgo the case, in violation of US Amend I and XIV. *Id.* at 125-126.

On October 25, 2021, I filed a lawsuit to enjoin the ODC for retaliating against me for exercising fundamental rights, and for damages for emotional relief.<sup>12</sup> On November 1, 2021 the US Supreme Court denied my writ of certiorari.<sup>13</sup>

On November 4, 2021, Delaware Supreme Court sealed my Delaware Supreme Court petitions in *Kelly v Trump* relating to disparate treatment, without notice and an opportunity for me, a party to be heard, and without valid cause. <sup>14</sup>

I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State. <sup>15</sup> Third Circuit Judge Bright's, concurring in part and dissenting in part

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<sup>11</sup> Objxn-K-Internal-Ex-5-7.

<sup>12</sup> Objxn-H

<sup>13</sup> Objn-K-Ex-1.

<sup>14</sup> (DI 62-72)

<sup>15</sup> (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right

in *U.S. v. Wecht*, 484 F.3d 194, 221, 226 (3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

In my case the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state.

"When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure." *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); See *United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, DI 16, 21, 40, 41, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive

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of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Constitution. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs.*, 800 F.2d 339, 343 (3d Cir. 1986).

due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

Nothing was normal in *Kelly v Trump*. The State and ODC attacked and retaliated against me for my religious-political speech contained in my petitions, reflecting my religious-political beliefs.<sup>16</sup> The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point.

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This is not the first time, the State through its arm has retaliated against me for its own lawless lusts, convenience, at the exchange of sacrificing Constitutional liberties, including the right to petition. Objxn-D, H, at paragraphs 277-299. I lost more than two million dollars in expected income, but for, the retaliation by the arms of the Court, for petitioning the State through its arms or the Court regarding concerns while taking the Delaware Bar. Id.

**III. The Board and Court's violations of substantive and Procedural Due Process in Disciplinary Matter eliminate subject matter jurisdiction and make their judgments void as a matter of law**

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<sup>16</sup> . Objxn-Ex B-H2, K

<sup>17</sup> MOL Objxn-Ex-H, Objxn-Ex-N-internal-exhibits 1, 2to Exhibit 6, 3 to exhibit 6, 4 to exhibit 6, 5 to exhibit 6, 6 to exhibit 6, 8 to exhibit 6, Exhibit 7-9.

Nothing was normal in my disciplinary case either. I was not treated like other lawyers or other plaintiffs. I was disparately treated based on my poverty, and personal-religious-political beliefs, as a party of one, and was selectively punished for exercise of Constitutional liberties. <sup>18</sup>

The State in bad faith prevented and obstructed discovery, to conceal witnesses were removed from the Chancery Court to impede their testimony from aiding in my defense, and to conceal relevant records were sealed by the Court to favor the ODC.<sup>19</sup> The United States Supreme Court held, "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment." *Moran v. Burbine*, 475 U.S. 412, 466 (1986). Concealing the fact two witnesses were removed from the Chancery Court to prevent their favorable testimony in my defense, and government concealing of petitions favorable to my defense, violates my Due Process rights to a fair proceeding, by bias towards the State.

The Board's findings of fact are not supported by substantial evidence and should not be adopted. The record shows substantial evidence the Board was objectively biased towards the ODC, not fair, and prejudiced against me. The

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<sup>18</sup> Objxn-K- 8-9, FF, GG, D.I. 55-56.

<sup>19</sup> *Brady v. Maryland*, 373 U.S. 83, 87 (1963); *United States v. Bagley*, 473 U.S. 667 (1985); *United States v. Agurs*, 427 U.S. 97 (1976); *Moore v. Illinois*, 408 U.S. 786 (1972)." *Moran v. Burbine*, 475 U.S. 412, 467 n.59 (1986)

Board denied me of basic Equal protection, procedural and substantive due process rights afforded to similarly situated respondents based on disdain for my religious-political-exercise of fundamental rights and poverty. US Amend I and XIV. I was denied an opportunity to be heard, to prepare and present my case, denied adequate time to perform discovery, denied adequate notice which I at no time waived.<sup>20</sup>

The Board gave me 18 days, when the DLRDP Rule 9(d)(3) required, they provide me with notice “at least 20 days in advance of the hearing date,” which prejudiced me. *Id.* The Board denied me of an opportunity to subpoena and cross examine witnesses with first-hand knowledge, to conceal the fact the State eliminated two potential witnesses from the court. *Id.*

The state rushed the proceeding and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters. *Id.*

I at no time sat on my rights, but fought for my life and liberty to worship God through the practice of law, and as a citizen without government persecution but for my exercise of fundamental rights. *Id.*

The state denied my 1st and 6th Amendment rights, applicable to the state via the 14th Amendment, to represent myself at the inception, causing me to file

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<sup>20</sup> Objxn, Ex-M-P-Q-R-R-1-S-T-U-U2-V-W-X-AA-BB-CC-DD-EE-FF-GG-HH, DI 55-56

pleadings.<sup>21</sup> The Board ignored, and did not address my motions objecting to insufficient notice, by its failure to provide at least 20 days-notice of the hearing, as required by the rules of Disciplinary procedure, Rule 9, which prejudiced my case, motivated by their animosity towards my religious-political beliefs and exercise. Objxn-Ex-M,N, W. I filed objections to the appointment of Counsel, moved for opportunity to perform discovery and postpone the hearing until fair reasonable due process was granted in a motion dated, December 18, 2022. That was ignored. Objxn-Ex-N-M-N-O-P. On December 29, 2021, I filed a letter with the Court requesting relief since the hearing was two weeks away, and I had not even been granted 6th Amendment permission to represent myself to perform discovery or prepare, at the time. Objxn-Ex-P.

It was not until December 30, 2022, the Court granted me the right to self-represent, less than 13 full days before the hearing, with no opportunity to prepare my defense of religious-political petitions, speech, association, beliefs against state persecution, but for my belief in Jesus. Ex-P-2.

I was so physically and emotionally exhausted that I fell ill with the shingles. After the reprieve, the small battle of self-representation won, I noticed

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<sup>21</sup> Obxn-Ex-N. Mark 13:11 “Whenever you are arrested and brought to trial, do not prepare beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

my rash, pain, lethargy and weakness. Yet, I filed a motion the next day, that was ignored by the Board dated December 31, 2021, to prevent medical and mental examinations, dated December 31, 2021, Ex-Q, and another one dated on or about January 31, 2022, incorporated herein, Ex-X. Physical and mental examinations are against my religious beliefs, and the Court must not maliciously violate my religious beliefs in bad faith.

I followed up with the Board numerous times on the status of my motion to perform discovery, objection to insufficient notice, and postpone the hearing so as not to prejudice me, and at no time sat on my rights. Ex-K-L-M-N-O-P-Q-R-R-1,R-2-S-T-U-U2-V-W-X. I filed additional motions to postpone the hearing so as not to deny me a fair reasonable opportunity to prepare and present my case, perform discovery, cross examine witnesses. Id. I was denied basic due process rights, and substantive due process rights, based on my religious-political exercise of fundamental rights, in violation of the First and Fourteenth Amendment, motivated by the state's disdain towards my personal religious-political beliefs, exercise, speech and petitions demonstrating my faith in Jesus. Id.

I appealed to the Delaware Supreme Court and was denied procedural and substantive due process rights, based on the fact the Court appeared to render a verdict before granting me an opportunity to be heard, motivated by disdain to discriminate me based on my religious beliefs by disparate treatment, unusual to

those of other claimants before the court. Ex-R, Ex-R-1, Ex-S, Ex-T, Ex-U, Ex-U-2, Ex-V.

The State ignored and denied me an opportunity to be heard on various motions and appeals, including but not limited to pleadings dated December 18, 2021, December 31, 2022, January 13, 2022, January 15, 2022, objecting to due process violations, moving to postpone the hearing, to call witnesses, and objecting to the insufficient notice sent out notice 18 days prior to the scheduled hearing. Ex-P-Q-R-R-2-S-T-U-U-2-V-W. I had no time to subpoena witnesses, or even to discover the fact the state eliminated witnesses through terminating their employment in the Chancery Court, and I moved the Board and the Court to grant me time, specifically mentioning Arline Simmons as witness. I at no time waived my insufficient notice argument.

Kathleen, did not participate in the proceeding until after the hearing took place. Her recital of the DRPC rules to mislead the court is in vain. I was not afforded the protections of the rules, and at no times waived my Constitutional rights to a fair proceeding. The voluminous exhibits the Board ignored, deeming them as irrelevant, are relevant to show in fact the Board denied me an opportunity to be heard on the assertions and pleas contained therein, in defense of my exercise of fundamental rights. The exhibits show I did not sit on my rights or waive them.



Contrary to Kathleen's assertion, having only been granted the right to represent myself 13 days before the hearing date, I was not afforded with ample time to provide a list of witnesses to call 10 days in advance of the hearing, as required under DLRDC (12)(h) as I faced other complications including but not limited to the lack of a phone, computer malfunctioning, the shingles, and vulture attacks. See D.I. 55-56. I did not even discover Arline Simmons, a witness I motioned to call, could not be served at the Chancery Court until after the hearing. Objxn-Ex-U. I had insufficient time to effectuate discovery, as I fought to represent myself so as not to violate my religious beliefs. The Board ignored and indirectly denied my requests for time for an opportunity, while rendering an informal, unappealable order in email form. Obxn-M-U2.

The hearing was postponed for 8 days, for a reason I did not assert, my illness, which did not afford me enough time to prepare, research, perform discovery, fully recover, or to subpoena witnesses to notice opposing counsel 10 days in advance. DLRDP (12)(h). Objxn-Ex-R-1. The Board ignored and rendered no orders on other motions, and rendered an E-mail determination, to obstruct formal appeal on January 18, 2022, in the fixed proceeding against me. Objxn-Ex-U-2.

I attempted to require the Board cancel the hearing, in advance, to prevent incurring costs as I was still not feeling well. I was so sick and exhausted and

emailed the Board to cancel the hearing. I had no time to prepare, could not sleep, and truly felt sick, but was concerned the State may think I had the plague, Covid-19. Objxn-Ex-EE. I attended the hearing without being afforded an opportunity to prepare, and present my case, call witnesses, perform discovery or even to be human to care for my recovery because I did not want to be held in contempt. I made a special appearance preserving my objections to improper notice, lack of subject matter jurisdiction due to the Delaware Supreme Court's apparent participation in inciting the case, and to object on substantive and procedural Due process and Equal Protections grounds for the disparate treatment against me during the proceeding, and in inciting the proceeding. Objxn.-MOL.

The State knew I was exhausted, recovering from the shingles, lacking of sleep, without being afforded a fair opportunity to prepare and present my case. They did not care about me, or my personal health or my lack of a fair opportunity to present my case for my sake. They appeared to hope I would get sick to use it against me.

I attended the hearing by phone since I had no working computer. Objxn-Ex-GG, D.I. 55-56. Upon receipt of the transcript, I objected, and I object again as the transcript does not accurately reflect my testimony. The reporter placed words that I did not say in my mouth. Objxn-Ex-AA, BB, CC. It appeared the state set me

up. I filed corrections, which in no way make the transcript completely accurate.

Id.

Kathleen, did not participate in this action until after the hearing. She relies on the inaccurate transcript I object to, and demeans me for my lack of a working computer and poverty, as evidence of disability. I am so poor I did not have a phone until sometime in January 2022. My computer did not work at the time of the hearing, and my backup computer also malfunctioned. My confusion as to why the computer was not working was absolutely genuine, and not evidence of a disability.

Kathleen's bad faith, or at best ignorant, attacks display her cold heartless indifference towards the substantial burden poverty has placed upon my defense of exercise of fundamental rights in this case.<sup>22</sup> "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations" *Lewis v. Casey*, 518 U.S. 343, 370 (1996) "Because this case implicates the [Constitutionally protected] right of access to the courts," and other fundamental rights, the government's disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).<sup>23</sup>

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<sup>22</sup> *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001);

<sup>23</sup> *Lewis v. Casey*, 518 U.S. 343, 370 (1996); *Murray v. Giarratano*, 492 U.S. 1, 18 (1989)

The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred. Objxn-Ex-R2, V. The Delaware Supreme Court also indicated it made a determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. Objxn-Ex-V It is notable that both the Board and the court waited until two or three days prior to the hearing to address any matter while ignoring motions, leaving them unanswered.

The proceeding must be dismissed as the Board and the Court both violated my substantive and procedural due process rights in the Board proceeding in bad faith, with objective partiality towards the government, and prejudice against me.

The Third Circuit held, "A judgment may also be void if a court "acted in a manner inconsistent with due process of law."<sup>24</sup>

**IV The Court lacks subject matter jurisdiction for apparently inciting the prosecution, and concealing beneficial evidence in bad faith to prejudice me with partiality to the government to fix the proceeding against**

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<sup>24</sup> *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at \*3 (3d Cir. May 11, 2005). See Respondent's Exhibits to the Hearing ("R-Ex") Exhibits 35, 37 Part 2, 42, R 44

**me in violation of the Procedural and Substantive Due Process Clause  
pursuant to the State under the First and Fourteenth Amendments**

The record shows the Delaware Supreme Court through its agents participated in inciting the proceedings against me, acting as witness, prosecutor and judge, and by concealing evidence by 1. inciting the Court's arms to attack me in *Kelly v Trump*, and the present disciplinary proceeding, 2. collaborating with the Chancery Court and directing Delaware Supreme Court employee Mrs. Robinson to sign off on the departure information of one or two of the former Chancery Court staff workers with information material to my state case, who appeared to lose their jobs, while preventing my opportunity to perform discovery or subpoena the two concealed witnesses, and 3, by eliminating some of the petitions for which the Defendants allege to bring the State action against me, placing them under seal, without notice to me a party, and without lawful reason, such as sensitive information relating to social security or bank accounts, to cover up the Court's and State's lawless acts, with knowledge these petitions are relevant to my defense and the federal proceeding.

Eliminating truth or evidence guarantees injustice. It is my religious belief courts exists to correct and guide those misguided by business greed, profit, position, and power, who sacrifice the lives, health and liberty of others for material gain, essentially selling souls to gain the world, only to lose their own

eternal soul by the sin against the holy spirit, hardness of hearts from caring to think, to know, to love others unless it affects them.

Eliminating evidence hides the truth, or diverse views, allowing only the government-backed private partners' and public views to be protected under the Constitution.

The State seek to eliminate me, just as they cover up wrong doing by eliminating witnesses, forcing them to lose their jobs, under the deception of looking after them, only to look after the mere appearance of justice, not actual justice, and by concealing and sealing my pleadings. The Delaware Supreme Court justices do not care to uphold the fundamental rights of those in my class of one, of a person with unique religious-political beliefs which do not conform to the majority's, the individuals within the ODC and/or the judges on the Delaware Supreme Court.

Eliminating people who petition the Court, as "mentally disabled" for thinking the Court would care to help someone who is poor, or who believes in Jesus Christ or diverse political views in that I seek to care for humanity not control them through money, is disparate treatment based on protected view point, in violation of the Equal Protections Clause applicable to the State pursuant to the First and Fourteenth Amendment. US Amend I, and XIV.

The Delaware Supreme Court incited the State's petition, and concealed my religious-political petitions in bad faith with partiality towards the ODC. Joann and the Clerk of Court at the Delaware Supreme Court admitted that the Court sealed two motions, and Exhibits A-4, and A-5, in *Kelly v Trump*, relating to the Court and its agents' disparate treatment towards me. None of the sealed documents contained sensitive information.<sup>25</sup> **(Exhibits F, G)** This was not for my protection or the protection of the parties, but was to cover up Court misconduct, just as the state seeks to eliminate me to conceal government misconduct by labeling me disabled, disparaging my reputation, to deem me not credible.<sup>26</sup>

The Delaware Supreme Court participated in eliminating potential material witnesses by having an agent sign off on the departure forms for two Chancery Court employees, Arline Simmons and Katrina Kruger. The Court colluded to conceal two people with first hand-knowledge of the facts of this case, despite my motion to subpoena one.<sup>27</sup>

I want the court to stop eliminating documents and witnesses, and do not want the court to eliminate the clerk who raised her voice at me on June 2, 2022, while confirming there was no motion to seal petitions. The court staff who yelled

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<sup>25</sup> DI 62-72

<sup>26</sup> . Objxn-K-Ex-31 See letters of recommendation on my behalf concerning my reputation.

<sup>27</sup> Objxn-Ex-T-U-U-2-V.

at me in the Chancery Court are gone, no longer employed with the Court, and that breaks my heart.

Covering up mistakes by eliminating those who make them is not correction but concealment, allowing it to be ignored not lovingly corrected. The State seeks to eliminate me to conceal its own wrongs instead of learning from them. <sup>28</sup>

The State's elimination of four sealed and concealed docket items and the elimination of two material witnesses from availability through process by service to the Chancery Court is relevant to my defense of retaliation, discriminatory motive, discriminatory purpose, with a discriminatory outcome made to chill my religious-political speech by demeaning my character as disabled, and threatening my bar licensure's status for exercising political-religious speech, contained in petitions, or outside the petitions, which the government disagrees with, based on religious-political viewpoint.

The Court must dismiss the Petition and Board's recommendation because of its own unclean hands, to uphold actual justice, not the mere marketing and appearance of an illusion in this case. Justice is not a business. The exercise of Constitution liberties is not for sale. Otherwise only the wealthy, well connected, and powerful have something to exchange. Leaving the poor, including me, not

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<sup>28</sup> Objxn-MOL



free, but for sale, having only our own soul to sell in exchange by indebtedness, which violates my religious beliefs, to exercise what are not liberties, freedom of conscience, belief, speech, association, exercise and petition.

**V. The Delaware Supreme Court lacks subject Matter Jurisdiction for procedural and substantive due process violations in causing the petition and for maliciously violating my due process rights during the Board proceeding.**

The Delaware Supreme Court lacks subject matter jurisdiction by its 1<sup>st</sup> and 14<sup>th</sup> Amendment substantive and procedural Due Process violations based on its prejudicial treatment in inciting the petition, and disparate treatment during the proceeding.

The Court disregarded my religious beliefs against appointment of counsel, requiring I file multiple pleadings to fight against government compelled violations against my religious beliefs.<sup>29</sup> The Court disregarded my motion concerning the ODC's fraud, committed in bad faith by lying, seeking to commit fraud, concerning receipt of my answers.<sup>30</sup> The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First

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<sup>29</sup> Objx-Ex-I-P-2

<sup>30</sup> Objxn-Ex-L

Amendment rights already occurred.<sup>31</sup> The Delaware Supreme Court also indicated it made a determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. It is notable that both the Board and the court waited until two days prior to the hearing to address any matter while ignoring motions, leaving them unanswered.

#### **VI. The State abused its discretion by Vindictive prosecution**

The record shows no legitimate objective reasons to bring the petition against me, or to deem me disabled or a danger to the public as an attorney with an active license to practice law. The State brought the petition against me with animus, to cover up state lawless acts, and to punish me for my religious-political speech and beliefs contained in my petitions.

The record does not support I am suffering from a physical or mental condition adversely affecting my ability to represent others in the practice law. I am reasonably and foreseeably emotionally distressed by the State's unconstitutional application under the color of the DLRDP, as applied to me for

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<sup>31</sup> Objxn-Ex-R, R-1, R-2, S,

my exercise of religious-political speech, petitions, exercise, association and beliefs.<sup>32</sup>

The state discriminates against me by seeking to take away my active license to practice law based on disdain for my personal-religious-political petitions reflecting my beliefs, speech, association and exercise, essentially persecuting me for all these fundamental rights in violation of my substantive and procedural Due Process rights. The ODC admits it brings this petition based on my religious-political petitions per its August 23, 2021 letter and religious beliefs it finds illogical, per the petition at number 7, is “evidence of the prosecutor's retaliatory motive to prove actual vindictiveness.” (Exhibit D and E, attached hereto).<sup>33</sup>

The District Court held in *U.S. v. Roberts*, 280 F. Supp. 2d 325, 30-31 (D. Del. 2003)

The Due Process Clause... “protects a person from being punished for exercising a protected statutory or constitutional right.” *United States v. Goodwin*, 457 U.S. at 372. The Supreme Court has held that “while an individual certainly may be penalized for violating the law, he just as certainly may not be punished for exercising a protected statutory or constitutional right.” *Goodwin*, 457 U.S. at 372; *Blackledge v. Perry*, 417 U.S. 21, 28-9 (1974). To punish a defendant because he has done what the

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<sup>32</sup> *State v. Holloway*, 460 A.2d 976, 978 (Del. Super. Ct. 1983) “Though the law itself be fair on its face and impartial in appearance, yet, if it is applied and administered by public authority with an evil eye and an unequal hand, so as practically to make unjust and illegal discriminations between persons in similar circumstances, material to their rights, the denial of equal justice is still within the prohibition of the constitution.”

<sup>33</sup> Citing, *U.S. v. Reynolds*, 374 F. App'x 356, 361 (3d Cir. 2010), Objxn-Ex-P-internal-Exhibit-A, Ex-P-Internal-Exhibit-A-part 2, Ex-H.

law permits is a due process violation. *Bordenkircher v. Hayes*, 434 U.S. at 363; *United States v. Andrews*, 633 F.2d 449, 457 (6th Cir. 1980); *States v. Paramo*, 998 F.2d 1212, 1220 (3d Cir. 1993).

The government did not meet its burden by providing, objective legitimate reasons for its conduct. The government's justification is pretextual. Actual vindictiveness has occurred in my case. *Id*

The Third Circuit held, “it is an elementary violation of due process for a prosecutor to engage in conduct detrimental to a ... defendant for the vindictive purpose of penalizing the defendant for exercising his constitutional right to a trial,” as I exercised in *Kelly v Trump*. *U.S. v. Paramo*, 998 F.2d 1212, 1219 (3d Cir. 1993).

The Court must presume vindictive prosecution that deprived me of due process in this case, requiring dismissal of the petition against me, since ODC admitted it prosecutes me in retaliation for my personal-religious petitions and personal-religious beliefs. **(Exhibits E, F)** <sup>34</sup>

The Third Circuit in *U.S. v. Paramo*, 998 F.2d 1212, 1220 (3d Cir. 1993), held, “The presumption of vindictiveness is a prophylactic rule designed to protect a defendant's due process rights where a danger exists that the government might

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<sup>34</sup> *United States v. London*, No. 15-1206, at \*5 (3d Cir. Aug. 31, 2018); *United States v. Stafford*, No. 19-3833, at \*14 (3d Cir. Dec. 20, 2021); (*U.S. v. Reynolds*, 374 F. App'x 356, 361 (3d Cir. 2010) “Prosecutorial vindictiveness may be found when the government penalizes a defendant for invoking legally protected rights.”); *United States v. Hollywood Motor Car Co.*, 458 U.S. 263, 273-74 (1982).

retaliate against him for exercising a legal right.” See *Bordenkircher*, 434 U.S. at 363, 98 S.Ct. at 667-68; *United States v. Esposito*, 968 F.2d 300, 303 (3d Cir. 1992)

The District Court in *United States v. Figueroa*, Criminal No. 14-00672 (SRC), at \*16 (D.N.J. Apr. 26, 2021) cited the Third Circuit while holding,

“A presumption of vindictiveness can only be adopted “in cases in which a reasonable likelihood of vindictiveness exists[,]” that is when “the situation presents a reasonable likelihood of a danger that the State might be retaliating against the accused for lawfully exercising a right.” *United States v. Esposito*, 968 F.2d 300, 303 (3d Cir. 1992).

Here, the ODC admits to be retaliating against me for lawfully exercising my rights, by my religious beliefs, reflected in my speech, contained in my petitions, in violation of the First and Fourteenth Amendment, with no other objective reasonable evidence on the record to sustain a judgment of disability, evidencing actual animus to rebut its animus. **Exhibits A, B**; *United States v. Esposito*, 968 F.2d 300, 303 (3d Cir. 1992); *U.S. v. Korey*, 614 F. Supp. 2d 573, 582 (W.D. Pa. 2009).

“Vindictive prosecutions in response to a defendant’s exercise of protected statutory and constitutional rights are...prohibited.” *Anderson v. Metzger*, Civil Action No. 16-174-CFC, at \*17 (D. Del. Dec. 14, 2018); See *United States v. Goodwin*, 457 U.S. 368, 372 (1982).<sup>35</sup>

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<sup>35</sup> *U.S. v. West*, 312 F. Supp. 2d 605, 617-18 (D. Del. 2004); Citing, *United States v. Schoolcraft*, 879 F.2d 64, 67 (3d Cir. 1989).

Kathleen's vain arguments by repeating DLRDP Rules that applied to other proceedings, but not mine, or pointing to the Board's bad faith conclusions based on its own partial participation in the fixed proceeding against me where the Board denied me equal protection and substantive and procedural due process rights fails as a matter of clear error of law. US Amend I, XIV.

Kathleen claims "the religious provisions of the US and Delaware Constitutions do not prohibit the Court acting through the Board, from proceeding with disability action against [me] based upon [my alleged] incapacity to practice law." KV-Pg-32 The US Constitution certainly does prohibit this disability proceeding, in my case. Since the state claims my religious-political petitions, displaying religious-exercise, religious-speech, religious-association and religious-beliefs is the insidious reason for a claim of disability. The Court through its arm, the Board, does not have subject matter jurisdiction to regulate my exercise of fundamental rights, including the right to bring personal-religious-political petitions, when the Court disagrees with my religious-political beliefs under the sham of respondent's practice of law. This Court may not regulate religious speech and religious beliefs under the shield of regulating business, the profession. The Courts must not sell fundamental rights, in exchange for professional licenses, making those who work for money less free by government backed private

partners, sacrificing individual liberties, the free exercise of religious belief in Jesus, in exchange for the right to buy and sell.

Kathleen's wrongly asserts the Court has the authority to order the examination of my person, in violation of my religious beliefs and exercise, while the State ignored my motions relating to religious objections to health examinations and mental health examinations. Objxn-K, paragraphs Obxn-Q. There is no legitimate interest or compelling interest somehow more important than my exercise of fundamental liberties, narrowly tailored to uphold such interests in this partial proceeding to compel me to violate my religious beliefs and exercise by such examinations. Mental and physical examinations are against my religious beliefs and exercise. *Id.*

Kathleen's citation to an abrogated case *Middlesex*, merely related to procedural due process concerns relating to lapse of time, is distinguished from my case. *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, (1982); *Abrogation Recognized by Harmon v. Department of Finance*, 3rd Cir.(Del.), April 27, 2020; *Citing, Sprint Communications, Inc. v. Jacobs*, 571 U.S. 69,(2013), *Malhan v. Sec'y U.S. Dep't of State*, 938 F.3d 453, 462 (3d Cir. 2019).

My case relates to the State's prosecution against me for my exercise of genuinely held religious-beliefs, religious-political speech, religious-political-

association, and the right to petition the courts when I believe there has been a grievance against me by a government agent, no matter my poverty, religious beliefs, or political orientation.

Kathleen's arguments that a determination against me would not impede on my religious worship fails too. The practice of law is a religious exercise, not done for mere pay. *Amos* 5:15, *Matthew* 23:23. I ran for office to draft just decrees and drafted 5 proposals to impeach President Trump, without pay, to help the oppressed in accordance to God's will which teaches justice with mercy, not money, saves lives and eternal lives, by correction to prevent condemnation.<sup>36</sup>

The Court's transfer of my license to disability inactive violates my free exercise of religion, as punishment for my personal-religious-exercise, speech, association, petitions, and beliefs.

My Constitutionally protected religious-political beliefs are in issue as the source of the vindictive prosecution against me brought to punish me for the exercise of religious liberties which the state, and government backed private partners' and professions, disagrees with. I am being persecuted for believing in

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<sup>36</sup> Objxn B-2, K-Ex10-11, Objxn-Ex-N, *Tate v. Cabbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, \*1, 58 Del. 430, 433, ("It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings.")



Jesus Christ and my personal political beliefs. It is my religious-political belief that the government and the courts are in danger of being overthrown by the elimination of the dollar, a planned, preventable, reversible, economic crash to eliminate the governments' function by a takeover by private partners through a collective group of private central banks, including the Federal Reserve.<sup>37</sup>

KV asserts my political-religious beliefs and concerns by the pleas relating to the World Economic Forum's Founder's plan to crash the global economy were not relevant to the proceeding, and wrongly asserts I admit my concerns about lawlessness are not relevant, is misleading. My religious-political beliefs are in issue and are relevant, as the source of insidious government persecution against me and my property interest in my license to practice law. My pursuit of justice and just decrees are relevant, as I corrected myself on the record. (See transcript 46, 42-44) My love for others beyond my own, and my concern at compelled, controlled oppression, injustice and unjust decrees show I am an aide, not a danger to the public. 46. The record shows my conduct, caring for others, and standing up for those without opportunity are relevant in how my conduct as an attorney is beneficial to the public, not a threat to society. Id. There is evidence the Great depression was planned unnatural by bankers who gain more profit and debt control the worse off the government and the people are. Objxn-Ex-K-internal-Ex-

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<sup>37</sup> Objxn-B-2, K-Ex-12-13-14-15-16-17-18-19

18. I showed the Court evidence of a planned elimination of the dollar, and a planned by design economic crash, which this Court has the authority to prevent or reverse, no matter what some misguided expert opines. Objxn-Ex-K-Ex 12, 13, 14, 15, 16, 17, 19, and Objxn-GG.

Although the State seeks to destroy my life, by taking away my liberty under the threat of government persecution for exercising fundamental rights, and my ability to buy and sell for not worshipping what I believe to be the mark of the beast, the profession, business greed, this court is my hope of a hero of a planned elimination of the dollar, global economic crash, and way of government. I alerted the Court on how to prevent or reverse the crash. Objxn, page 47, 51-52; Objxn-F, G, H, GG. I should not be disciplined for my religious-political beliefs and speech, even if this State rejects my religious-political beliefs and personal religious concerns.

### **The State abused its discretion by Selective Prosecution**

I have met my burden of proving by clear evidence the State abused its discretion by selective prosecution “to overcome the regularity that attaches to decisions to prosecute,” which is not rebutted by the record.<sup>38</sup> Kathleen’s and the

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<sup>38</sup> United States v. Wood, Criminal Action No. 20-56 MN, at \*4-5 (D. Del. July 20, 2021); Citing, United States v. Taylor, 686 F.3d 182, 197 (3d Cir. 2012)

Board's vain assertions," rests upon clearly erroneous findings of fact, an errant conclusion of law, and an improper application of law to fact." <sup>39</sup>

"Although prosecutors enjoy wide discretion, they may not prosecute based on a defendant's "race, [political affiliation] or other arbitrary classification."

*United States v. Gist*, 382 F. App'x 181, 183 (3d Cir. 2010).

A "selective-prosecution claim is not a defense on the merits to the criminal charge itself, but an independent assertion that the prosecutor has brought the charge for reasons forbidden by the Constitution." *United States v. Armstrong*, 517 U.S. 456, 463 (1996).

The United States Supreme Court in *United States v. Armstrong*, 517 U.S. 456, 464-65 (1996) held,

a prosecutor's discretion is "subject to constitutional constraints." *United States v. Batchelder*, 442 U.S. 114, 125 (1979). One of these constraints, imposed by the equal protection component of the Due Process Clause of the Fifth Amendment, *Bolling v. Sharpe*, 347 U.S. 497, 500 (1954), is that the decision whether to prosecute may not be based on "an unjustifiable standard such as race, religion, or other arbitrary classification," *Oyler v. Boles*, 368 U.S. 448, 456 (1962). A defendant may demonstrate that the administration of a criminal law is "directed so exclusively against a particular class of persons . . . with a mind so unequal and oppressive" that the system of prosecution amounts to "a practical denial" of equal protection of the law. *Yick Wo v. Hopkins*, 118 U.S. 356, 373 (1886).

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<sup>39</sup> *United States v. Gist*, 382 F. App'x 181, 183 (3d Cir. 2010)

The Record shows a colorable basis (1) I have been singled out for prosecution while “persons similarly situated, [based on religious-political lawsuits deemed frivolous] have not been prosecuted [by the ODC,]” for the same type of conduct, and (2) the State's discriminatory prosecution of me has been invidious and in bad faith, that is, deliberately based upon impermissible considerations including religion, poverty, political-affiliation and religious-political protected speech contained in petitions, to prevent me from exercising fundamental rights of religious-political-petitions, religious-political-beliefs, religious-political-exercise, religious-political-association, and religious-political-speech.<sup>40</sup>

The State’s prosecution against me is made in retaliation for my personal-religious-political-petitions, reflecting personal religious-political-beliefs, including religious-political-speech and association in *Kelly v Trump* and for bar dues. The application of the DLRDP, as applied to me, violates my First Amendment fundamental liberties, applicable to the state pursuant to the Fourteenth Amendment, against me, as a party of one, as an indigent, lawyer with personal, unique religious-political beliefs under the Equal Protections Clause.

proceeding against me to punish me for my religious-political beliefs.

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<sup>40</sup> *U.S. v. West*, 312 F. Supp. 2d 605, 618 (D. Del. 2004); *State v. McGuiness*, ID 2110001942, at \*4 (Del. Super. Ct. Apr. 13, 2022); *Albury v. State*, 551 A.2d 53, 61 n.13 (Del. 1988);

The record clearly shows the State had a discriminatory purpose, to selectively prosecute me for my religious-political exercise of fundamental rights.

I found no evidence of any other party or member of the Bar indicating anyone has ever been prosecuted for a RFRA claim, to alleviate a substantial burden upon exercise of religion. I am solely selectively being prosecuted.

My transfer to disability would have a discriminatory effect by chilling me, and potentially other professionals from exercising fundamental rights, which the majority or the profession as a whole may disagree with, thereby stifling freedom of thought, critical thinking, and debate, dumbing down professionals and experts by the mob reign of professional trained lusts replacing the hope of the impartial rule of law.<sup>41</sup> Deeming me disabled for suing the President of the United States, shows that the State believes the powerful are protected by the law, but the poor or those with religious beliefs in God, not worship of money as savior, are not. Other indigents and others with religious beliefs the State rejects, may be chilled from exercising their free speech, religious beliefs, religious exercise right to petition out of fear of being be deemed disabled, or similarly economically persecuted, for assuming the Constitutional protections afford them equal rights too. Deeming me as disabled for suing the government to dissolve the establishment of government

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<sup>41</sup> *United States v. Schoolcraft*, 879 F.2d 64, 68 (3d Cir. 1989).

religion which has placed a substantial burden upon my exercise of religious beliefs because the state disagrees with my belief in God as savior not what I believe is the mark of the antichrist, the profession as God or guide, its purpose to gain money, business greed or money as savior, shows the state protects religious viewpoints which conform to its will, rendering free will, and freedom to believe to only those who believe in like matter with the State or its government backed partners, such as the Disciplinary counsel who appears to care about sacrificing the Constitutional law to serve the profession's appearance, profit and prestige, not the public. I believe what they fight for is lawlessness, sacrificing constitutionally protected liberty, lives and health to serve their profession, essentially sacrificing other people's souls to serve their own conditional interest with no unconditional love in them like a pack of wolves pretending to be shepherds.

Those who serve money, or whose focus is on making money and the economy and jobs, serve greed, not their country, misleading their people to harm by controlling the people instead of caring for them by protecting their liberty.

True justice, is laying down conditional interests, in comfort, costs, convenience, to serve, by choosing to independently think, caring to know, in order to love, protecting even those you may be correcting by improving the world, not condemning it.

The State abused its discretion in seeking to prosecute me for my religious-political petitions. The State engaged in selective and vindictive prosecution with animus and bad faith by seeking to deem me mentally disabled, to deem my faith in God as guide, not money as guide, as a disability, and to conceal the State misconduct against me in this proceeding.

The record clearly provides evidence of discriminatory effect and discriminatory intent. Objxn, MOL. *United States v. Bass*, 536 U.S. 862 (2002)

I am not disabled for asserting the President and the courts adhere to the Constitutional rule of law by seeking to dissolve the establishment of government religion. Neither the courts, nor the president is above the law, nor should a citizen, I, be adjudicated as mentally disabled, but for, the conduct of bringing a lawsuit against government agents when I believe the agents committed a grievance against me. Winning or losing is not the standard. Otherwise half the parties would be deemed mentally disabled. I believe this court erred as a matter of law in deeming my material arguments to dissolve executive orders, which establish government religion based not on freedom, but bartered business, as frivolous in *Kelly v. Trump*, 256 A.3d 207 (2021) for the reasons contained in the attached Order. (Exhibit H).

The Disciplinary proceeding is brought, in part, to suppress free speech to cover up State misconduct, by defaming my character and reputation as uncredible, and to discriminate against me based on my religious-political viewpoint, with no important interest unrelated to the suppression of free speech, and my exercise of fundamental rights, and without using the least restrictive means narrowly tailored to meet any legitimate interest.<sup>42</sup>

The Board of Professional Responsibility's ("Board") Report ("Report") must be rejected, and the Delaware Supreme Court must dismiss this petition. The ODC failed to present and the Board failed to find by clear and convincing **evidence** I am incapacitated from continuing to practice law. The Board's findings in this fixed, sham proceeding in partial colluding forums must be rejected as a matter of law, and as a matter of fact to prevent manifest injustice.

Further the State fails to achieve a compelling or overriding government interest narrowly tailored, using the least restrictive means, to meet that interest to discipline me for the exercise of Constitutionally protected conduct, including but not limited to my religious-political petitions, religious-political speech, religious-political association, religious-political beliefs and religious-political exercise by

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<sup>42</sup> *Wayte v. United States*, 470 U.S. 598, 599 (1985); *United States v. O'Brien*, 391 U.S. 367 (1968); *Arcara v. Cloud Books, Inc.*, 478 U.S. 697, 707 n.4 (1986); *Nieves v. Bartlett*, 139 S. Ct. 1715, 1721, 1722, 1729 (2019)



demeaning my character, and preventing me from seeking to return to my former job, rendering me potentially unemployable as "disabled," during an impending economic global recession and potential depression, where the unemployment rate is schemed to be about 47 percent in the US. Objxn-K-Ex-16.

Wherefore, I pray this Court rejects the Board's decision and dismisses this matter with prejudice.

June 7, 2022

Respectfully submitted,



Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Bar No. 4968

I declare and affirm that the foregoing statement is true and correct under the penalty of perjury.

Dated: June 7, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

# Appendix I

## THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the )	Board Case No. 115327-B
Supreme Court of the state of Delaware )	Misc. 541,
Meghan M. Kelly, respondent. )	<b>Supreme Ct. No. 58, 2022</b>

Respondent Meghan Kelly's Objections to the Report and Recommendation on  
Petition to Transfer to Disability Inactive Status, but for my exercise of  
Constitutionally protected conduct and motion to vacate and overrule the Board's  
decision by signing the attached order

AND NOW this March 21, 2022, pursuant to Delaware Disciplinary Rule 9  
(e), respondent, Meghan M. Kelly, pro se, hereby objects to the Board on  
Professional Responsibility of the Supreme Court's (individually "Board,"  
Collectively with the petitioner, "State") Report and Recommendation on Petition  
to Transfer to Disability Inactive Status to place me on "disabled inactive attorney  
status until a qualified mental health expert can certify (my) fitness to practice  
law," but for my exercise of the right to petition the courts to address a grievance  
against my person caused by President Donald J. Trump's establishment of  
government religion, for my religious beliefs, and exercise of Constitutionally  
protected rights, including my free exercise of association, religion, speech, and the  
right to petition the Courts to inter alias safeguard my religious beliefs in Jesus, not

money or business greed as savior, and moves the Court to vacate and overrule the Board's decision by signing the attached order. <sup>1</sup>

1. In addition to the basis of objections included herein, additional sources of my objections are included, and incorporated herein by reference, in the Memorandum(s) of Law in Support of my Objections I file contemporaneously herewith, and are to be considered collectively, as one including Respondent's Memorandum of Law in Support of my Objections to the Report and Recommendation on Petition, and to the Petition, as Unlawfully brought by the state, as applied, with no legitimate purpose, to conceal lawless acts by the State and Delaware Courts, in violation of my First Amendment protected Constitutional exercise of rights and in violation of my Due Process Rights by denying me a fair and impartial trial in a fixed proceeding.

2. In addition to the objections incorporated herein and in the documents included by reference: 1. I object to the Report and Recommendation on Petition, and the Proceeding, as unlawful as applied to me, in violation of the procedural and substantive due process clause, and in violation of the Equal Protections Clause applicable to the State pursuant to the Fourteenth Amendment by the State's disparate treatment against me, in collusion, or conspiracy, obstruction,

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<sup>1</sup> Report and Recommendation of Petition to Transfer to Disability Inactive Status, dated Feb. 17, 2022, I did not receive until Feb 18, 2022 by email, which I objected to as improper service, not paper form, ("Report") at 2, I maintain my objection herein based on improper service.

participation, and interference with my exercise of protected activity in defending my exercise of fundamental rights in the Matter of Meghan Kelly, Board No 11537B, and Supreme Court Number 541, denying me a full and fair opportunity to be heard, and Equal and fair access to the Court's, making the Board's decision void, to prevent manifest injustice and fraud. (Transcript as amended with Corrections 6-7, 78, 87, 69, 73-79, 81, 83, 87, 94-96, 98-194, 110-11, 162-164, 171, 190-192, attached as **Exhibits Z, and CC**); 2. I Object to Report and Proceeding as unlawful, as applied to me, brought without lawful purpose, under the color of the law in retaliation against me, discriminating against me by disparate treatment and punishing me, but for my exercise of fundamental rights, of speech, political association, the right to petition the courts, religious exercise and my religious beliefs in violation of the First Amendment applicable to the State pursuant to the Fourteenth Amendment. (Exhibit Z and CC and its entirety.); 3. I object to the Report and Recommendation on Petition, and to the Petition, as Unlawfully brought by the state, as applied, with no legitimate purpose, brought to conceal or trivialize illegal state agent behavior, in interference with my petitions relating to waiver of bar dues due to economic hardship, and my petitions relating to *Kelly v Trump*, including petitions relating to state attacks against me to harass, interfere or forgo my lawsuit against former President Trump and to prevent future petitions, in violation of my First Amendment protected Constitutional exercise of

rights, and in violation of my Due Process Rights by denying me a fair and impartial trial in a fixed proceeding. (Id.); 4. I object to the Report and Recommendation on Petition, and to the Petition, as unlawful as applied to me, in violation of my procedural and substantive due process rights, due to the Delaware Supreme Court's apparent participation in inciting the complaint filed against me on or about November 5, 2021 in the state forum, rendering it impossible for the court to grant me a fair trial by its own apparent participation on the state's behalf. (Id.); 5. I object to the State seeking to compel me to violate my religious beliefs by undergoing a mental professional examination or lose my active license to practice law, but for my religious beliefs. (Id.)<sup>2</sup>

**I. Procedural History, with some Argument, Numbered for ease**

3. In September of 2020, I initiated a law suit against former President Trump, *Kelly v Trump* in the Chancery, No. 2020-0809, Delaware Supreme Court, No. 119-2021, and the United States Supreme Court, No. 21-5522, to alleviate a government burden upon my religious exercise, pursuant to the *Religious Freedom Restoration Act*, 42 USC § 2000bb-2000bb-4 ("RFRA"), by the establishment of government religion. (See, The ODC's Petition Exhibit A, Second Amended

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<sup>2</sup> I originally started drafting these 5 objections in Memorandums of Law, but I lost my files on a memory stick as I was attempting to save it on a backup memory stick around March 16, 2022, and was required to swiftly draft my objections, in an urgent matter with less importance on the ease of the reader, and with more importance preserving my objections for appeal, since the Court declared "no further extensions would be granted." (Exhibit HH)

Complaint, attached hereto as **Exhibit A**) (Please refer to the attached table of exhibits of objections for ease in identifying exhibits)

4. In October of 2020, a Chancery Court staff member, Arline Simmons, directed me to cross off the address of the Attorney General for the District of Delaware, to apparently prevent service and obstruct my case from going forward. (See, *Meghan M. Kelly's answer, defenses, and objections to ODC's petition to transfer Meghan M. Kelly, Esquire to disability inactive status*, with a table of contents, and exhibits 1-34, attached in its entirety as **Exhibit K**, referred to herein as "Ans" and "Ans-Ex" for Exhibits, and see, Ans-Ex 4, attached hereto as **Exhibit B**)

5. On October 19, 2020, I wrote the Chancery Court Master, the Honorable Patricia W. Griffin, ("Master"), a letter concerning the fact I was acting as a party, not as an attorney, as I sought to retrieve subpoenas. I also indicated my concerns of an economic crash, and my hope the court would prevent or reverse a planned economic crash with tools attorneys may use to cut through entities. (**Exhibit B-2**).

6. On November 2, 2020, the Master drafted her final report dismissing my case allegedly based on lack of standing, as frivolous.

7. I did not know of the Master's final report until November 6, 2021, despite contacting the Court after the decision and prior to this date. I contacted

the Court by phone to check on the status of the subpoenas either before or after election day, of November 2020, and the Chancery court staff member, Arline Simmons, advised me to hold off on picking up subpoenas until routine paper work gets to me. I asked if I was in trouble. She indicated I was never in trouble. I googled my name, Friday November 6, 2020, and discovered indeed I was in trouble. The Master ruled against me on November 2, 2020. I drove up to the Court House to pick up the decision on November 6, 2020. I was required to file something by the next business day, Monday November 9, 2020, or waive my right to petition. Arline Simmons misled me to almost miss my deadline to file an appeal to the Master's final report, based on her apparent disagreement with my political-religious beliefs or deeming me unworthy of a right to be heard based on my poverty and lack of resources.

8. On November 9, 2020, I filed a letter with my Notice of Exceptions with the Chancery Court, dated November 6, 2020, petitioning the Court regarding the Chancery Court staff member misleading me to almost miss the appeal filing deadline, my confusion as to why I did not receive a subpoena for the amended complaint and the second amended complaint to serve the US Attorney General, and my concerns relating to President Trump inciting an insurrection, with attached parts of the insurrection act and newspaper articles, showing the use the military's threat of force to incite violence, under the deception of keeping the



piece. (This is found on the record as an Exhibit to December 1, 2021 letter filed with the Delaware Supreme Court, matter 541, and is attached hereto as **Exhibit B-3**).

9. On December 1, 2020, I filed a letter petitioning the Honorable Master Patricia Griffin for help relating to the Chancery Court's staffs' "disparate [treatment towards me] based on my wealth, political affiliation and or religious orientation, and [indicated I would] continue to receive such treatment without her assistance." (Asw-Ex 27, Page 1 of December 1, 2020 letter, attached as **Exhibit C**).

10. Master Griffin granted me relief on December 7, 2020, by letter.  
(Ans-Ex 28)

11. On December 11, 2020, I wrote a letter to Master Griffin thanked her for her relief, and indicated my shock she helped me. I outlined other disparate treatment I received when I asked for help, including when my Delaware bar materials were destroyed at Widener by a flood through the ceiling of a dorm room, and I asked the arms of the Supreme Court for help, only to get scolded, and when rat babies infiltrated my Law School apartment as I studied for my finals and the Pennsylvania Bar, only to have increased rent from the law school. (See, Ans-Ex 28, attached hereto as **Exhibit D**, excluding some internal exhibits)

12. I filed an appeal with the Chancery Court on or about December 5, 2020. The right to a speedy trial was suspended during this time, due to the state of emergency of the global pandemic.

13. On January 6, 2021, to our nation's horror an attempted insurrection at the capital occurred, to keep President Trump in office.

14. On that same day, January 6, 2021, the Vice Chancellor Paul A. Fioravanti, Jr., accepted my appeal, probably with a courageously loving heart to safeguard our nation from a coup by keeping his thumb on the President should the attempted insurrection spread.

15. On January 20, 2021, Defendant Trump was removed as President and replaced with President Biden.

16. On January 7, 2021, I sent a petition unrelated to *Kelly v Trump* to the Delaware Supreme Court. I sent a letter to Chief Justice Collin Seitz seeking suspension of lawyer fees for lawyers unemployed during the global pandemic. I attached negotiations with my former firm, who I hope will still consider me for a potential position performing real estate settlements. (Ans-Ex-20, attached hereto as **Exhibit E**).

17. On February 2, 2021, I received a letter from Delaware Supreme Court, dated February 2, 2021, noting the Court would make a case-by-case determination of waiver for attorney dues. (Ans-Ex-21).

18. On February 5, 2021, I sent the Delaware Supreme Court a second request concerning DE attorney dues, indicating I could not ask the Court to violate the Equal Protections Clause by treating me disparately when five or more other lawyers were similarly situated. I made a second request relating to the fees for 2022. (Ans-Ex-23, attached hereto to as **Exhibit F.**)

19. On February 6, 2020, I paid \$353.00 for my active attorney dues on February 6, 2021. (Ans-Ex-22).

20. On March 26, 2021, the Vice Chancellor overruled my exceptions to Master's final report and affirmed the Master's rulings on grounds of standing.

21. In the middle of April of 2021, Judge Kenneth S. Clark, of the Court of Common Pleas in Delaware, used the color of law to intimidate me to cause me to forgo my case, interfere or harass me for my pleadings in *Kelly v Trump*. Judge Clark confronted me at BJ's, located in Millsboro, Delaware, a grocery store warehouse, and required I call him or come to his chambers for an interrogation. I declined. I asked Judge Clark if the ODC (a.k.a. Office of Disciplinary Counsel), instructed him to interrogate me. He shook his head up and down, indicating yes, the arm of the Delaware Supreme Court instigated his interference with my law suit. I told Judge Clark "I was disappointed in him" for interfering with my access to the courts. He knew better.

22. On or about April 20, 2021, I appealed the Vice Chancellor's decision with the Delaware Supreme Court.

23. On May 24, 2021, DE-Lapp sent me an E-mail with a letter threatening me, by requiring I respond to their request to interrogate me in person or virtually, within 10 days, because they heard I was having trouble paying my bar dues, after I already paid my attorney dues. (Ans-Ex 24, attached hereto as **Exhibit G**).

24. The next day, on or about May 25, 2021, rightly upset by DE-Lapp's threat, Judge Clark's and the Chancery Court staff's obstruction of my case based on poverty, religious beliefs or political beliefs, I filed *Appellant's Motion for the Delaware Supreme Court to reign in its agents from unlawfully pressuring Appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just*, to petition the court to alleviate "actions by state government agents taken to apparently impede and obstruct my access to the courts."

25. To my horror, I realized that DE-Lapp appeared to have received the information relating to my request to suspend attorney fees from the Honorable Chief Justice of the Delaware Supreme Court, since I wrote him a request to suspend lawyer fees for lawyers unemployed during the global pandemic. So, on May 28, 2021, I filed *Appellant's Motion for the Delaware Supreme Court to require the recusal of the Honorable Chief Justice Collins J. Seitz, Junior in this*

*matter*. I later discovered the entire Supreme Court reviews petitions relating to bar dues because I asked the clerk of the Court.

26. The Delaware Supreme Court affirmed the decisions below, on July 7, 2021.

27. A timely petition for rehearing, was thereafter denied on the following date, July 19, 2021.

28. On August 23, 2021, the ODC sent a letter to me indicating it reviewed several pleadings from the Chancery Court and the Delaware Supreme Court. The ODC alleged the contents of my pleadings “raised concerns about my fitness to practice law.” ODC requested I submit to a mental evaluation. (Ans-5).

29. I responded to the ODC via email,

“No, I will not be evaluated. I have religious opposition to mental health and healthcare. Do not interfere with my case any further. I am trying to file a writ of cert as we speak.

Stop impeding justice, to bend my freedom of conscious to your will. My belief in Jesus may appear to be crazy to you, but my freedom to believe as I choose is a protected right, same as they right to an unobstructed trial. Desist in contacting me.” (Ans-Ex-6)

30. On August 23, 2021, I filed a writ of certiorari with the US Supreme Court from the Delaware Supreme Court’s order dismissing the case. My computer crashed that same date. (Ans-Ex 1 and Ans-Ex 8).

31. On August 28, 2021, I sent another email to the ODC stating,

“This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in

my petition for writ of cert, relating to emotional damages related to the President's conduct.

Desist impeding in my right to access to the courts without government obstruction and retaliation for exercise of my first Amendment rights. I am an injured party, not an attorney practicing law in this case.

A court staff member sought to sabotage my case by misleading me to almost miss the filing deadline to appeal the Master's final report, dated November 2, 2020.

That same staff member instructed me to cross off the civil process clerk's address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing.

Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful.

I do not seek disciplinary recourse at this time should this arm of the Supreme Court and other members of the government refrain from persecuting me based solely on exercise of my Constitutional rights based on religion, association or poverty.” (Ans-Ex 7).

32. On October 25, 2021, I filed a complaint in the Delaware District Court against the Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel, David A. White, Disciplinary, Counsel Kathleen M. Vavala, Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Delaware Attorney General, Kathleen Jennings, in her capacity as Delaware for interference with Kelly v Trump, to enjoin this unlawful action, and for damages for emotional distress. (ODC’s Hearing Exhibit 5, Attached as **Exhibit H**)

33. On October 26, 2022, I contacted Renee Buskirk, at the ODC concerning requesting information from Chief Justice Collins J. Seitz, Jr., to

determine whether he or the entire court incited the petition by the state against me for my January and February requests relating to license dues. (**Exhibit H-2**, Also found in *Respondent Meghan M. Kelly Amended Exhibits to Hearing she made a special appearance to attend reserving her objections to dismiss based on lack of subject matter jurisdiction due to the Court's members participation in inciting the unlawful petition and lack of subject matter jurisdiction due to illegality as applied*. Exhibit 48)

34. On November 1, 2021, the United States Supreme Court denied my writ of certiorari in *Kelly v Trump*, No. 21-5522, and the case closed. (**Ans-Ex 1**).

35. On November 5, 2021, the ODC brought a Petition to Transfer to Disability Inactive.

36. On November 18, 2021, the ODC filed a letter with the Court to request appointed counsel on my behalf despite notice of my objections based on religious beliefs, via emails to the ODC.

37. On November 22, 2021, I sent a letter to the Delaware Supreme Court regarding my intent to object to appointed counsel based on religious grounds and poverty. (**Exhibit I**)

38. On November 23, 2021, I sent the Delaware Supreme Court a letter regarding my intent and stated,

“I intend to file objections to the Office of Disciplinary Counsel’s (“ODC’s”) petition filed on November 4, 2021, with the Board on

Professional Responsibility to transfer me to disability inactive based on lack of subject matter jurisdiction.

The evidence will show the Delaware Supreme Court through its members or agents instigated the ODC's proceedings against me which creates manifest prejudice against me, or at least appeared to instigate the ODC's proceedings against me, giving the appearance of lack of partiality, and the inability to grant me a fair trial in the above referenced matter.

In addition, the ODC brought the proceedings against me, unlawfully as applied, in violation of my protected rights under the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

This Honorable Court lacks subject matter jurisdiction based on illegality of proceeding.

The Chancery Court lacked jurisdiction to enjoin the ODC since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.” (**Attached as Exhibit J**)

39. On November 19, 2021, I mailed out my answers and objection to the petition on November 19, 2021. (The Answers and Exhibits are all incorporated herein by reference, and are referred herein as “Ans,” and are attached as **Exhibit K**, with its own table of contents, and exhibits thereto)

40. On November 30, 2021, after the deadline for me to provide my answer to the petition, Office of Disciplinary Counsel Patricia Swartz indicated by E-mail, she did not receive the answers in order to commit fraud to throw out the case, despite the confirmation of receipt indicating otherwise. (**Exhibit L**)

41. That same day, November 30, 2021, I mailed out a second set of answers. I returned home to respond to Patricia Swartz's email. She indicated in her email my answers came in the mail that day, November 30, 2022, which was



an impossibility, since, I just mailed the second set, prior to responding to her.

**(Exhibit L)**

42. On December 1, 2021, I filed a letter with the Delaware Supreme Court regarding Patricia Swartz's conspiracy to commit fraud to throw my case out, by denying service after the deadline. **(Exhibit L)**

43. On Fri., Dec. 10, 2021, the Board signed a notice of a hearing. I was not provided proper notice on Dec.10, 2021. The Board did not send notice to me until **December 24, 2021**, 18 days before trial in violation of the 20-day requirement under the Del. Law. R. of Disciplinary Proc. R. 9(d)(2). (Emphasis intended)

44. On Mon., Dec. 13, 2021, the Delaware Supreme Court appointed counsel, despite having notice of my objection to counsel, which caused me great emotional distress.

45. On Thur., Dec.16, 2021, I received the Court Order regarding the appointment, by US Mail.

46. On Fri., Dec. 17, 2021, counsel contacted me. I immediately indicated my objection to his appointment.

47. On Sat., Dec. 18, 2021, I filed the attached letter with the Board, objecting to absence of service of notice of the hearing, notice that I intended to file a motion with the Delaware Supreme Court on Monday, and a request to

suspend a hearing until after I am afforded an opportunity to perform discovery, and after a determination on counsel is made, including appeals to safeguard my 6<sup>th</sup> Amendment right to self-representation. **(Exhibit M)**

48. On Mon., Dec. 20, 2021, I filed *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021*, with the Delaware Supreme Court, with a copy to Petitioner, and the Board, albeit the Board's copy was mailed Dec.21, 2021. **(Exhibit N)**

49. On Dec. 21, 2021, I mailed a letter to the Court rejecting appointment of counsel. **(Exhibit O)**

50. On December 21, 2021, appointed counsel contacted me by E-mail, and I declined his representation.

51. On December 22, 2021 appointed Counsel contacted me again, and I fired him, while copying others, via email, for my safety in defending the exercise of my Constitutionally protected activity.

52. Appointed Counsel moved to terminate his appointment on Dec. 23, 2021.

53. On December 24, 2021, I received the Notice of the hearing by US Mail, prior to the time permitted to represent myself, and merely 18 days before

the hearing, date January 13, 2022, in violation of Pursuant to Delaware Rules of Disciplinary Procedure Rule 9 (d)(3) requiring notice “at least 20 days in advance.”

54. I objected to insufficient notice, and at no time waived such objections. I was not afforded an opportunity to gather, present evidence or cross examine witnesses. I merely received 18 days notice. I was not given a fair time or opportunity to perform discovery and prepare my defense in this rushed proceeding to persecute me for my faith in Jesus Christ, and for bringing petitions to address grievances.

55. On December 28, 2021, I used the law library phone, since I did not have a phone at the time, due to poverty. I called the Administrator, Karlis Johnson, at the Disciplinary Board, twice, to confirm receipt of my motion, dated December 18, 2021, to suspend the hearing due to lack of notice, and need for time to determine whether I may represent myself, and time to prepare including time to perform discovery. The Administrator did not pick up, despite my message and trying a second time. (**Exhibit P, internal exhibit L**)

56. On Dec. 29, 2021, I sent a letter with exhibits with both the Delaware Supreme Court and the Board notifying them,

“The hearing is two weeks away, no determination has been made by the Court on my exercise of self-representation under the 6th amendment, and on religious grounds, and on my request to postpone the hearing so I may perform

discovery to adequately defend my exercise of Constitutionally protected activity which is the subject of this petition, per the state's admission." (Emphasis Intended), (**Exhibit P**, and Exhibits thereto). I also objected to insufficient notice, and at no time waived my Due Process Right to proper notice, 20 days in advance of any hearing.

57. On December 30, 2021, the Court excused appointed counsel, with about two weeks before the hearing date. (**Exhibit P-2, attached order**)

58. On December 31, 2021, I mailed a *Respondent's motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs*; Memorandum of law in support of this motion, table of contents of the exhibits, and exhibits thereto contained, dated December 31, 2021. (**Exhibit Q**, Motion, with a table of Contents for exhibits 1-10 thereto, but only attaching exhibits 4, affidavit of religious belief, and exhibits 9 and 10, horrific healthcare stories in the local newspaper).

59. Petitioner and the Court knew appointment of counsel violated my religious beliefs. The Board failed to provide proper notice of a hearing, and did not respond to my requests for an extension of time to grant me an opportunity to prepare.

60. I was so emotionally distressed by the State's denial of an opportunity to be heard on my motion, dated December 18, 2021, wrongful appointment of counsel, lack of a fair opportunity to research, prepare, perform discovery and subpoena witnesses, cross examine my accuser(s) in violation of the 6<sup>th</sup> Amendment, and the state's unreasonable disparate treatment towards me to impede an opportunity for a fair hearing, based on the state's disdain for my religious beliefs, calling my faith in Jesus a disability, that I developed what I believe was shingles and fell ill. I alerted the Petitioner and the Board. I was very sick, and vultures started attacking me as if I was already dead. I alerted the Board and the ODC that I contacted the state and federal agencies to assist me with the vulture problems too. (See, Exhibit S, and internal Exhibit E shows pictures of the vultures). The Federal government assisted me by hanging an effigy on a tree. I alerted opposing counsel of these intervening interfering circumstances. (See Exhibit GG, and see communications with federal agent and the federal permit for the effigy)

61. I alerted the state to my sickness, and the pest situation, the first week of January, 2021. I took covid tests which were negative, and thought I was having an allergic reaction which is very serious for me. I was probably worn out by the shingles. I oppose organized healthcare, as I believe people who blindly

trust in experts disobey God. So, I did not get a doctor's opinion. See, *Psalm* 146:3, *Psalm* 118:8-9, *Isaiah* 2:22, *Jeremiah* 17:5.

62. On Thur., Jan. 6, 2022, I E-mailed the Board and Patricia Swartz to check on the status of my request to delay the hearing in order to be afforded a fair opportunity to perform discovery to gather evidence to show the Board it does not have subject matter jurisdiction. (**Exhibit R**, E-mail contained in Exhibit B)

63. The Board did not respond to my Jan. 6, status update request on my motion relating to insufficient notice and motion for time to prepare a defense by suspending the hearing until discovery was closed.

64. So, on Monday, January 10, 2022, I followed up on my outstanding letter motion requesting the Board postpone the hearing, objected to improper service of the December 10, 2021 notice, and objected based on the fact I do not have a full and fair opportunity to prepare and conduct discovery for my defense via E-mail. (**Exhibit R**, E-mail contained in Exhibit B)

65. On January 10, 2022, the Board responded, "the hearing was on," in a form I could not appeal, via unsigned email, depriving me of the opportunity to be heard on appeal, despite informally, knowing I required additional time to prepare to defend my exercise of fundamental rights, knowing I was sick, and desired time to take care of the vultures, and ignoring the formal motions dated December 18, 2022, and December 31, 2022, regarding more important reasons to suspend the

hearing, I needed opportunity to perform discovery, research and prepare. (**Exhibit R-1**)

66. On January 11, 2022, I filed a Motion *Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against me to prevent manifest injustice to afford me an opportunity to perform discovery, for opportunity to call witnesses and prepare a defense for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs*, incorporated herein by reference. (**Exhibit R**)

67. On January 11, 2022, The Delaware Supreme Court swiftly granted an order denying relief based on jurisdiction, rightly so as the Board evaded review by avoiding rendering a formal order by its E-mail decision to evade review in violation of my Due Process right to be heard, which forced the Board to render a subsequent order, as they provided no orders for any of my other outstanding motions. However, the Delaware Supreme Court wrongly sought, in collusion with the State, to appeal before it was too late to prevent unconstitutional violations depriving me of a fair opportunity to defend my exercise of fundamental rights, denying me an opportunity to prepare, perform discovery, cross examine

witnesses, or subpoena witnesses, by permitting a partial, unfair, fixed hearing to persecute me based on my faith in Jesus Christ, in violation of the procedural and substantive due process clause, and the Equal Protections Clause applicable to the State pursuant to the 14<sup>th</sup> Amendment, and in violation of the First Amendment applicable to the state pursuant to the 14<sup>th</sup> Amendment.

68. The Delaware Supreme Court order provided:

“Upon careful consideration of the emergency objections and emergency motion to postpone the hearing (“the Motion”) filed by Respondent in this Court, the Motion is denied. Respondent is the subject of an ongoing proceeding in the Board on Professional Responsibility. The hearing panel chair assigned to Respondent’s matter decides “scheduling, administrative, procedural, and evidentiary matters.

The decisions of the panel chair or panel **may not be appealed before submission of the panel’s final report and recommendation to this Court.** When the panel submits its final report and recommendation to the Court or review, Respondent will have the opportunity to object to the report and recommendations **as well as prior rulings of the panel chair.** IT IS SO ORDERED.” (Emphasis is intended see, **Exhibit R-2**, the Order).

69. The opportunity for review “after the submission of the panel’s final report” is too late to prevent unconstitutional violations by the Board and the ODC, by allowing them, and ruling after irreparable injury took place. *Id.* Therefore, the Delaware Supreme Court permitted the Constitutional injury.

70. The Court in the footnotes of the order concerningly held:

“1 Respondent also filed the Motion in the Board on Professional Responsibility. 2 Del. Lawyers’ R. Disciplinary Proc. 2(c). Procedures and hearings for proceedings to determine incapacity are conducted in the same manner as disciplinary proceedings. *Id.* 19(c). 3. *Id.* 9(e); 19(c)” *Id.*



71. The Court appeared to assume my faith in Jesus Christ is a mental disability by referring to other proceedings to deem them to be.

72. On January 11, 2022, the Board granted an order postponing the hearing for eight days due to alleged illness, a reason not included in my motion. The Board knew I had shingles, a week before, but did not care about my health in their email response on January 10, 2022, indicating the hearing is on, with no formal orders on my prior motions.

73. The Board ignored, and did not afford me an opportunity to be heard on past motions, including motions dated December 17, and December 31, 2020, in violation of the substantive and procedural due process clause, and in violation of the equal protections clause as applied to me, by treating me disparately based on religious beliefs, in contravention to the norms of a fair proceeding.

74. On January 12, 2022, I wasted no time and appealed the Board's Order, immediately, under great distress at the violation of my fair opportunity to prepare, in a motion, called *Respondent's Motion appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in my motion to grant postponement to afford me opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend my exercise*

*of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense is granted, and moved the court to suspend a hearing date until the parties and the Board determine a fair opportunity to perform discovery has been allowed so as not to violate the norms of a fair proceeding, displaying disparate treatment towards respondent based on my unique religious political beliefs, in violation of the Equal Protections clause applicable to me as a party of one. Admittedly, there are some typos, in numbering. (Exhibit S, with Exhibits A -M).*

75. The next day, January 13, 2022, I filed a motion for an emergency immediate decision on my January 12, 2022 appeal, called [Respondent's] *Emergency Motion for Immediate Relief requesting review of Respondent's Motion Appealing Order of the Board of Professional Responsibility of the Supreme Court of the State of Delaware, Dated January 11, 2022, Granting Postponement of the Hearing for 8 days due to illness, not a reason identified in my motion to Grant postponement to afford me an opportunity to Prepare a defense, perform discovery, research, file motions, be heard on outstanding Motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and the*

*hearing date should be postponed until after a fair opportunity to build a defense is given, dated January 13, 2022. (Exhibit T)*

76. The same day, January 13, 2022, the State brought an answer to a motion rendered moot, by the January 11, 2022 Board's Order, to harass and distract me, knowing I argued I did not have enough time to prepare and present a defense, with no opportunity for discovery or to call witnesses.

77. The day after that, Saturday, January 15, 2022, I served a different motion with the Board to call specific witnesses, requesting subpoenas, and additional time to send requests for admissions and interrogatories to Defense Counsel, which were necessary for my defenses to this case, the illegality of the proceeding as applied, motivated by the state's desire to punish me for my exercise of protected conduct in contravention to the 1st Amendment applicable to the State pursuant to the 14th Amendment, and in violation of the Equal Protections Clause by disparate treatment towards me based on my religious beliefs and poverty, deeming me unworthy to be heard and unworthy of other Constitutional rights. The Motion is called *Respondent's more particularized Motion to suspend hearing to allow opportunity for her to research and prepare a defense, and request for opportunity to draft requests for admission, interrogatories and subpoena opposing counsel as witness, as a necessary witnesses to her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice*

*Collins J. Seitz, Judge Kenneth S. Clark, due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show Unconstitutional motive for the petition, to allow the accused, the Respondent an opportunity to defend herself on the defense of illegality of proceeding, as applied to her, motivated by disdain for her religious beliefs, associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against Respondent. (Exhibit U, all exhibits are incorporated herein by reference)*

78. On Tuesday, January 18, 2022, I followed up with the Board and ODC via Email, and asked "Please let me know the status of my [January 15, 2022] request to call witnesses, for subpoenas, time to perform discovery, and a suspension of the hearing date." (Exhibit U-2)

79. The Board made its decision by E-mail, in an unappealable form:

"Ms. Kelly, please see the Board's response below:

Unless this motion for continuance to allow discovery is unopposed by the ODC, the Board denies the motion for a continuance. The Board has at all times denied Respondent's request for a continuance based on discovery issues due to the Respondent's lack of discovery motions. One continuance was granted due to an illness alleged by Respondent of shingles. Respondent now makes a motion seeking time to subpoena ODC Lawyers and Judicial Officers as well as serve discovery on the ODC. The persons identified in Respondent's motion were known to Respondent at the time of

her initial filing. Respondent has not discovered new information causing a need for a delay to conduct discovery. Thus, the Board denies this motion for a continuance.” (**Exhibit U-2**)

80. January 18, 2022 was the first time, I heard of the Board’s assertion for denying my request, allegedly, “due to the Respondent’s lack of discovery motions.” The first informal decision denying a suspension of hearing date, was on January 10, 2022, which did not assert this reason. (**Exhibit R-1**). I merely had two days prior to the hearing. The January 15, 2022 motion filed with the Board identified specific requests for discovery. (**Exhibit U**) The Board acted unfairly, with intent to fraudulently mislead the courts on appeal, on its two decisions January 10 and January 18,<sup>th</sup> made in non-appealable form.

81. I responded by E-mail requesting the Board send me a formal order to appeal, which was ignored to deny me the opportunity to be heard on appeal to the Delaware Supreme Court, and the Us Supreme Court.” (**Exhibit U-2**)

82. After the weekend, two business days after my appeal, on Tuesday, January 18, 2022, the Delaware Supreme Court denied my appeal, which was based on protecting my fundamental rights. (**Exhibit V**, attached Order, dated January 18, 2022).

83. The Court’s January 18, 2022 order provides:

“Upon careful consideration of the motion appealing the order of the Board on Professional Responsibility dated January 11, 2022 (“the Motion”) filed by Respondent in this Court,<sup>1</sup> the Motion is denied for the reasons

stated in this Court's January 11, 2022 Order. The Court **will not rule on any further frivolous motions or appeals** that Respondent files in this matter before the panel submits its final report and recommendation for the Court's review. IT IS SO ORDERED." Id. (Emphasis Intended).

84. The Delaware Supreme Court deprived me of an opportunity to be heard on appeal until it was too late, and violations of my right to a fair hearing already took place. Thereby the Court appeared to condone and collude with the irreparable injury against me by the state, by allowing the denial of a fair opportunity for me to prepare and defend my case. The Court also appeared to deem my defenses frivolous by deeming a fair opportunity to prepare and present them as frivolous, in violation of my substantive and procedural due process clause right to a fair opportunity to be heard, and in violation of the Equal protections Clause by denying me equal access to a fair proceeding to present my defense. (Exhibit V).

85. The State Court indicated it would not hear any frivolous motions, giving a colluding sign to the Board not to file an official order, to prevent my opportunity to be heard on appeal. The Board denied me the right to prepare a defense, to subpoena witnesses, cross examine necessary witnesses, and a fair opportunity to be heard, based on disdain towards my religious beliefs. The state proceeding was not a lawful proceeding. This is my hanging but for my belief in Jesus the Christ.

86. On January 20, 2022, I was not feeling well and I sent the Board and the ODC an E-mail indicating I was cancelling the hearing because I did not feel well, and was not afforded an opportunity to prepare in violation of my substantive and procedural due process rights. (**Exhibit EE**, Number 47, Exhibits to hearing)

87. I could not sleep at all by the lawlessness of the state, and did not want to waive my right to plead insufficiency of service of service of the Notice of a hearing. So, the next morning, on January 21, 2022, I attended the hearing by phone, a phone my mother sent to me as a gift for my birthdate in the nick of time, since zoom was not working on my computer.

88. On January 22, 2022, I E-mailed the Board, while copying the ODC, per the Board's request, Respondent Meghan M. Kelly's Exhibits to Hearing she made a special appearance to attend reserving her objections to dismiss based on lack of subject matter jurisdiction due to the Court members' participation in inciting the unlawful petition and lack of subject matter jurisdiction due to illegality as applied.

89. On January 23, 2022, I filed *Respondent Meghan M. Kelly Amended Exhibits to Hearing she made a special appearance to attend reserving her objections to dismiss based on lack of subject matter jurisdiction due to the Court's members participation in inciting the unlawful petition and lack of subject matter jurisdiction due to illegality as applied, to include emails to the Office of*

*Disciplinary Counsel*, to include two additional exhibits, the January 20, 2022 E-mail relating to cancelling the hearing, and one dated October 26, 2021, to show my intent to perform discovery or call Chief Justice Collins Seitz as a witness. (**Exhibit Y**, Internal exhibits referred as R-Ex).

90. On January 25, 2022, I filed Respondent's Motion to Dismiss Due to lack of Adequate Notice, I incorporate herein by reference, as **Exhibit W**.

91. On January 31, 2022, the Board sent an E-mail copy of the transcript of the hearing, included in its entirety as **Exhibit Z**.

92. On January 31, 2022, I E-mailed Patricia Swartz requesting her exhibits. She forwarded them unmarked, and undistinguishable emails, except one, ODC's Exhibit Number 5, which was over 600 pages, which expended my resources to print out. Patricia Swartz sent a corrected copy of her exhibit list. I did not receive her first list prior to the hearing. (**Exhibit AA**)

93. On February 1, 2022, I objected to the form Patricia Swartz presented the documents on February 1, 2022, before the Board. (**Exhibit AA**).

94. At a quick glance of the transcript, I was horrified by the errors in the transcript, and sent an email to the Board and ODC regarding correcting the transcript. I missed the error where I requested Patricia Swartz be called as a witness. My request to call Patricia Swartz was left out of the transcript, and is rather a large error. David White and Patricia Swartz attended the hearing, and may



be called as witnesses to confirm I asked to call Patricia Swartz as a witness at the inception of the tele-hearing. (See **Exhibit BB**)

95. On February 1, 2022, I filed corrections to the transcript which are incorporated to every reference to the Transcript, which does not correct all inaccuracies. (**Exhibit CC**)

96. On February 18, 2022, the Board sent the *Report and Recommendation on Petition to Transfer to Disability Inactive Status* to the ODC and I by E-mail, with a paper copy received by me on February 24, 2022. (**Exhibit DD “Report”**).

97. The Board recommended placing me on “disabled inactive attorney status until a qualified mental health expert can certify (my) fitness to practice law,” but for my exercise of the right to petition the courts to address a grievance against my person, and constitutionally protected activity, based on my poverty, my religious beliefs, political affiliation, speech and association. *Id.*

98. On February 28, 2022, I filed the attached Respondent’s Unopposed Motion under Rule 15 (b) for a Ten-Day Extension to file objection for a variety of reasons that obstructed my ability to work on objections, including but not limited to computer technical problems, internet outages, wild life police coming to my door demanding federal papers for the vulture effigy, loved ones’ sickness and deaths, more deaths of loved ones occurred after this request, and the inability to

get into the law library without my replacement attorney card, I requested long ago. (**Exhibit GG**).

99. On March 1, 2022, The Court rendered an order on my Motion for an extension, dated February 28, 2022 and held.

“Having considered the Respondent’s Unopposed Motion under Rule 15(b) for a Ten-Day Extension to File Objections, the Motion is GRANTED. Objections are due by March 21, 2022. **No further extensions will be granted.**” (**Exhibit HH**).

100. During the first week of March, 2022, I discovered the law librarian was out due to the shingles. Having had the shingles before, I knew it probably was wearing her out, and may prevent her from coming in. The Delaware Supreme Court’s Sussex County locations requires pro se litigants to drop their Delaware Supreme court documents with the law library. Whereas they allow lawyers to drop off their documents at the Sussex Court-house location. The Court is treating me as a pro-se party, not as an attorney. So, I am required to conform to pro se filing rules. I asked the law librarians in Upper Delaware for help. Since I was unable to scan in documents at Del Tech, at the time, which eliminated my ability to file electronically, and the increase in gas made it unaffordable to drive to other Court locations. Filing alternatives and help was not granted.

101. On March 3, 2022, I sent a letter Motion, and proposed order to the Court, requesting permission to drop off my documents to the Sussex County,

Delaware Supreme Court location, should the law librarian be out on May 21, 2022 before 4:30 PM, when the Court closes. (Exhibit II).

102. On March 8, 2022, the Court granted me contingent permission to drop off documents at the Delaware Supreme Court, should the law librarian be unavailable. (Exhibit JJ).

**Establishment of Government Religion; Planned Economic Crash, my hope the Courts will save us by guiding the misguided other two branches to coin money to care, instead of coin to control, before the government loses control of governing power and lawlessness occurs, The State finds my religious, political beliefs and petitions repugnant, this explains some political-religious beliefs, which are in issue to prove discriminatory purpose**

The State alleges it brought this petition because it reviewed my pleadings in the Chancery and Supreme Court relating to my law suit against President Donald J. Trump to dissolve the establishment of Government religion, to alleviate a government incited substantial burden upon my free exercise of religious beliefs, in September of 2020. The state disagrees with my religious and political beliefs and petitions. (Ans 5).

Prior to filing the case, someone talked about shooting me for my stickers on my vehicle, which show my religious-political beliefs, and others have accused me of not being a Christian since I am a democrat and do not support President

Trump's established government religious beliefs. (Transcript 113, 132). I sought relief in the courts to protect my person from physical, social and economic government incited attacks.

The scary remark by a stranger about shooting me, for political-religious beliefs, is one valid reason I went to the Courts for protection. People in our nation have been brutally murdered based on religious and political beliefs during former President Trump's presidency. I did not want to die based on the President's incitement to persecute those who appeared disloyal to Trump-religion.

I was also reasonably upset because of social attacks against me as a non-Christian because my political-religious positions were not conformed to Trump-religion. My religion requires guiding others to the way to heaven through rebuking them through the Word, to save them being thrown into the fires of hell. We are commanded to tell people to repent and be saved. (*2 Corinthians* 7:10, "Godly sorrow brings repentance that leads to salvation and leaves no regret, but worldly sorrow brings death," meaning loss of eternal life the last day."); (*Luke* 13:5, "I tell you, no! But unless you repent, you too will all perish."); (*Luke*, 17:3 "If your brother or sister sins against you, rebuke them; and if they repent, forgive them."); (*Mark* 6:12, "They went out and preached that people should repent."); (*Matthew* 4:17, "From that time on Jesus began to preach, 'Repent, for the kingdom of heaven is near.'"); *Matthew* 3:2, *Mark* 16:15.

If others see me as antichristian, they will not receive guidance through the Word, and sadly may be led astray to loss of eternal life.

I filed *Kelly v Trump* in the Chancery, No. 2020-0809, Delaware Supreme Court, No. 119-2021, and the United States Supreme Court, No. 21-5522, to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Donald J. Trump and current President Joseph R. Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoinderment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or. No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders").

These executive orders allow money or support to be transferred between government agents and religious organizations. I believe the money or support, in the bought or bartered for, not free union of church and state, is one reason why religious-political attacks seemed to have increased in recent years, including

government incited religious-political attacks against me. President Biden's Valentine's Day executive Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to be bestowed to religious organizations, like churches in other countries, to perform government business under the guise of charity.

I am logically emotionally distressed by the unholy union of church and state because I do not want people to be misled to harm others or themselves. I am a Christian. I believe people go to hell for teaching business is charity, which is what the executive orders teach. Jesus teaches you cannot serve God and money. *Matthew 6:24*. Jesus teaches people who perform business as worship are not welcome in heaven. *John 2:16*.

I also believe people are misled to hell by government, through government backed partnerships for teaching organized charity, pro bono, volunteering and fundraising is charity too. In *Matthew 6:1-4*, Jesus commands us when we give charity to do it in secret, without recognition or reward, not knowing our left hand from our right. Giving out of one hand to get out of the other is business, not charity, good or love. Those who teach business is charity or good mislead people to believe seeking money and material gain is charitable love, driving out unconditional love from the hearts of man replaced with the love of money. Jesus teaches if you violate this command by organized charity, you will have "no

reward from God,” meaning no eternal life. *Matthew* 6:1. I believe it is a big sin to participate in conditional collective charity, or fundraising, which is not based on unconditional love, but conditionally conformed caring. I believe people do evil by organized charity by exploiting the needy to serve the greedy, by tax breaks, marketing or other wicked design.

I believe many things the government teaches leads to hell, and seek to safeguard the First Amendment prohibition against the establishment of government religion, in order to prevent more people from being misled to hell under the guise of heaven, and to protect my exercise of personal religious beliefs without government incited private persecution. I sought damages for emotional relief in *Kelly v Trump*. I am reasonably foreseeably emotionally distressed because I believe more people I love are harmed and will lose eternal life by the establishment of government religion. The government does not have to adopt my religious beliefs to understand the connection to harm to me, infliction of emotional distress, because I am reasonably sad, and government incited chilling of my religious exercise of beliefs. It is my religious belief others will be harmed and misled to hell, by temptations the establishment of government religious beliefs create for conformed government-religious beliefs and exercise. The establishment of government religion reasonably and foreseeably causes, but for emotional distress to me. I do not have to prove God’s words are true to the Court.

The Court must merely determine my faith, my religious belief, if genuine would cause emotional harm to me.

The First Amendment requires this Court protect the constitutional independent freedom of conscience, from substantial government burden.

It is against my religious exercise and belief to submit to evaluations by mental health professionals. I have “the mind of Christ,” not the mind of the world, the mind of the antichrist. 1 *Corinthians* 2:16. I do not think like those trained in mental health professions. I believe their professional thinking and their training leads to thinking that damns people to hell.

It is my religious belief mental health workers, psychologists, behavioralists, counselors, psychiatrists teach people to go to hell by focusing on worldly desires, not the desires of God. I believe people go to hell for carelessly referring people to businesses to seek alleged mental health care because they do not believe like they do.

Psychology is so evil, the study of the mind, assuming man may be controlled physically, by chemicals, socially conditionally conformed caring, not love, through wicked behavioralist theories, or by enticement through physical desires temptations, of reward and avoidance of harm, and conditional relationships.



The mind of Christ, those with God as their Guide, unconditionally love God freely, not by forced, scientifically conditioned choice. I am a born-again follower of Jesus Christ. I am not the same as the world. I am not controlled by the world. God teaches the world is controlled by the devil, and every person in it who does not lay down man's desires for God's is controlled by the devil. The devil controls people by enticing them to reflect his image, the image of the antichrist, by living based on worldly desires and worldly needs, not laying down their desires, to use their conscience mind to do God's desires, aka God's will, based on faith in his Word accessible through the father, son and the holy spirit, the holy spirit leading individuals in the Bible, and the Holy spirit leading born-again followers of Jesus. Love is a choice, not a feeling. Jesus did not feel like dying on the cross, and even asked God to take away that burden, but Jesus said let God's will be done, he died out of love for God. *Citing, Matthew 26:39*. I choose to love God, even when I do not feel like it, out of love. God comforts me by teaching me not to "not be afraid of those who kill the body but cannot kill the soul. Rather, be afraid of the One who can destroy both soul and body in hell." *Matthew 10:28*. I fear and love God.

I believe many things the government teaches through government agents are antichrist, and believe keeping religion separate decreases the temptations that mislead people to hell under the guise of good or heaven. Children are taught in schools to disobey Jesus by conditionally conformed traditions and celebrations,

holidays, professional days, and spirit weeks which teach conditionally conformed behavior is unconditional love, when it is societal compelled conduct not unconditional love, but scientifically conditioning folks to bend their will to the will of the world. So much time is spent in schools on holidays instead of critical thinking. Children learn the lie conditional conformed caring based on date is unconditional love.

I also believe children are taught to adopt antichrist thinking by the government and businesses who sell them things through wicked temptations and enticements of their desires to bend their now substantially burdened will to sin by greed, gluttony, and lustful good times, under the guise of love or good.

I am reasonably alarmed, and emotionally distraught, and even developed the shingles, but for the State's conduct in persecuting me for my faith in Jesus. My emotional distress is not evidence of mental disability. Instead, it is evidence that I have a heart of flesh, not of stone. (See, *Ezekiel 36:26*, "I will give you a new heart and put a new spirit in you; I will remove from you your heart of stone and give you a heart of flesh."). My distress is evidence I am a child of God, not a child of the world. I care about God and seek to worship God by the dictates of my conscience without government persecution. It is my religious belief, children of the world, a.k.a. the natural man, a.k.a. children of the devil, are calm cool and collected because they do not care to love. (See, *1 John 3:10*, *John 8:44*, regarding

children of the devil, *Matthew* Chapter 13, regarding children of the evil one, See 1 *Corinthians* Chapter two to discern the natural man not born of God by the holy spirit from the spiritual man. They are not saddened by sin, their own sins, or others. The holy spirit does not convict them of righteousness. They are without God as their guide. See *Wisdom* Chapter 2 to see examples of how those without God as their guide think.

It is against my religious exercise and belief to submit to evaluations by mental health professionals. I have “the mind of Christ,” not the mind of the world, the mind of the antichrist. 1 *Corinthians* 2:16. I do not think like those trained in mental health professions. I believe their professional thinking and their training leads to thinking that damns people to hell.

I do not think the same way as many people. Jesus teaches most people go to hell. *Matthew* 7:13-15, *Luke* 13:23-28, *Isaiah* 10:22. I believe Jesus, and keep myself separate, holy, by not sinning just because the world praises evil as good and good as evil. *Hebrews* 12:14, *Leviticus* 11:45. God commands us, “Do not conform to the pattern of this world, but be transformed by the renewing of your mind. Then you will be able to test and approve what God’s will is his good, pleasing and perfect will.” *Romans* 12:2.

I believe children are taught to go to hell young, to reflect the image of the devil young, by living based on their desires and the desires of others, instead of

laying down worldly desires, to do God's will by love for God and love for one another as we love ourselves. (*Matthew 22:36-39*, with regards to love God and one another, See *Isaiah 14:12-13*, to see how Lucifer wanted to do what he wanted to do, not lay down his desires for God's desires, a.k.a. God's will. Lucifer wanted to be his own God.)

I believe we were all taught as children, through psychological teachings, to disobey God, to go the way to hell, to give into temptations, to follow our dreams, wants, and heart, instead of laying down our desires to think, to know, in order to love, which is God's will to overcome sins, lusts. We were all taught to give into temptations of our desires, to be controlled by our desires, and to be controlled by those who entice our desires, leading to harm and certain damnation in hell, instead of being free in Christ to use our conscience minds to freely choose to do God's desires instead of our own and the desires of mere people.

I believe the founders of the Constitution made us less free by including "the pursuit of happiness" in the Declaration of Independence, (Jefferson, Thomas, 1776). So, those who entice people's desires for happiness, may control and rule over those not free in Christ, by temptations of potential praise or profit and avoidance of harm, societal shame, ridicule or punishments to bend their substantially burdened will.

I believe children are taught young to celebrate holidays, including but not limited to birth dates, Christmas, Easter, Halloween and Valentine's Day, based on pagan religious worship, which teach them conditionally caring is unconditional love, driving out love from their hearts replaced with the mark of the beast, the antichrist, absence of unconditional love, leading to thinking that damns people to hell. I also believe the spirit weeks, which are common in middle and high school, teach them to accept the antichrist spirit in their minds as if written on the foreheads, and on their hands by how they live, by teaching them conditional conformed doing is unconditional love. There is so much evil. I keep myself separate from. I see mascots and flags act as symbols of worship, reflecting the religious traditions of ancient city states, which I believe is adultery with God by making the government, or country, our God head through a symbols or people.

I believe it is sin to blindly trust in man, including experts, and that injustice is guaranteed when judges delegate their judgment to another, instead of obeying God by using their own conscience mind, their brain, to choose to think, in order to know, in order to love, protecting even those they are correcting.<sup>3</sup> Jesus teaches us call no one your teacher but God. *Matthew 23:8-10*. I believe people are misled to harm and hell for trusting in professionals or experts as guides, as God, in place of

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<sup>3</sup> *Micah 7:5*, ("Do not trust a neighbor; put no confidence in a friend. Even with the woman who lies in your embrace guard the words of your lips.")

using their own independent critical thinking to obey God's will love to overcome temptations and misleading enticements of lusts and desires.

I believe people go to hell for pride, and for making science, the study of things through observing experiments, the master or guide of their life, instead of recognizing science is the mere study of God's creation. Once a student declares himself an authority, an expert, a God as guide in a field, I believe he should not be trusted as science is defeated when the pupil ends learning by sinful, satanic declaration of his authority based merely on observation of studies with known and unknown variables, including time. With humility there is grace, but only condemnation for the proud should they not repent.

I believe people go to hell for looking at other people for what other people can contribute to the community, country or others, which is the evil eye, the mind of the antichrist, or showing the antichrist spirit, instead of looking at people with clear eyes of unconditional love. People are God's. People are not property of the community, country or others to be exchanged for money and material gain. I believe government servants who look at people to control instead of care for, and correct, while safeguarding freedom of conscience, reflect the image of the devil by making their will be done, making themselves their own God like Satan seeks per *Isaiah*, Chapter 14. Government servants and workers should safeguard the free will of people from substantial social, economic or physical burdens, alleviate

the burdens off the people, not exploit the people by increasing desperate conditions or telling the people to sacrifice to serve the leaders who behave like wolves eating the sheep they are charged to shepherd. <sup>4</sup>

The bible teaches most people will lose eternal life in hell, at the resurrection of the dead for judgment. *Matthew 7:13-15, Luke 13:23-28, Isaiah 10:22*. I believe one reason why is that governments, including our own mislead people to hell by seeking to control people by money through grants, wicked fundraising, and artificial debt, essentially tempting the people to make money God and guide. Money does not rule a free people. Those free in Christ, are not controlled by money, but control their desires to love God.

Recall Jesus the Christ teaches you cannot serve God and money. Woe to those who make money their God or guide. I believe there is greater condemnation in hell for leaders who mislead those they are charged to care for, not control, through laws that focus on the love of money, which makes money savior in place of God, and guides those they serve to hell by driving out their love for one another, for the love of money and material gain.

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<sup>4</sup> *Ezekiel 34:2-5*, "Son of man, prophesy against the shepherds of Israel. Prophesy and tell them that this is what the Lord GOD says: 'Woe to the shepherds of Israel, who only feed themselves! Should not the shepherds feed their flock? You eat the fat, wear the wool, and butcher the fattened sheep, but you do not feed the flock You have not strengthened the weak, healed the sick, bound up the injured, brought back the strays, or searched for the lost. Instead, you have ruled them with violence and cruelty. They were scattered for lack of a shepherd, and when they were scattered, they became food for all the wild beasts.'"

I believe the reason why most people go to hell is by the way money is coined, to control people. Money should be coined without debt and interest by the government to care for people, while safeguarding their people's exercise of free will without government backed substantial social, economic or physical burdens.

The way money is currently coined, through the government's delegation of its Article 1 Section 8 coining power to the Federal Reserve, a private entity, like other Central Banks such the Bank of England, substantially burdens people's exercise of liberties by economic pressure, making them less free, in violation of the 13th Amendment, by requiring involuntary forced servitude to pay back artificial unearned indebtedness, and interest on debt. Money is wrongly made out of nothingness, to make debt, to own a no longer free government or a free people. Interest is charged by the banks on the debt, not profiting the government or the people.

The more debt, the worse off the people, governments, and private entities, the more control those who coin money out of thin air have over governments, private entities and people. The government must take control of money, by coining money to care for the people, not be controlled and seek to control its people by money.



President Lincoln passed an executive order to care for people, unearned, required by printing out fiat money, greenbacks without debt or interest to care for the people. See, Act of Feb. 25, 1862, ch. 33 § 1, 12 stat. 345.28. President Kennedy also signed an executive order to coin money correctly to care for the people, without debt and interest, but he was murdered and it was never enforced. See, FR 5605, Exec. Order No. 11110. President Lincoln's greenbacks were held Constitutional by the US Supreme Court. In *Knox v Lee*, 79 U.S. 457 (1871), the U.S. Supreme Court held that the Legal Tender Act, which authorized the printing of paper money not redeemable in gold or silver, did not violate the U.S. Constitution.

I hope the Attorney General's seek a writ of mandamus against President Biden to require he order Secretary of Treasury Janet Yellen to coin money to pay back debt to reverse or prevent a planned economic crash until a long-term solution may be devised to protect the liberties of the people.

Pursuant to 31 U.S.C. § 5112 (k), "The Secretary may mint and issue platinum bullion coins and proof platinum coins in accordance with such specifications, designs, varieties, quantities, denominations, and inscriptions as the Secretary, in the Secretary's discretion, may prescribe from time to time."

Janet Yellen has a conflict of interest since she used to be a Federal Reserve Officer. She even spoke at the BIS, the Bank of International Settlements. I

believe the Courts must guide misguided government servants to care for people, not exploit them for profit or debt control.

Without the Court governing and guiding the misguided legislative and executive branches, we will likely not reverse or prevent the planned elimination of fiat currency, and planned by design, economic crash, to get out of the biggest bill falling due, caring for the baby boomers.

The Bible requires forgiveness of debts. (See, *Deuteronomy*, 15:1, “At the end of every seven years you must cancel debts.”); (*Exodus* 21:2, “If you buy a [laborer’s work], a servant, he is to serve you for six years. But in the seventh year, he shall go free, without paying anything.”)<sup>5</sup> Charging interest on money lent leads to damnation in hell per God.

In Ezekiel 18:13, God teaches, “He lends at interest and takes a profit. Will such a man live [meaning eternal life]? He will not! Because he has done all these detestable things, he is to be put to death; his blood will be on his own head.”

Coining to pay off the debt of your people, without cost, based on unconditional love for your people who make this country great is good, just and merciful. The alternative of sacrificing the people is unjust.

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<sup>5</sup> See, *Genesis* 29:20-35, Showing Jacob working 7 years to marry the daughter of the man he worked for, with regards to Leah and Rebecca.

I believe it is sin for leaders to compel their people to pay back debt with interest or for government leaders to artificially increase the price of goods and services to reduce the use of resources. This substantially burdens the poor the most, while the rich may use unjust laws to declare tax write offs. So disparate treatment based on wealth is created arguably in violation of the Equal protections clause, without a rational basis based on sound reasoning. Money is not what innovates, free, not bought thought drives innovation with the freedom to criticize to help improvements, even the freedom to be wrong.

The Federal banks and to an extent smaller banks are empowered to make money out of nothingness, to create debt, and interest profit to control, not care for people. (See Exhibit K, Ans-Ex 18) Since the Federal reserve, and even smaller banks may make money out of nothingness, they do not have enough fiat currency should all depositors demand their money from banks. Hence, bank crashes occur because there is not enough money to pay back everyone who deposits money in banks in bank rushes, not because there is too much money in circulation.

I believe our only hope of the planned lawless elimination of the fiat currency and the planned economic crash is for the courts to compel the government to coin fiat currency without interest and debt, pay back all debts with fiat currency, and for the government to require banks to lend out their own fiat currency, at a profit or loss, instead of the Ponzi scheme of lending out what the

banks don't have at an unjust cost to innocent people. Inflation would not occur since bankers' greed will be limited by their own fiat currency at a loss or profit, with laws to prevent discrimination based on religion, gender, race, age, and place of origin.

It is against my religious belief to go into debt. God teaches "Owe nothing to anyone but to love them." *Romans 13:8.*<sup>6</sup>

Entities and individuals through the use of entities such as the BIS, World Bank, IMF, Central banks who are gifted the power to coin to control, seek to gain not merely profit, but control over the world by debt control.

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<sup>6</sup> I believe people will be thrown into the fires of hell for thinking giving someone a job is good or charity, should they not repent. God teaches it is not good or love, employers do no favor by giving someone a job. *Romans 4:4.* I believe it is satanic for the government or private entities to create busy jobs, like the pharaoh created busy work for the Israelites so they would not seek to worship God. *Exodus 5:7.* I believe leaders sin by creating jobs, by grants to not for profits or businesses, in a forced, not free market, and train the people to praise them. I believe people must use the independent conscience mind to be saved by hell, and adopted the force-fed thoughts of others misleads them into conditional conformed caring without unconditional love which is the way to eternal life. I believe people must use their brain, their conscience mind to go to heaven. I do not want busy workers. I want thinkers, who critically think for themselves, using their own free, not forced will, because I love people, and do not want them to go to hell. Our laws encourage made to break, repair and replace, polluting in productions products to create needless busy work. There are even more wicked proposals to force folks to work by making resources more expensive, laws that create made to disintegrate products, which cause pollution to replace alleged environmentally clean products, and policies to create a borrowing economy, where people do not own, they borrow things, in a borrowing economy. See Ans. Ex-19. These are unjust laws, that make people less free by economic force in a controlled, not free economy. Our law makers and presidents are blind and dumb, in the biblical sense, and need the courts to guide them, to prevent harm to the world, and possibly save their souls from hell for hardness of heads and hardness of hearts for cold hard and electronic cash. My religious belief, is justice in the courts is the command, and you are our hope of a hero. My beliefs are genuine.

The World Economic Forum Founder released a new book in 2022, by Klaus Schwab, and Thierry Malleret, *The Great Narrative for a better Future*, Forum Publishing, (“Book”), which alludes to banks controlling and governing the **governments**, private entities and individuals through money, requiring money by governments too. Since I believe controlling people by temptations of monetary loss or gain misleads them to hell by making money their guide and God, not love, not God, I respectfully and humbly request the Courts consider preventing the lawless, lustful reign by those who coin money for profit to control the world, the Central banks, and the Bank of International Settlements, the global money changer.

The book discusses the Central Banks controlling the world and governments as they wish, at the “central banker’s imagination,” not tamed by the just rule of law to prevent entities from killing, stealing and destroying people for material gain, under the guise of saving the world, just exploiting need to serve greed and gain. Page 87. Jesus teaches, “What profits a man to gain the whole world only to lose his eternal soul.” I do not believe in human sacrifice, as that serves the devil “who has power over death.” *Hebrews 2:14*.

On pages 86-87, the Book explains its plans for Central banks to behave as a pack of wolves for debt control over the world:

“The Network for Greening the Financial System and beyond: Imagining new Policies e Network for Greening the Financial System (NGFS) is a

group of **91 central banks and supervisors** committed to mobilizing mainstream finance to support the transition towards a **sustainable economy**. It is investigating many bold financial innovations that could (and most likely will) one day revolutionize the way in which climate-related risks are accounted for in **central banking and banking supervision**... The menu of options available [to central banks, the NGFS] is extensive and encompasses changes in all three most important policy fields of a central bank: **credit operations, collateral policies and asset purchases**. It is not the purpose of this book to delve into the technicalities of what this involves but, suffice to say, some of the options represent a radical departure from standard central bank operational policies. They are, in short, the product of central bankers' imagination."

The NGFS exploits and colludes with the G-7 Paris accord, which creates unjust laws, that give the appearance of helping the environment, but they exploit people, and profit off of the environment. God teaches the difference between unjust laws and just laws. There are just laws that could ease the burden off the backs of the people. The proposed ideas increase the burdens by making resources too expensive to use. So, people use less, or are forced into involuntary servitude, or possibly go without what they need. I ran for office on a platform to safeguard the environment, and have ideas based on just decrees, not wicked decrees like the G-7 and the UN's ideas which increase the burden on the backs of the common people, to tempt them to do their will, substantially burdening the people's free will.

Our leaders sin, by partiality, and mislead the country by partnerships at home and abroad. God teaches partiality blinds the eyes from seeing clearly to care for, not exploit, those leaders serve. I believe people go to hell for putting

their family first per Jesus, or for merely conditionally caring for those who care or affect them, with no unconditional love. See, *Matthew* 10:37, *Proverbs* 24:23-24. I believe sadly, many government leaders will go to hell if the Court or someone else does not correct him, to help them see clearly to care for the people. I believe people go to hell for blindly doing their job, like a heartless machine, without caring to know, caring to love others around them, just working for money, not for God. Our leaders should not behave as a pack of partnered wolves, selling their country, their resources and people, instead of caring for their country like shepherds tending sheep, keeping them safe from wolves. I hope the Court act like a good shepherd, with mercy, to save the country, by caring for their people, above their own position and profit.

In *Isaiah* 10:1, The Holy Spirit through the prophet Isaiah says, “Woe to those who enact unjust statutes and issue oppressive decrees, to deprive the poor of fair treatment and withhold justice from the oppressed of My people, to make widows their prey and orphans their plunder.”

When God says “Woe to those,” I sit up straight and think damned to hell are those should they not repent, which does not mean saying sorry, and making restitution. Judas did that and the bible indicates he is doomed to destruction, meaning loss of eternal life in the fire the last day. *John* 17:2, *Matthew* 27:4-5. It is a cleaning of our foreheads, minds, hands, our lives, and hearts of lusts driving out

unconditional love from our minds, hearts and lives. Not knowing, not caring to know, and misunderstanding and confusion are guilt without correction to God. I believe that Courts can save eternal lives from hell by teaching those who serve Satan by business greed to tame their desire in order to prevent their ignorance and lusts from killing, stealing and destroying human life and health for money, merriment or material gain. *Amos 5:15, Matthew 23:23.*

I believe some of the super wealthy with entity connections to Delaware, are artificially increasing the illusion of profits in entities. So, they may pay higher salaries, bonuses and pay outs, to later possibly write off, to prevent their selfish loss of unjust gains when the future planned, preventable economic down turn and schemed, wrongful elimination of the fiat dollar occurs.

I believe some of the super wealthy are hiding unjust gain in off shore accounts, which are not lost in economic down turns, depressions and crashes, like money may be lost in depositors' bank accounts.

Small banks can make money out of nothingness, to lend out at interest, unbacked by their own fiat currency. They essentially participate in a Ponzi scheme on a different extent than federal reserve, and central banks, by lending out what they don't have at interest profit, until the money is called due. In bank runs like in 1908, many depositors attempted to retrieve their money and found the vaults empty. I think small banks can lend out 90 times what the depositor's leave



in their accounts, essentially making money out of thin air, with the depositors' money at risk of loss. There may be bank buy ins should a bank run occur, which are basically giving depositors' worthless or depreciated stock in small banks, should their money run out.

Off shore accounts unlike bank accounts do not pay interest to their depositors' accounts, in alleged exchange to lend out the depositors' money, like what is done for savings accounts in banks. Off shore accounts do not lend out their depositor's money at interest to be potentially lost in a down turn. So, their unjust profit is safer than the common man, unless the courts or the law makers care to stop the wolves from eating the sheep, before they are slain. I think an Attorney General may choose to compel the government to act possibly under a bribe statute, to eliminate unjust laws that should be seen as bribery, like charitable deductions, business losses and the same, and the new type of entity the beneficial corporation, which gives other people's money away as alleged charitable donations, buying favors by a different form of Ponzi scheme. It is evil, by teaching the love of money, driving out the love for humanity, misleading people to hell by human sacrifice, sacrificing other people's interest instead of caring for them and protecting their free choice with regards to their own property, and liberty, not to become the world's property for merely existing and using natural resources, which were not created by those who seek to make a profit off its use.

I believe leaders who say “do your part,” “teamwork,” and misleaders who ask people to “contribute,” sin against God by societal peer pressure to adhere to the global plans to behave conditionally, conformed to their will, making their will be done like Satan, instead of safeguarding individual liberty to freely choose without government psychological substantial burdens, economic burdens as the global plans create or physical burdens by going without vital resources if you can not pay the unjust fees. The environmental plans use human sacrifice. My God desires mercy not sacrifice. See, *Matthew* 12:7. I believe human sacrifice reflects the image of the devil *Hebrews* 2:14, and greatly oppose the dirty schemes, policies, laws under the guise of saving the Earth, merely worsening it to control a no longer free people, in a borrowing society, where many people rent out everything without ownership, even sewage and water and air. It is a more dangerous type of Ponzi Scheme, of selling what the central banks do not own to control people, while receiving profit. The book wants the Central Banks to control governments. Our government must take back their coining power to coin to care for the people, and no longer be controlled or control the people.

My political-religious beliefs are repugnant to agents of the Court and arms of the Delaware Supreme Court. Various agents of the Courts interfered with my case *Kelly v Trump* with the intent or the reckless disregard that such conduct would cause a reasonable person to forgo her case, in violation of my procedural

and substantive due process rights and right to equal access to the courts without disparate treatment based on religious political beliefs. The Board and the Delaware Supreme Court also disparately treated me in denial of my substantive and procedural due process right to be heard, to have a fair opportunity to perform discovery, subpoena witnesses in this proceeding.

It is my religious belief the Courts have a choice to lay down pride and wear the cloak of humility to pursue “justice [with mercy] in the courts,” which is God’s will. *Amos 5:15, Matthew 23:23.*

There is a planned elimination of fiat currency, and an economic crash by design, leading to loss of government governing guiding authority. This Court is my hope of a hero, albeit not in this case, to preserve and strengthen our government by upholding Constitutional freedoms, even if this court seeks injustice against me for my belief in Jesus Christ or my political beliefs in love for humanity, not sacrificing humanity for the love of money. Money is not my God or guide. <sup>7</sup>

### **Burden of proof not met**

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<sup>7</sup> See Ans. Exhibits 16, 17, 18-19, with regards to an economic crash. See Ans-Exhibits 13, 14, 15 regarding preventing or reversing an economic crash, that will leave the United States vulnerable to the elimination of the government’s authority to govern, to be taken over by those it wrongly owes, should the courts not protect the liberty of the people through a writ of mandamus to President Biden to require Secretary of Treasury Janet Yellen to mint money without debt or interest, pursuant to 31 U.S.C. § 5112(k) or otherwise.

The state has not met its burden of proof of strict scrutiny to require I violate my religious beliefs by undergoing a professional mental examination, but for the exercise of Constitutionally protected conduct, which is strict scrutiny. (Transcript 38, 189-190).

The State seeks to compel me to undergo a mental examination in violation of my religious beliefs, or lose my active license to practice law, as inactive disabled, but for my exercise of petitioning the Court to alleviate a substantial government incited burden upon my exercise of religious beliefs in the case *Kelly v Trump*, the exercise of Constitutionally protected conduct, and to cover up Court misconduct in violation of my Constitutionally protected activity. (See, Exhibits and A, K.)

The State violates my First Amendment right to the free exercise of religion, speech, association and petition, by indicating my religious beliefs are evidence of a mental disability. (Petition at 7). I object. The state impermissibly seeks to condition my license to practice law on the surrender of my protected right to exercise religious belief, by forced violation of my religious belief, by requiring a mental examination opinion deeming me fit to practice law.

The State may not condition the exercise of a Constitutional liberty, upon the loss of a state earned and my entitled benefit in my Delaware active license to

practice law, but for the exercise of a Constitutional liberty, including the freedom to exercise of religious beliefs.

“To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right.” *Minn. Ass'n, Health Care v. Minn. Dept.*, P.W, 742 F.2d 442, 446 (8th Cir. 1984); Citing, *Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963).

“The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established.” Citing, *Jones v. Board of Education*, 397 U.S. 31, 34 (1970); E.g., *Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v. Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Frost Trucking Co. v. Railroad Comm'n*, 271 U.S. 583, 593-594; see *Van Alstyne, The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); *Comment, Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: (“One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.”)

“Neither the state in general, nor the state university in particular, is free to prohibit any kind of expression because it does not like what is being said.” *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970)

Conditioning loss of my property interest on the government’s compelling me to violate my religious beliefs is unconscionable.

Conditioning my loss of my property interest in my active license to practice law on my decision to exercise of Constitutionally protected conduct is also unconscionable, and will chill other people by exercising their right to access the courts to address grievances they believe to have been committed against them by the government, essentially making government above the law.

“State law has engendered a clear expectation of continued enjoyment of a license absent proof of culpable conduct by the [me. I, have] asserted a legitimate ‘claim of entitlement’ ” *Barry v. Barchi*, 443 U.S. 55, 65 n.11 (1979); *Citing, Perry v. Sindermann*, 408 U.S. 593, 601 (1972); see *Board of Regents v. Roth*, 408 U.S. 564 (1972); *Bell v. Burson*, 402 U.S. 535, 539 (1971); *Goldberg v. Kelly*, 397 U.S. 254 (1970).”)

The state unconstitutionally brings the petition in retaliation for my exercise of the right to petition, speak, associate as a democrat, Christian, indigent, attorney, injured party, for exercising my freedom of conscience, religious beliefs and religious exercise, in violation of the First Amendment, applicable to the state

pursuant to the Fourteenth Amendment, and violates the Constitution again, under a second layer, by seeking to compel me to violate my belief in Jesus Christ by forced mental examination , or lose my earned active attorney license to practice law, but for the exercise of protected conduct in bringing the law suit *Kelly v Trump*.

It is against my religious beliefs to be examined by mental health professionals. (Transcript 32, 36-37; 68-71, 105-112). I filed a Motion for a protective Order preventing Mental Examinations of my person as a government compelled violation of my religious belief in Jesus with the Board on January 31, 2022. (Exhibit X, Motion for a Protective Order, incorporated herein by reference). I believe mental health professionals teach anti-Christ thinking that damns people to hell. I do not believe or think the same way as others. That is not a disability but by free sound choice to lay down my life for Jesus, not man or money. I believe most people have the Anti-Christ spirit, not the holy spirit. I believe most people's minds are on man's desires, not God's. I do not think the same way as most of the world because of my religious beliefs. I believe people go to hell by living based on the desires of man instead of laying down human desires, to think, to know God's will, to love, to do God's will. Love is a choice not a feeling of happiness, but holiness. God, not money, or man, is my guide. God not money is my God. I believe people sin for making money their guide or God. I

believe people sin for making an expert or man their guide or God, should they not repent. I believe judges sin against God by delegating their thinking to experts, or blindly relying on prior judicial decisions, instead of using their own brain to think, to know, in order to love, under the facts.

The petitioner and the Board may not violate my First Amendment rights by taking away my paid for active license to practice law but for their disagreement with my religious beliefs and exercise of freedom of conscience, as displayed in my words and petitions which display my religious-political beliefs, nor may the Board examine my mental fitness based on desire to examine whether my belief in Jesus is mentally sound.

I object based on the improper reasons the State brought this case to punish me for the exercise of my fundamental rights, and to cover up state misconduct in interference with *Kelly v Trump*.

Because the Report and Recommendation substantially burdens my religious exercise, and my freedom of conscience to believe differently than the majority, the government must justify the State under strict scrutiny, the “most demanding test known to constitutional law.” *City of Boerne v. Flores*, 521 U.S. 507, 534 (1997). It cannot do so here. Unless the government demonstrates a compelling governmental interest, and uses the least restrictive means of furthering that interest, the Report and Recommendation must be set aside.



The State has not met their burden of proof, or provided evidence of a disability. Their recommendation must be rejected. The petition must be dismissed. I must be allowed to practice law, unencumbered by state restrictions.

The mere reviewing of assertions or findings by state agents regarding my pleadings without divulging why the State believes such information shows grounds of concern for mental disability is no proof, other than disagreeing with my religious political beliefs and exercise of fundamental rights, nor is the fact the Delaware Supreme Court dismissed the case as frivolous evidence of disability. (Transcript 10). There was no proof shown as to mental incapacity.

The state appears to merely show my exercise of Constitutionally protected activity, fundamental rights, and my poverty, lack of access to resources, including but not limit to, working computers, and phones, and other hardships, while defending and exercising my fundamental rights, as the reasons for bringing the petition, and for the reasoning for the Board's Recommendation and Report, requiring scrutiny.<sup>8</sup>

The State appears to use my Bible references against me as a fault. The State also claims that because it does not understand my religious beliefs, which they allege do not make sense to them as a reason for the petition. These reasons

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<sup>8</sup> Transcript regarding the state not meeting the burden of proof.189-190.

are unconstitutional in violation of my right to exercise and believe by the dictates of my conscience, not the dictates of the beliefs and religious understandings of the State under the First Amendment free Exercise Clause, and the prohibition against the establishment of Government religion, applicable to the State pursuant to the Fourteenth Amendment.

At Number 7 of the State's petition the state claimed "Respondent's statements ... are objectively illogical; and rely on non-legal sources, including the Bible, instead of appropriate legal authority."<sup>9</sup> The ODC restated a few of my biblical and religious arguments in the petition at Number 7.<sup>10</sup>

The United States Supreme Court accepted pleadings using Bible verses as authority to protect positions of a part's religious exercise and faith per the attached exhibit labeled as **Exhibit FF**, *Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced, et. al*, No.15-105, 2015 WL 5013734 (US).

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<sup>9</sup> (Citing retyped petition in my Ans. Page 88).

<sup>10</sup> Id.

My religious beliefs are in question in *Kelly v Trump*, and are the ODC's proclaimed reason for the petition brought against me, and are proper to defend in this case, as well as political beliefs. *Id. See also*, Exhibit DD, Report at 5.

The ODC, the Court and the Board have no authority, under the Constitutional law, to determine whether my religious beliefs make sense. They are required merely to determine whether they are genuine religious beliefs protected under the First Amendment.

The US Supreme Court held, in *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. "Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable."

Accordingly, the ODC and the Board have no business addressing whether my religious beliefs as outlined in *Kelly v Trump* are reasonable to them. *Also see*, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.), *cert. denied*, 456 U.S. 908 (1982); ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900,

84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa 1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934; *See, Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856; *In re Eternal Word Television Network, Inc.*, 818 F.3d 1122, 1140 (11th Cir. 2016) ("The Supreme Court cautioned that "federal courts have no business addressing" such questions of religion and moral philosophy." (Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714, 101 S.Ct. 1425, 1430, 67 L.Ed.2d 624 (1981), "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.")

The ODC and courts do not have to adopt my beliefs as true, but must merely ascertain whether my beliefs are genuine. It is improper for the ODC and the courts to find my religious beliefs of conscience illogical or not.

The United States Supreme Court held in *Cantwell v. Connecticut*, 310 U.S. 296 (1940):

“Under the constitutional guaranty, freedom of conscience and of religious belief is absolute; although freedom to act in the exercise of religion is subject to regulation for the protection of society. Such regulation, however, in attaining a permissible end, must not unduly infringe the protected freedom.”

The State wrongly deems my faith in Jesus Christ a danger to the public, when it is no danger to obey God by loving God and one another more than money, merriment and material gain. Nor is it a danger to the public to petition the Courts concerning disparate treatment against me based on religious or political beliefs and poverty. My conduct makes the public safe from tyranny by government employees or servants who behave above the law, by condemning beliefs that do not conform with their dictates. The State unduly infringes upon my protected freedoms, and punishes me for the exercise of freedoms.

I have the right to petition the Court when I believe there's been a transgression against me by former and the current President's establishment of government religion. *U.S. Const. amend I, U.S. Const. amend XIV.*

The fact the Court did not agree with me, and kicked out *Kelly v Trump* is not evidence of disability. Other attorneys and other parties have had cases kicked out based on standing, or deemed as frivolous. Yet, their attorney and the parties are not deemed disabled, but for, the exercise of rights, the Court disagrees with. It would harm the public to deem those whose cases were kicked out, for their

religious, political beliefs, speech reflecting political-religious beliefs or petitions to be disabled, and chill Americans from accessing courts to address grievances.

The fact, I made mistakes does not make me mentally disabled either. It makes me human, acting under great duress to protect the most important thing in my life, my Constitutionally protected exercise of religious beliefs, my ability to worship God without government incited persecution.

My political-religious beliefs are repugnant to the State, agents of the Court and arms of the Delaware Supreme Court. As aforementioned in the procedural history, various agents of the Courts interfered with my case *Kelly v Trump* with the intent or with reckless disregard that such conduct would cause a reasonable person to forgo her case, in violation of my procedural and substantive due process rights and right to equal access to the courts without disparate treatment based on religious political beliefs, in violation of the Equal Access Clause applicable to the State pursuant to the Fourteenth Amendment.

The fact that my religious beliefs do not conform with the beliefs of the majority or the state is not evidence of a disability. My choice to have the “mind of Christ” as opposed to the mind of the majority, or of the world, which I believe

is of the antichrist, is a choice I make with sound mind, no matter how insulting it is to the State or to the Court. <sup>11</sup>

The fact I seek to protect the exercise of my religious beliefs in Jesus Christ as Lord, not money as God and guide in my life does not evidence a disability. My religious beliefs are different from the world. I believe many things the government praises and teaches in public schools and elsewhere misleads people to give into temptations leading to harm and hell. I believe it is wrong to mislead people to harm and hell by teaching people following the beliefs and mindsets of the government through government backed private partners or otherwise is Christian and Godly.

I believe people go to hell for seeking money as guide and God in their life. In *Matthew* 6:24, Jesus teaches “No one can serve two masters. Either you will

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<sup>11</sup> (Citing, 1 *Corinthians* 2:16); (*Deuteronomy* 11:18 “Fix these words of mine in your hearts and minds; tie them as reminders on your hands and bind them on your foreheads,” meaning your minds); (*Deuteronomy* 6:8 “Tie them as reminders on your hands [meaning by how you live] and bind them on your foreheads [by how you think, having the mind of God, the Word of God on your mind through the father, Son and holy spirit]”; (*Exodus* 13:16 “So it shall serve as a sign on your hand [meaning how we live] and a symbol on your forehead, [meaning by how we think], for with a mighty hand the LORD brought us out of Egypt.”); (*John* 14:26 “the Advocate, the Holy Spirit, whom the Father will send in my name, will teach you all things and will remind you of everything I have said to you.” This means what Jesus Christ says will be on our mind, the holy spirit reminds us of God’s word and word made flesh, Jesus Christ); (*Romans* 12:2 “Do not conform to the pattern of this world, but be transformed by the renewing of your mind. Then you will be able to test and approve what God’s will is—his good, pleasing and perfect will.”); (1 *Corinthians* 2:14, “**The person without the Holy Spirit does not accept the things that come from the Spirit of God but considers them foolishness, and cannot understand them because they are discerned only through the Holy Spirit.**” (emphasis intended))

hate the one and love the other, or you will be devoted to the one and despise the other. You cannot serve both God and money.” In *Matthew 6* Jesus teaches people have the evil eye, when they look at others for money and material gain to care for their own, without clear eyes, to see God and others with love, unconditionally.

Business is not the sin. It is when the love for money and material gain drives out our love for God and one another. I believe business greed is the mark of the beast, also known as the mark of the whore or, “having a forehead [mind] of a whore” by mind on material gain to care for your own, driving out love from your mind, to think about others with love and respect unearned required, citing *Jeremiah 3:3*, and the mark of children of the devil, who merely conditionally care based on relationship, reward and avoidance of harm with no God in them. For God is unconditional Love. Citing, 1 *John 4:16*, with regards to children of the devil see, *Matthew 13*, 1 *John 3:10*, *John 8:44*.

Children of God lay down their desires and the desires of man to do the will of God, which is love, not lust. Those who live based on their feelings, lusts, desires, or desires of man are easily enticed by those who manipulate desires, and are controlled by the evil one, Lucifer. In 1 *John 5:19*, the Word teaches, “We know that we are children of God, and that the whole world is under the control of the evil one.”



I believe people go to hell for seeking the praise of man instead of the praise of God.<sup>12</sup> I believe people are misled to harm and hell for trusting in man, experts as guide and God in their life, instead of obeying God by individually exercising their own free will to analyze information, without blindly relying on professionals, to think, to care to know in order to know.<sup>13</sup>

Jesus teaches call no one your teacher but God. *Matthew* 23:8-10. God commands us not to trust in man, but to trust in God as guide.

I believe people go to hell for organized charity, fundraising and pro bono, should they not repent of such evil. It is so dirty and wicked. Jesus teaches we cannot serve God and money, and not to chase after money as savior in place of God as savior, as those who collect money by fundraising appear to do.

In *Matthew* 6:1-4. Jesus commands us not to give charity seen, and when we *give, not to know our left hand from our right hand, meaning do not give to get* under the guise of charity. Giving to get is business, not charity, good or love.

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<sup>12</sup> *Galatians* 1:10, ("Am I now trying to win the approval of human beings, or of God? Or am I trying to please people? If I were still trying to please people, I would not be a servant of Christ."); *1 Thessalonians* 2:4, ("But as we were allowed of God to be put in trust with the gospel, even so we speak; not as pleasing men, but God, which trieth our hearts."); *Romans* 8:8-9, ("Those controlled by the flesh cannot please God. You, however, are controlled not by the flesh, but by the Spirit, if the Spirit of God lives in you. And if anyone does not have the Spirit of Christ, he does not belong to Christ.")

<sup>13</sup> *Jeremiah* 17:5-7, ("Thus saith the LORD; Cursed be the man that trusteth in man"); *Psalms* 146:3, Put not your trust in princes, in mortal man, who cannot save. *John* 14:1, ("Don't let your hearts be troubled. Trust in God, and trust also in me.").

Teaching business is charity, good or love, drives out God from the hearts of man, love from the hearts of man, and replaces it with the love of money and material gain, misleading people to hell, should they not repent. (See, 1 *John* 4:16 “God is love.”)

The fact I exercised my Constitutionally protected right to access to the courts as a party, not as a professional attorney advocate, in forma pauperis, without the tools a professional hired attorney requires, is not evidence of a disability, but is evidence of my passion to uphold my First Amendment right to exercise my religious belief in Jesus without government incited economic, social or physical or economic persecution. I did not even have a working computer at the time I filed *Kelly v Trump*. My poverty is not a disability.

The State failed to meet the burden to infringe upon my property interest in my license, but for the exercise of my fundamental rights, thereby also burdening my exercise of fundamental rights. The State has not met its burden of proof to meet strict scrutiny.

I am no danger to the public, but the state’s retaliation and disparate treatment towards me, by removing fair access to the courts to those the state disagrees with is a danger. If the state is permitted to punish me for the exercise of my rights by forcing me to choose between, either a reduced property interest in my license to practice law, or compelled violations of my beliefs in Jesus by

violations of my faith by mental examination, I and the citizens of the United States, will suffer irreparable injury: 1. In terms of suppression of the fundamental right to freely exercise religious beliefs, or not, without fear of government persecution, or compelled violation of religious beliefs in violation of the First Amendment applicable to the state pursuant to the Fourteenth Amendment, 2. In terms of a license for government agents to create a substantial burden upon respondent's and citizen's right to petition the courts, and right to defend the exercise of petitions against claimants by government agents for the exercise of Constitutionally protected activity, in possible violation of the procedural and substantive Due Process clause's protections, 3. And in terms of declaring me mentally disabled for merely thinking differently than the state, thereby setting precedent the public may be declared mentally disabled for thinking differently, 4. In terms of deeming me unworthy to work and buy and sell as an attorney because my religious beliefs do not align with the beliefs of the state.

Irreparable injury is presumed with a loss of first Amendment freedoms, including the right not to be forced by government agents to violate one's own religious belief. *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

Infringement of First Amendment rights are generally not compensable by money damages and are therefore irreparable. The harm noted herein, such as the freedom to worship or not according to the dictates of one's own conscience

without government sponsored persecution or forced violations of religious belief is certainly irreparable.

Any interest the state may have, is not necessary to meet a compelling interest to force me to violate my religious beliefs by undergoing a professional examination or by loss of my license but for believing differently.

Given the fundamental rights at issue, and the requirement state has failed to prove in furtherance of a compelling government interest, using the least restrictive means of furthering that compelling government interest that is somehow more important than my freedom to freely exercise my first amendment right to exercise my religious beliefs, I have met my burden.

The State has no important interest or necessary interest in compelling an expert to examine or observe me for the purpose of determining whether my active license to practice law should be taken away as retaliation for my exercise of the right to petition, speak, associate and worship. I have not worked as a lawyer in over 6 years. I do not enjoy litigation. I hate it, but I love God, and was willing to do what I hate to uphold my ability to worship God without government incited threats against me. My family is struggling during this global pandemic and economic down turn. I would like the opportunity to perform real estate settlements at my old law firm. So, I can afford to live and help them live, by using the company vehicle, and giving my father the car, he gave me back. They

will likely not hire me back should I be punished for the exercise of fundamental rights.

The petition and the report were made for the unlawful purpose to cover up the state's misconduct against me, and to punish me for exercise of fundamental rights, and religious and political beliefs, with no necessary purpose somehow more important than my exercise of constitutionally protected conduct, narrowly tailored by the least restrictive means to justify reducing my property interest in my license to practice law or by compelling me to violate my religious beliefs.

With the economy growing worse, my loss is great, while the state has no necessary interest in punishing me for standing up for my religious beliefs against government incited substantial burden.

### **Objections**

I object to the state's denial of fair equal access to the courts based on my religious beliefs, political beliefs and poverty. I object to the state's actions in seeking to eliminate my ability to work, by taking away a property interest in my earned and expected active license to practice law, while violating my Substantive and procedural due process rights, applicable to the state pursuant to the Fourteenth Amendment in this case to force me into poverty, indefinitely, for the exercise of my Constitutionally protected rights, in violation of the Equal Protections Clause

applicable to the State pursuant to the Fourteenth Amendment, by disparate treatment against me based on religious or political beliefs and poverty.

I object, to the biased forums by both the Board and the Delaware Supreme Court against me based on my religious beliefs, political beliefs, religious exercise, exercise of the right to petition, speech or based on poverty, deeming me unworthy of fair access to the courts, and denial of my opportunity to be heard on appeal, a fair opportunity to prepare, present discovery, subpoena witnesses, research, and cross examine my accusers.

I object to the lack of accommodation to my poverty, and object to the condemnation by the State for using poverty and lack of working computers, Zoom, access to working printers, a phone, or other resources, as evidence to be used against me as a disability, as I sought to defend the exercise my fundamental rights.

My poverty, and lack of resources such as working technology causes a substantial burden upon my access to the courts. Instead of condemning the least of these, me, the State should seek to uphold the rights of all people, including me, to guarantee fair access to the courts by accommodations for those without resources the State takes for granted, in conformity with the Equal Protections Clause to afford Equal or at least fair access to the courts pursuant to the Fourteenth

Amendment so I may defend my exercise of liberties, and property interest in my license from being wrongly taken away by state accusers. Poverty is not a disability.

The type of violation alleged here involves an examination of “impartiality *Schweiker v. McClure*, 456 U.S. 188, 195, overturned on other grounds by *Heckler v. Ringer*, 466 U.S. 602, 604 (1984).

I will address the Delaware Supreme Court’s bias or appearance of bias against me, with regards to inciting the petition, and later discuss the bias by the Delaware Supreme Court in depriving me of a self-representation, religious exercise, and a fair opportunity to prepare, present and defend my exercise of fundamental liberties in the proceeding, and will address various violations of the Board’s deprivation of my opportunity to a fair proceeding.

The State and the Delaware Supreme Court are unfair biased forums, disparately treating me based on disdain for my exercise of fundamental rights, especially my belief in Jesus, thereby, depriving me of a fair trial, where the outcome is fixed to the State’s advantage.

The United States Supreme Court in *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242 (1980) held:

“The Due Process Clause entitles a person to an impartial and disinterested tribunal in both civil and criminal cases. This requirement of

neutrality in adjudicative proceedings safeguards the two central concerns of procedural due process, the prevention of unjustified or mistaken deprivations and the promotion of participation and dialogue by affected individuals in the decision making process. See *Carey v. Piphus*, 435 U.S. 247, 259-262, 266-267 (1978). The neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law. See *Mathews v. Eldridge*, 424 U.S. 319, 344 (1976). At the same time, it preserves both the appearance and reality of fairness, "generating the feeling, so important to a popular government, that justice has been done," *Joint Anti-Fascist Committee v. McGrath*, 341 U.S. 123, 172 (1951) (Frankfurter, J., concurring), by ensuring that no person will be deprived of his interests in the absence of a proceeding in which he may present his case with assurance that the arbiter is not predisposed to find against him. The requirement of neutrality has been jealously guarded by this Court."

In my case, the Court and the State are biased towards upholding the mere appearance of the Courts, and Government actors, blinding their eyes to see clearly to uphold and seek justice in my case by upholding my Constitutionally protected activity from government actors' retaliation against me, within its own judicial branch, or arms of the Delaware Supreme Court and by the Presidents of the United States.

The Delaware Supreme Court appeared to have instigated the ODC action against me. The Judge must not be the prosecutor or the witness too. The Court lacks subject matter jurisdiction based on violations of my opportunity for a fair and impartial trial, in violation of my substantive and procedural due process rights, based on the partiality of the Court to persecute me for the exercise of my Fundamental rights, and denial of procedural due process rights, based on



discriminatory motives. Lack of subject matter jurisdiction may be brought up at any time. Del. R. Civ. P. Super. Ct. 12 (h)(3). (Incorporating by reference My Answer to the Petition, and Exhibits thereto (“Ans”); (Transcript at 6-7)

The State also brought a petition against me for my petitions to the Delaware Supreme Court to exempt lawyers from bar dues due to economic hardship during the global pandemic.

The Delaware Supreme Court incited the attack by DE-Lapp. Since De-Lapp’s threatening letter was based on information I sent to the Delaware Supreme Court, addressed to the Chief Justice.<sup>14</sup> The Clerk of Court told me the entire Court reviewed my requests relating to relief from attorney dues, not merely the Chief Justice. *Id.* Thus, the entire Delaware Supreme court appeared to have incited the petition against me by its arms, making the hearing unfair, a fixed proceeding in violation of the Procedural and Due process clause.

The Delaware Supreme Court was aware of the unlawful acts by the state made to interfere with my case *Kelly v Trump*, or made in reckless disregard that such interference would cause a reasonable person to forgo her case. I petitioned the court by motions regarding the state conduct. *Id.*

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<sup>14</sup> Exhibits B, B-2, C, D, E, F, G, H, H-2, U, BB and CC, and Exhibit K, Ans-Ex-20, 21, 22, 23, 27, 28, 29.

The Supreme Court incited, participated or foreseeably caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms' interference in my lawsuit *Kelly v Trump* in violation of 42 USC Section 1985(2).  
Id.

Whether the Delaware Supreme Court's report to DE-Lapp was out of concern for poverty or a malicious purpose is unknown. Yet the Justices knew or should have known that interference with a party's access to the court and right to petition in an active case was a violation of federal and Constitutional law. A complaint was made, apparently by the Supreme Court or its agent, based on my petition for relief from attorney dues to the arms of the Court. De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission. The Delaware Supreme Court did not grant my petition, and ignored my second petition, dated February 5, 2021, deeming me unworthy of the opportunity to be heard on relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amendment, as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights. (Exhibits, B-J,). The Delaware Supreme Court's apparent incitement of the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights.

In addition, the Delaware Supreme Court gave the law library access to PACER. The Court's subscription to PACER is evidence of its intent to sue me or to aid another to sue me in retaliation of my exercise of the right to petition the courts where I believe there has been a grievance against me by former President Trump's establishment of government-religion. A Supreme Court Justice, Justice Gary F. Traynor, came into the law library, as I was performing research, asking for federal court jury instructions too, which also made me concerned the judiciary was retaliating against my petitions to the court regarding the interference in *Kelly v Trump*, and deprivations of liberties and property interest in my license to practice law, but for the exercise of my fundamental rights.

Around the middle of the 20<sup>th</sup> Century, the United States Supreme Court found the due process clause was violated by a "judge who was at the same time the complainant, indicter and prosecutor." *In re Murchison*, 349 U.S. 133, 135 (1955).

Due process is violated in my case by a Constitutionally deficient procedure before a partial forum to safeguard deprivation of my own liberty to religious beliefs, religious exercise, political beliefs, association, speech, the right to petition the courts when I believe a grievance has been committed against my person, and deprivation of my property interest in my license, by allowing the prosecutor to be the judge and jury too.

The Court and the board showed disparate treatment towards me, and partiality towards the ODC.

A judgment may be void if a court "acted in a manner inconsistent with due process of law." *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at \*3 (3d Cir. May 11, 2005). The Report must be deemed void, as the Delaware Supreme Court and the Board, is without subject matter jurisdiction due to the inherent unfair, biased position it has towards me by contributing to the petition against me but for the exercise of my right to petition the Delaware Supreme Court, based on disdain for my religious or political beliefs, speech and to cover up Court's agents' interference with my access to the courts.

I have a "right to be tried by an unbiased and impartial judge without a direct personal interest in the outcome of the hearing [as prosecutor or witness]." *Ungar v. Sarafite*, 376 U.S. 575, 584 , *Citing, Tumey v. Ohio*, 273 U.S. 510."

Per the US Supreme Court in *Peters v. Kiff*, 407 U.S. 493, 502 (1972), Overruled in *Gregg v. Georgia*, 428 U.S. 153, 169 (1976), on other grounds,

"[E]ven if there is no showing of actual bias in the tribunal, [the US Supreme Court] has held that due process is denied by circumstances that create the likelihood or the appearance of bias. This rule, too, was well established long before the right to jury trial was made applicable in state trials, and does not depend on it. Thus it has been invoked in trials to a judge, e. g., *Tumey v. Ohio*, 273 U.S. 510 (1927); *In re Murchison*, 349 U.S. 133 (1955); *Mayberry v. Pennsylvania*, 400 U.S. 455 (1971); and in pre-

Duncan state jury trials, e. g., *Turner v. Louisiana*, 379 U.S. 466 (1965); *Estes v. Texas*, 381 U.S. 532, 550 (1965).”

The State forum does not have subject matter jurisdiction. Since the Court denied me a fair hearing in the state proceeding by the Board, and appeared to have participated in denying me of a fair trial in *Kelly v Trump* to cover up court misconduct and based on disagreeing with my religious beliefs, political affiliation and finding my poverty and lack of resources as a reason to declare me unworthy of the right to be heard.

The Delaware Supreme court also colluded with the Petitioner, and the Board of Professional Responsibility for the Supreme Court (“Board”), by denying me a fair hearing, by denying me an opportunity to prepare and present a defense, and by colluding with the Board by denying me an opportunity to be heard on appeal until my Constitutional rights under the substantive and procedural Due Process Clause of the Fourteenth Amendment were already violated.<sup>15</sup>

In its recommendation, the Board accuses me of disloyalty to the law because I sued President Trump to uphold my Constitutional right to free exercise

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<sup>15</sup> *McGautha v. California*, 402 U.S. 183, 256-57 (1971) held, “where federally protected rights are involved, due process commands not only that state procedure be adequate to assure a fair hearing of federal claims, *In re Gault*, 387 U.S. 1 (1967), but also that it provide adequate opportunity for review of those federal claims where such review is otherwise available. *Goldberg v. Kelly*, 397 U.S., at 271; *Boykin v. Alabama*, 395 U.S. 238, 242-244 (1969); *Jackson v. Denno*, 378 U.S. 368, 387 (1964).”

of religion, without a government substantial burden for such exercise, by dissolving the establishment of government religion. (Exhibit DD at 2, 4, 5)

Upholding the Constitution limits upon government agents, not the lawless, lustful desires of government agents, is loyalty to the law, as opposed to leaders in positions who violate the law. Holding the President, and government agents, including the State, to the law, to the Constitutional limits on their authority, helps government leaders better serve their people. Upon request, Courts have a duty to guide misguided government agents, such as the President and other government agents by exercising their most important Constitutional check to balance out the other branches.

The Board ignored some outstanding motions, dated December 18, 2021, December 31, 2021, January 15, 2022, January 25, 2022, and January 31, 2022, while rendering two orders in E-mail, non-appealable form to evade my right for an opportunity to be heard on appeal. (Please see attached Exhibits R-1 and Exhibit U-2, and look at email rendered decisions of the Board.)

I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of

subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on January 10, 2022. The Board indicated the hearing was on schedule for January 13, 2022.

The Board failed to allow me to be heard on my December 18, 2021, and December 31, 2021 outstanding motions, in contravention to the Procedural and Substantive Due Process requirements under the 14th Amendment., and based on disparate treatment in violation of the Equal Protections grounds motivated by disdain for my religious-associated beliefs or poverty, demeaning me as unworthy of being heard, one served December 18, 2021 via US Mail, requesting suspension of the hearing due 1. to ineffective service, and, 2. Requesting a suspension of hearing date until, a final determination is made on counsel, and 3. Until discovery is complete, to allow time and opportunity for me to prepare a defense, and the second outstanding motion served via US mail on December 31, 2021, with courtesy copy emailed to the Board and Patricia Swartz regarding Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs.

On the afternoon of December 30, 2021, two weeks prior to the original hearing date, the State Court granted me permission to represent myself, after fighting for the right to do so since I discovered counsel was appointed.

I did not delay in contacting the Board on the status of my request to suspend the hearing until an adequate opportunity to prepare was granted.

However, the Board in bad faith, delayed in responding to my multiple requests on my motions for an adequate opportunity to prepare, until January 10, 2022, only two full additional days before the scheduled hearing.

The Delaware Supreme Court, refused to consider orders until after it was too late to prevent the irreparable loss of my right to a fair proceeding, by denying an opportunity to perform discovery, subpoena witnesses, prepare and present evidence by cross examining witnesses at a hearing, by indicating it would only consider any of the Board's orders after the hearing was conducted and report was rendered. (Exhibit R-1).

The Court stated:

“The decisions of the panel chair or panel may not be appealed before submission of the panel's final report and recommendation to this Court. When the panel submits its final report and recommendation to the Court for review, Respondent will have the opportunity to object to the report and recommendations as well as prior rulings of the panel chair.”

The Supreme Court evaded allowing me an opportunity to be heard on appeal until it was too late, and my Due process right for an opportunity for a fair



hearing, with witnesses, and discovery was already violated. Therefore, the Court encouraged or supported Due process violations against me in the hearing before the Board, in a biased proceeding against me to cover up Court actors' own misconduct and to punish me for my religious beliefs, political beliefs, speech and the exercise of the right to petition.

The Supreme Court caused additional alarm by their reference in the footnotes of the Court's Order to a separate proceeding regarding incapacity with the same alleged procedural rules as the Board Proceeding.<sup>16</sup>

The Court provided:

"1 Respondent also filed the Motion in the Board on Professional Responsibility. 2 Del. Lawyers' R. Disciplinary Proc. 2(c). Procedures and hearings for proceedings to determine incapacity are conducted in the same manner as disciplinary proceedings. Id. 19(c). 3Id. 9(e); 19(c)."

I have religious objections to being examined by mental health and healthcare professionals. I believe people are thrown into the fires of hell for blindly trusting mental health experts as authority, guides or God, in place of using their own brain, to critically think, to know in order to love humanity, not sacrifice humanity for money and material gain.

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<sup>16</sup> My belief in Jesus is not a mental disability, nor is my poverty. The Board's proceeding prevents me from seeking to get my old job back, maintaining my poverty. The Board's reference to a mental health proceeding is insulting to me and my God.

Psychology is so evil, the study of the mind, by assuming man may be controlled physically, by chemicals, socially by conditionally conformed caring, not love, through wicked behaviorist theories, or by enticement through physical desires temptations, of reward and avoidance of harm, and conditional relationships. God teaches we have free will. We always have a choice.<sup>17</sup>

The mind of Christ, those with God as their Guide, unconditionally love God freely, not by forced, scientifically conditioned pressured choice. I am a born-again follower of Jesus Christ. I am not the same as the world. I am not controlled by the world. The bible teaches the world is controlled by the devil, and every person in it who does not lay down man's desires for God's is controlled by the devil. The devil controls people by enticing them to reflect his image, the image of the antichrist, by living based on worldly desires, not laying down their desires, to use

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<sup>17</sup> 1 *Corinthians* 10:13, (No temptation has overtaken you except such as is common to man; but God is faithful, who will not allow you to be tempted beyond what you are able, but with the temptation will also make the way of escape, that you may be able to bear it.); *James* 1:13-14, ("When tempted, no one should say, "God is tempting me." For God cannot be tempted by evil, nor does he tempt anyone; but each person is tempted when they are dragged away by their own evil desire and enticed."); *Sirach* 15:11-17, ("Do not say, 'It was the Lord's doing that I fell away': for he does not do[b] what he hates. Do not say, "It was he who led me astray"; for he has no need of the sinful. The Lord hates all abominations; such things are not loved by those who fear him. It was he who created humankind in the beginning, and he left them in the power of their own free choice. It was he who created humankind in the beginning, and he left them in the power of their own free choice. If you choose, you can keep the commandments, and to act faithfully is a matter of your own choice. He has placed before you fire and water; stretch out your hand for whichever you choose. Before each person are life and death, and whichever one chooses will be given.")

their conscience mind to do God's desires, a.k.a. God's will. Love is a choice, not a feeling.

Please note, I was required to think outside the box to force the Board to render a decision, as they sat on my other motions, by filing it with both the Board and the Court. The Board made a decision. I appealed the decision to the Delaware supreme Court, and made another motion to the Board on January 15, 2022.

On January 12, 2022, I appealed the Board's Order by filing Respondent Meghan M. Kelly's Motion Appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend her exercise of fundamental rights and to preserve her license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense, dated January 12, 2021.

On or about January 13, 2022, I filed a motion for the state Court to make an immediate emergency determination on my motion to appeal.

On January 13, 2022, the ODC attempted to provide a response to the December 18, 2022 Motion served December 21, 2022 beyond 20 days allowed, when the issue was already determined by the Board by the January 11, 2022 order, to harass me and distract me from preparation when I already indicated to the Board and Court, I did not have enough time to research or prepare a defense.

The ODC dishonestly asserted, in their motion, I had an opportunity to call witnesses, despite only having an order allowing me to represent myself granted on December 30, 2021, with no time permitted to date for discovery, and no time allowed to issue subpoenas in contravention of the Substantive and Procedural Due Process and Equal protections Clause as applied to me.

So, without delay, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment, motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed lusts. I was not sitting on this, but acted in haste to protect and assert my Constitutional rights to prevent waiver.

On January 15, 2022, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto as Exhibit U, and incorporated herein in total, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

I informed the State I was not ready, and needed time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The State failed to grant me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is

no legitimate or important reason for the State to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amendment.

The State denied me the opportunity to call witnesses, gather facts, research and present evidence for a defense against me to protect my life and liberty, against state punishment for the exercise of First Amendment rights.

“Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010). The State acted above the law in the proceeding below, and declared me below the law, by denial of Constitutional protections, motivated by disdain for my religious beliefs and poverty.

I suffered irreparable harm in deprivation of my right to procedural and substantive due process rights, in an unfair proceeding, by a biased Board, as applied, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. ‘The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.’” *Mullin v. Sussex Cnty.*, Delaware, 861 F. Supp. 2d 411, 427 (D. Del. 2012); *Citing, Indian River Sch. Dist.*, 653 F.3d at 283 n. 14

(quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

The State may have power, but it does not have the power to act above the law, above the Constitution. Even I, an accused Christian, am afforded Constitutional rights, including but not limited to the right for a fair and impartial proceeding, right for an opportunity to prepare a defense, right to be heard, right to notice, right to free speech, association, religious exercise, and the fundamental right to petition the courts for relief, without interference and disparate retaliation against me from the state but for my exercise of fundamental rights. The State has not met the burden of strict scrutiny to infringe upon my exercise and assertion of Constitutional rights.

The right for the opportunity at justice is not a guarantee. It is the right to petition the Courts, without state punishment, that must be protected. Otherwise, only the Courts may selectively apply who has rights or not in, violation of the Equal Protections Clause, applicable to the state pursuant to the Fourteenth Amendment.

Courts are a government service of the people, created to govern and guide not control, not exploit people for the bottom line or convenience. The government does not run on money.

The government runs on individual free choice, the collective free choice of the many who agree to respect the Constitutional laws and protections of all people regardless of diverse political beliefs, race, religion, poverty, gender, age or place of origin. When individuals within government no longer respect the Constitutional laws that make us free by limiting their government power, we are no longer a free people, but a for sale enslaved people in violation of the Thirteenth Amendment.

The Free exercise of speech, association, right to petition, and religious exercise, and freedom of conscience have not been sold, making it not a freedom, but a bargaining chip to exchange by relinquishment to serve business greed, by acceptance of a professional license to practice a profession, my license to practice law.

The Delaware Supreme Court wants my head on a platter, but for my religious beliefs, and denied me the opportunity to perform discovery, subpoena witnesses, prepare and present a defense by claiming my opportunity to prepare and present a defense was a frivolous request to appeal, in a second order, labeled as Exhibit V.

The Court held,

“Upon careful consideration of the motion appealing the order of the Board on Professional Responsibility dated January 11, 2022 (“the Motion”) filed by Respondent in this Court, the Motion is denied for the reasons stated in this Court’s January 11, 2022 Order. The Court will not rule on any further



frivolous motions or appeals that Respondent files in this matter before the panel submits its final report and recommendation for the Court's review." Id.

The Delaware Supreme Court violated my opportunity to be heard on appeal in the state proceeding, and appeared to make its decisions on my defenses before I was afforded an opportunity to be heard by rendering them frivolous.

The fact the DE Supreme Court noted my appeal for due process violations, preventing me the opportunity to prepare, to subpoena witnesses to deny me of the right to a fair trial by affording me opportunity to present a defense was frivolous, shows they already made a decision on my defense, before I was afforded a fair opportunity to be heard.

There is no subject matter jurisdiction when the Courts violate the Fourteenth Amendment Due Process Clause by an unfair fixed trial. This case is different because the Court overseeing my case appeared to incite the case against me, and participated in denial of opportunity to be heard in violation of the substantive and procedural due process clause.

The Delaware Supreme Court also appointed counsel, despite notice of my religious objection to such appointment in violation of my free exercise of religious beliefs applicable to the state pursuant to the First and Fourteenth Amendments.

I also informed the ODC to my objection to appointment of counsel based on religious beliefs. I am standing up for my religious beliefs and religious exercise. I believe that my advocate for my faith in Jesus is the holy Spirit in this case.

In *Mark* 13:11 Jesus said “But when they arrest you and hand you over, do not worry beforehand what to say. Instead, speak whatever you are given at that time, for it will not be you speaking, but the Holy Spirit.” See, *John* 14:26, “The Advocate, the Holy Spirit, whom the Father will send in my name, will teach you everything, and remind you of all that I have said to you.”

I trust in God, not in man, to defend my religious beliefs without compromise, even if I am persecuted as the Bible teaches, we will be if we follow Jesus. <sup>18</sup>

I alerted the Delaware Supreme Court concerning my religious objection to appointed counsel in a letter, dated November 21, 2022.

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<sup>18</sup> (*John* 15:19-21, “If you were of the world, it would love you as its own. Instead, the world hates you, because you are not of the world, but I have chosen you out of the world. Remember the word that I spoke to you: ‘No servant is greater than his master.’ If they persecuted Me, they will persecute you as well; if they kept My word, they will keep yours as well. But they will treat you like this because of My name, since they do not know the One who sent Me”); (*John* 17:14, “I have given them Your word and the world has hated them; for they are not of the world, just as I am not of the world.”); (*James* 4:4, “You adulteresses! Do you not know that friendship with the world is hostility toward God? Therefore, whoever chooses to be a friend of the world renders himself an enemy of God.”); (*Luke* 6:22, “Blessed are you when people hate you, when they exclude you and insult you and reject your name as evil, because of the Son of Man.”)

Yet the Delaware Supreme Court appointed Counsel despite my objection on December 13, 2021. The Board couldn't have sent me or appointed counsel notice on December 10, 2021, because no counsel was appointed, at that time, and I at no time accepted representation from counsel, but rejected his services immediately.

Despite that, I had to fight for my eternal soul, by filing a motion letter to the Board, dated December 18, 2021, and a Motion for reconsideration of order, dated December 13, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021, with the Delaware Supreme Court, dated December 20, 2021, with a copy to Petitioner, and the Board, albeit the Board's copy was mailed Dec.21, 2021 (Exhibits M and N).

On December 21, 2021, I did not delay in asserting my Sixth Amendment Right to represent myself, and my First Amendment Right to exercise my religious beliefs without compelled violation, in exercise of my defense by sending letter and attachments to the Delaware Supreme Court regarding my objection to appointed counsel, and the inappropriate act of giving unaccepted counsel the notice, which was not provided to me or anyone on my behalf on December 10, 2021. (Exhibit O).

I was under great emotional distress at the prospect of being forced to violate my religious beliefs. So, I sent the Court another letter, dated December 29, 2021, along with Exhibits A-L, alerted the Court I received notice of the hearing on December 24, 2021, and the hearing was about two weeks away, and I did not even have 6th Amendment permission to represent myself to perform discovery, at the time, and sought discovery. (Exhibit P).

It was not until, On December 30, 2021, the Court excused appointed counsel, with about two weeks before the hearing date.

I was grateful one hill was overcome, but I still had not received permission to perform discovery per my December 18, 2021 request. I started to notice a rash I believe was the shingles, because I had it before, and began to feel really badly.

Yet, I still sought discovery and for an opportunity to prepare, research and present a defense to defend the exercise of my Constitutionally protected conduct. I emailed the Administrator of the Board to confirm she had received the December 18, 2021 motion on December 24, 2022, prior to the holiday. The next week, I attempted to call the Administrator of the Board from the law library twice to check on the status of my request to perform discovery, objecting to insufficient notice, and to postpone the hearing in order to have a fair adequate amount of time to prepare, and present my case, including discovery. She did not respond to my calls. I did inform the ODC and the Board I was ill during this global pandemic

with what I believe was the shingles, as I hope they would inform me if they were ill too, to prevent the potential spread of disease. The next week I emailed the Administrator to check on the status of my December 18, 2021 motion while copying the ODC. She did not respond to my motion, or to my email. I at no time delayed. So, on January 10, 2021, I asked her again about the status of the hearing, and she emailed an unofficial unprofessional unsigned decision by the Board, treating me less than and without swift fair response to allow me an opportunity to prepare and present my case. I appealed the informal order. The Delaware Supreme Court denied it, and the Board granted a request for a reason I did not ask for on January 11, 2022, allowing a postponement for 5 business days, 8 total days due to a holiday, which is not enough time to perform discovery of the ODC, or serve witnesses with subpoenas, under the facts of the case, especially since I sought to perform discovery first, before subpoenaing witnesses. (Exhibits R, R-1, R-2,).

On or about January 12, 2022, I appealed the Board's Order with the Delaware Supreme Court by filing, *Respondent's Motion appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in my motion to grant postponement to afford me opportunity to prepare a defense, perform discovery, research, file*

*motions, be heard on outstanding motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense is granted, and moved the court to suspend a hearing date until the parties and the Board determine a fair opportunity to perform discovery has been allowed so as not to violate the norms of a fair proceeding, displaying disparate treatment towards respondent based on my unique religious political beliefs, in violation of the Equal Protections clause applicable to me as a party of one. (Exhibit S)*

The next day, a Thursday, I filed [Respondent's] Emergency Motion for Immediate Relief requesting review of Respondent's Motion Appealing Order of the Board of Professional Responsibility of the Supreme Court of the State of Delaware, Dated January 11, 2022, Granting Postponement of the Hearing for 8 days due to illness, not a reason identified in my motion to Grant postponement to afford me an opportunity to Prepare a defense, perform discovery, research, file motions, be heard on outstanding Motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and the hearing date should be postponed until after a fair opportunity to build a defense is given, dated January 13, 2022, with the Delaware Supreme Court. (Exhibit T).

That same day, the ODC filed a motion rendered moot by the Board's decision to distract me in bad faith.

On January 15, 2021, I filed *Respondent's more particularized Motion to suspend hearing to allow opportunity for her to research and prepare a defense, and request for opportunity to draft requests for admission, interrogatories and subpoena opposing counsel as witness, as a necessary witnesses to her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show Unconstitutional motive for the petition, to allow the accused, the Respondent an opportunity to defend herself on the defense of illegality of proceeding, as applied to her, motivated by disdain for her religious beliefs, associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against Respondent.* (Exhibit U).

I was not delaying or sitting on the case, and had no opportunity or time to perform discovery and subpoena witnesses, and at no time waived the right.

After the holiday, it was until Tuesday January 18, 2022, that the Delaware Supreme Court rendered its order, and the board rendered an unappealable order,

with 2 more days before the hearing, with no time to perform discovery or subpoena witnesses.

I object to the deprivation of my right to a fair proceeding, for the denial of my opportunity to adequately prepare under the circumstances, to perform discovery and to cross examine my accusers, the Board, the ODC and the Delaware Supreme Court acted coldly, heartlessly without mercy to fix the proceeding against me to cover up state wrongs and to punish me for my protected religious and political speech and beliefs I sought to safeguard. Even people with beliefs the majority finds repugnant are protected under the Constitution from state and government incited private persecution. I came to the court to safeguard my free exercise of religion, only to be condemned by the court for my belief in Jesus.

### **Objections**

I object to Board, the ODC's and the Delaware Supreme Court's violations of my substantive and procedural due process clause rights, and discriminatory treatment towards me based on my religious, political beliefs, speech, right to petition the courts, poverty, and malicious intent to sacrifice my rights, my reputation, and my license to practice law, to cover up state agents' unconstitutional interference based on disdain for my exercise of freedom of conscience, religious beliefs, association, speech and the right to petition the government for grievances.



I object to my denial of Substantive and Procedural Due process rights by the State, the Board, and the Delaware Supreme Court, based on their disdain for my exercise of Constitutionally protected conduct, religious beliefs, religious exercise, political association, speech, association, and the right to petition the courts to address grievances, in this proceeding.

I object based on the Delaware Supreme Court's participation in inciting the petition against me. I am subject to a fatally biased decision-making process, or the appearance of a biased process, which is a cognizable constitutional injury sufficient to satisfy standing requirements.

I object to the fact the Board denied me the opportunity to be heard on my motions, dated December 18, 2021, December 31, 2021, January 15, 2022, January 25, 2022, and January 31, 2022.

I object to the fact the Delaware Supreme Court appointed counsel despite notice of my religious objection, and objection based on poverty in violation of my 6<sup>th</sup> Amendment Right to represent myself, and in violation of my First Amendment Freedom of religious exercise and beliefs.

I object to the Board's denial of opportunity to be heard, by denying me appealable orders, and for two determinations in an unappealable form essentially denying me a decision to appeal.

I object to the Delaware Supreme Court's involvement in inciting the petition and De-Lapp's attacks against me for the exercise of Constitutionally protected activity.

I object to the transcript as inaccurate. I asked to call Patricia Swartz as a witness at the inception of the hearing, which was not included in the transcript. The transcript does not contain my communications accurately. I filed a letter with corrections, corrections which do not correct all inaccuracies, which are incorporated herein as aforementioned, as Exhibit CC, and are incorporated in each reference to the Transcript.

The inaccurate transcript makes me appear ridiculous. I object to the State setting me up to look back. So many of the things the reporter wrote were wrong and weird. I note, she said she could not hear me, and she interrupted me but her transcription is deceitful.

For instance,

"On page 94, Last line. It should be "I got the answer" not "I got cancer.," Page 54, line 10 it should be "polluting" not "putting." Page 75, line 18 starting at line 17 "but I do love God and standing up for my faith" she typed "space" instead of "faith." Please delete "space." Replace it with "faith.," Page 113, line 9, Delete "killed." Replaced killed with "chilled." Delete "dimmed by." Replace it with "deeming me." Delete "being." Replace it with "by.," Page 114, line 17 delete 'head demonic' state. Replace it with "hegemonic" state., Page 120, lines 11 and 12, Please delete "bait." It should be risking people's bank deposits line 12 to "bait" is wrong. Please replace it with "banker's investments." I was trying to show you how banks lend out what is not theirs at a profit, creating money out of nothingness, at a

potential loss of the depositor's money. I think they can lend out 90 percent more funds than they have through their customers' bank accounts, essentially selling something the banks do not have, to make interest profit. Page 121, line 8, Delete "only hoping to heal." It should be courts "our only hope of a hero.," Page 122, line 5, Delete "green path and clear path." Replace it with "green pass and clear pass." Page 123, line 1, Delete "embattlement." Replace it with "battlefield.," 125 lines 20, Delete "signs." Replace it with "fines." Delete "or lure of." Replace it with "or award of." Page 125, line 21, Delete "justful offset." Replace with "Just laws that" Page 125 line 22-23, Delete "or discredit the importance and spend the focus." Replace it with "to teach people to care about people as opposed to unjust decrees. Page 128, line 7. Delete "diminished." Replace it with "de-minimus," Page 151 Line 14-19, I was referring to Duke studying Tobacco through grants teaching students and doctors to prescribe smoking, based on science to serve business greed, not good. I cannot restate what was said. I talked about how Businesses or charities funded colleges to make studies on research skewed towards their business purpose, like selling unhealthy tobacco by funding medical research, and buying the standard of care which worsened health., Page 152, 20-21, bad allergies protect me, line 20-21, Delete "firms" Replace with "farm's," Page 153 at 17 after the add "our hope of a" hero., Page 159 Delete "right." Replace it with "lives." So it should be "I filed *Kelly v Trump* when I realized eternal lives were at stake...., Page 163 line 1, Delete "thought." Replace with "brought a petition.," Page 163 line 13, Delete "space." Replace with "respect.," Page 165, lines 4, After be add "the mark of the beast," Page 165, line 6, Delete "with the Lord." Replace with "for reward or, avoidance of harm," Page 167 delete at line 9 "a sense" replace with "absence.," Page 170 I was reading the part of the petition at 7. Line 5 delete "so, we have agreed to suspend," replace with, "the weeds of greed stemmed.," Page 170 line 7, Delete "religious abhorrence" replace with "when it is religious whoredom." Page 170, line 17, Delete "market's abuse" replace with "mark of the beast.," Page 170, line 21, Delete "speaking with" replace it with "seeking.," Page 171 line 1 delete "and that" replace with "don't look at" people, Page 171, line 11, delete "itself" replace with "violates," Page 171 lines 13-14 delete "I've had a poor". Replace it with "to prepare, a fair," Page 172 line 4 delete, "reestablished" replace with "reached out to me," Page 177 line 13, delete

“the credit card.” Replace with “that I could use the company car.” I have religious objection to debt so this one is rather alarming to me.” Id.

I am defending my life, liberty and hard-earned active license to practice law here, and the reporter wrote space when I said faith, and head demonic when I said hegemonic state. I am defending my belief in Jesus, and my words are all twisted and inaccurate. The corrections I drafted were by means not all the corrections needed to make the transcription correct. This proceeding is fixed and unfair and prejudicial against me, in deprivation of my Constitutional right to free exercise of religion, speech, association, right to petition, and right to a fair hearing.

I should not be in trouble for seeking protection from the courts, when people are killing others based on political disagreement and religious beliefs in the United States of America. We had an attempted coup on January 6, 2021. I asked you for help and safety. I drafted five separate articles to impeach President Trump on, and contacted all 541 federal law makers to impeach him. I contacted other law makers on issues. A strangers got in my face in Bjs threatening me, based on perceived political religious beliefs. I don't know how they knew me. I think I got on the radar for contacting so many law makers. Even if the Court in *Kelly v Trump* found my case frivolous and found my religious beliefs and political beliefs based on love of humanity not sacrificing humanity for money and material gain, this case should still be dismissed, and the Board's decision must be rejected.

Even losers in Court have the right to petition. Half of all people would be denied access to the courts should winning be the requirement. I am not ashamed, and I do not regret standing up for my faith in Jesus from a government incited substantial burden, nor do I regret sharing my political beliefs, even if I am threatened with no protection from the courts. I would regret doing nothing.

I object on lack of subject matter jurisdiction over my person, due to lack of sufficient notice of the hearing, by insufficient of service of process.

This absence of fair notice deprived me of procedural due process, and the refusal to afford me an adequate opportunity to prepare and present my defense, despite my repeated requests violated substantive due process based on disparate treatment by the state against me based on the State's disdain for my political and religious beliefs and poverty.

Pursuant to Del. R. Civ. P. Super. Ct. 12 "(3) Whenever it appears by suggestion of the parties or otherwise that the Court lacks jurisdiction of the subject matter, the Court shall dismiss the action."

I object based on lack of proper notice of the hearing, in violation of my due process rights, which removes subject matter jurisdiction, making decisions void. "A judgment may also be void if a court "acted in a manner inconsistent with due process of law." *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760,

at \*3 (3d Cir. May 11, 2005). See Respondent's Exhibits to the Hearing ("R-Ex") Exhibits 35, 37 Part 2, 42, R 44.

Pursuant to Delaware Rules of Disciplinary Procedure Rule 9 (d)(3), "The Administrative Assistant shall serve a notice of hearing upon the ODC and the respondent, identifying the members of the Board assigned to the matter, and the date and place of the hearing. The notice shall be given **at least 20 days in advance of the date of the hearing**. The notice of hearing shall state that the respondent is entitled to be represented by a lawyer at the respondent's expense, to **cross-examine witnesses, and to present evidence.**" (Emphasis intended).

I was not afforded 20 days notice.

I objected to insufficient notice, and at no time waived such objections. I was not afforded an opportunity to gather, present evidence or cross examine witnesses. I merely received 18 days notice. Exhibits BB, CC.

I object to the Board's misleading comment concerning "lack of rebuttal" with regard to my objection to notice as a falsehood, asserted in bad faith. Report at 1. I presented the defense of lack of notice at the hearing, and filed a Motion to dismiss thereafter, on January 25, 2022, and incorporate my Motion to Dismiss Due to lack of Notice, as Exhibit B. Also see, Transcript of Hearing at 6-7, 136-

138, 142-144, 160-171, 174-175, 186, 193, with corrections to these pages. Exhibit W and Exhibit CC.

At all times I denied receipt of notice, and objected to lack of notice early on. See letter dated December 18, 2021, the Board regarding discovery, reconsideration on counsel, postpone hearing until counsel determination and discovery is complete including appeals, Objecting to Notice, Exhibit M, attached hereto, See December 20, 2021, *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection, of improper service of the Board's Notice of Hearing, dated December 10, 2021*), and filing dated, January 11, 2022, Exhibit N, Exhibits R and S, R-Ex 37 Part 2, R-Ex 35, R-Ex 42, incorporated herein in its entirety by reference.

I also indicated I intended to gather evidence, and perform discovery in December, prior to the December 30, 2021 Order allowing me to represent myself so as not to violate my 6<sup>th</sup> Amendment and First Amendment Constitutional rights. See R-Ex 37 Part 2, and R-40.

I asserted my objection to lack of notice immediately, and did not receive notice on December 10, 2021. I received notice on December 24, 2021, 18 days prior to the hearing, in violation of Del. Law. R. of Disciplinary Proc. R. 9(d)(2). I

made an error by saying 19 days because I added an additional day during the hearing. At no time did I waive notice.

The hearing was postponed 8 days, I did not receive proper notice by US mail of the hearing either. I made a special appearance and objected based on lack of notice. The lack of notice was prejudicial to my defense. I needed more time, and repeatedly requested more time, and was denied the opportunity for a fair and adequate opportunity to prepare and present my case. I was denied the opportunity to perform discovery, and now Patricia Swartz is not even working at the ODC. I desired to cross examine my accuser and even requested to do so, albeit I was fatigued, lacking of sleep and ill prepared for the hearing through no fault of my own, as I requested time, but was denied in violation of my substantive and procedural due process rights applicable to the state pursuant to the Fourteenth Amendment based on disdain for my case to protect my religious and political beliefs.

I object based on the State's fraud. Patricia Swartz lied about service of my answers to the petition to commit fraud to seek the case thrown out, by denying receipt after the deadline, to cause harassment and additional expense and duress against me in bad faith, in an attempt to kick out my answers based on fraud, as indicated in my letter dated December 1, 2022, to the Delaware Supreme Court incorporated herein by reference. R-Ex 27.



The state seeks to conceal the state's own misconduct, and due process violations in *Kelly v Trump*, and seeks to suppress my exercise of rights because it disagrees with my beliefs. Other than mistakes in pleadings, which happens to other attorneys, the State has no basis to place me on mental disability other than disagreeing with the way I think and believe, which is my Constitutionally protected right, to believe by the dictates of my conscience.

I object ,the state brings this case to for the impermissible purpose to punish me for the exercise of my fundamental rights, speech, association, petition, religious exercise, and freedom of conscience.

The state desires to punish me as unworthy of Constitutional rights because it does not want to be inconvenienced to protect me, because it disagrees with my religious or political beliefs, and the state seeks to punish me for my religious beliefs. See, Petition at 7, Report 32-33, (mental health examinations are against my religious beliefs); Report page 36-37; 68-71, 105-112 (Religious opposition to healthcare noted in); See, Exhibits Q, X.

The state unlawfully retaliated against me for the exercise of my Constitutional rights. I seek the means that will leave us all in the most improved position. The state will gain more respect and trust in justice when it grants justice to the least of these, even those it deems has religious views it detests.

I object, the State violates my First Amendment right to the free exercise of religion, speech, association and petition by indicating my religious beliefs, applicable to the state pursuant to the Fourteenth Amendment are evidence of a mental disability, because it disagrees.

I object that the state seeks to condition my license to practice law on the surrender of my protected right to exercise religious belief by forced violation of my religious belief, by requiring a mental examination opinion deeming me fit to practice law.

I object. The State cannot discriminatorily take away my active license to practice law because I exercised Constitutional rights, including the right to associate as a Democrat, a Christian, and as an injured party, petition, religious beliefs, speech which the State finds repugnant. Even a person with repugnant views, such as my belief you cannot serve God and money are protected from state interference, harassment, retaliation and punishment. The State is not above the law, above the Constitution.

I object to the report's assertions that my motions and Exhibits with the Board, the other documents included by the ODC's Exhibits to the Hearing are irrelevant. My freedom to speak on important political topics must be protected, just as other Americans with diverse political beliefs must be free to speak without

government persecution. My ideas help humanity, without sacrificing the few to serve the majority. My ideas are helpful. (Transcript at 43-44, 46-47, regarding the public will be harmed by diminishing my voice by threat of deactivation of attorney license, and to show I am “helpful, to the world, not harmful” 46-47, lines 11-47, 54-59, 131 “It is a loss to the public because I care to offer solutions to care for them like my newspaper [articles] to correct title insurance errors....my genuine concern about preventing and reversing the economic crash... “(Citing, transcript, page 131), “I am not a harm to the public. I’m a help, and there is no harm that I would create by looking to safeguard people’s interests.” Transcript Page 191)

My political beliefs are relevant as my case *Kelly v Trump* related to protecting my religious-political beliefs. The ODC asserts the reason for the petition is my pleadings in that case.

I object to the Board’s assertions Report on 4-5, that somehow my concerns for the baby boomers losing their retirement in a global crash, and regarding my concern for humanity above money and material gain are not relevant to show I am helpful, not harmful.

My pursuit of justice and support of the Constitution and the rule of law to safeguard individual liberties and the people who make up this country, beyond the

practice of law by my proposals, petitions, speech, association, and assertion of my rights are relevant and important to this matter, by showing I am helpful, not harmful to the public, and are at issue as an unlawful source of the state's persecution, disagreement with my political beliefs. Id.

My voice, my right to petition for relief, even for relief the state and courts disagree with are important and show that even minorities, and those with repugnant views are protected under our Constitution with the freedom to believe, exercise religious beliefs, petition, speak and associate without government persecution but for such exercise.

I object to the assertions of the Board that lack of faithfulness to the unconstitutional and lawless fancies of government agents, including Presidents Trump and Biden, including staff, members or the arms of the Chancery and Delaware Supreme Courts, Chancery Court staff Arline Simmons, Judge Kenneth Clark of the Court of Common Pleas, De-Lapp agents, as arms of the Delaware Supreme Court, Disciplinary Counsel Patricia B. Swartz, the Board, and even the unconstitutional acts of the Court, shows loyalty to my oath. (Report 120-193).

I assert I show loyalty to my Country, the Constitution, and the rule of law by standing up to the lawless, unconstitutional conduct by government agents who

violate my individual Constitutional liberties, and the rule of law, by teaching those in authority no one is above the law, nor is no one below the law.

I object even more fervently that the state appears to deem me disloyal to the law because of my loyalty to the Country, my individual, constitutionally protected religious beliefs in Jesus and religious exercise, and the Constitution.

Upholding the Constitution requires I hold government agents to the law when they act as traitors to the country and traitors to the Constitution by trading the Constitutional laws which protect liberty, which protect me, as a person, and by trading the people, land and resources by government agents who serve themselves by barter or exchange instead of serving their country. Serving the country requires government servants to lay down their selfish desires and convenience, to care for the people, while safeguarding their people's Constitutionally protected liberties, not enslave or sell the people as human capital to control. People are not for sale. They are priceless, not price tags or property of the state or country.

I object to the Report. The State also brought the petition to cover up its own misconduct, which is something to be ashamed of, not to be faithful to. Report 2. The oath of the lawyer is actual justice, not the appearance of justice. I believe the Court instills faith in the courts by seeking to uphold the individual liberties of the people, even attorneys, including me. I have not exchanged my Constitutional liberties in order to practice law by making money savior in place of Jesus.

(Transcript 190). My license to practice law was not exchanged by the State's elimination of my Constitutional rights, especially my religious beliefs in Jesus. I am not unqualified because money is not my God in place of Jesus. The oath to our country and Constitution is an oath to uphold my own Constitutional individual liberties to believe and worship and exercise faith in God, without government persecution or accusations that my faith in Jesus makes me mentally disabled. My poverty, and lack of resources even working computers does not make me unworthy to buy the no longer free exercise of Constitutional rights. Report at 4. Individual liberties are not for sale, and are not a matter of economics, as the World Economic Forum founder, Klaus Schwab, desires to make them to be in his stake holders system where people's souls, lives are exchanged for business greed, what I believe is the mark of the beast, those doomed to hell, without repentance.

If I am not able to exercise my religious beliefs, including sharing them openly without government punishment, then others are not either. Standing up for myself is standing up for others too, not allowing those in power to walk on those they are supposed to care for.<sup>19</sup> I should not get into trouble for having the

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<sup>19</sup> See ODC Ex 5, Complaint *Kelly v Trump*, *Kelly v Swartz*, See R-35, internal exhibit 5, Letter to the Court's regarding impartiality, internal Ex. 4 Letters to the Court regarding family law violating my faith in Jesus, internal Exhibit 3 Emails relating to forced violations of my beliefs by swearing in, Ex. 2, Complaint against Democrats, Ex.8, proposal concerning oil drilling, and 6 emails to Carper relating to preventing violence by education to prevent those who use God's name for war.

courage to correct President Trump's misbehavior in Court, to alleviate a substantial burden upon my religious exercise by the establishment of government religion through his enforcement of executive orders and misconduct. The government is not above the law.

I object to the Unconstitutional Board's recommendation of placing me on inactive disabled but for my religious beliefs or compelling me to undergo a mental examination, in violation of my religious belief, but for my religious exercise and beliefs and exercise of protected rights, in violation of the First Amendment applicable to the State pursuant to the Fourteenth Amendment, Procedural Due Process and Substantive Due Process Grounds, and, the Fourteenth Amendment Equal Protections Clause, applicable to me, as a party of one for discriminatory treatment.

I object to the report on Equal Protections and Substantive and Procedural Due Process Grounds applicable to the state pursuant to the Fourteenth Amendment for the State's discriminatory treatment against me. I object based on the State's denying me a fair opportunity to prepare and present a case, denying me of the opportunity to be heard, ignoring motions, conspiring with the Delaware Supreme Court to evade review by choosing not to render formal orders on motions, adopting the January 18, 2022 Supreme Court Order as permission in conspiracy to deny me an opportunity for appealable decisions, on the December

18, 2021, December 31, 2021, January 15, 2022, January 25, 2021, January 31, 2022, outstanding motions. (R- Exhibit 37 Part 2, R-Ex 46, and January 15, 2022 on the Record entitles, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*)

The Delaware Supreme Court's January 18, 2022 order evidences the Court made a decision before granting me an opportunity to be heard. The Board showed partiality to the state with regards to ignoring my requests for a list of the documents on record, prior to the hearing, ignoring my emails, ignoring my motions, and by unreasonably denying me the opportunity to perform discovery,



cross examine my accusers, or call witnesses, despite my formal requests, and their receipt of an E-mail dated October 26, 2021, alerting the State of my desire to call Chief Justice Collin Seitz as a potential witness. I object to the harsh treatment towards me, and to the misleading falsehoods of the Board. My formal motions to the Board were made to safeguard my fundamental rights, not focusing on illness, or the vulture issue. I object to the State's bad faith practice of denying or ignoring my religious objections against appointment counsel and mental examinations, which caused me sleepless nights, clenching of teeth, tears, and heart pain, and intentional infliction of emotional distress. I object on the cruel and unusual disparate treatment towards me, potentially violating the eighth Amendment, requiring I attend a hearing without adequate time to prepare to protect my most treasured free exercise of religious beliefs, due in part by the State's bad faith harassment. I was not feeling well during the hearing either.

I object to the State's false assertion brought in bad faith, that I did not seek time for discovery until shortly before the hearing. Report at 3. I requested time early on December 18, 2021, and December 20, 2022, before I received notice of the hearing on December 24, 2022. I object to the false assertion brought in bad faith, that I had ample time. I was not granted permission to represent myself until in or about December 30, 2021, and was required to file document after document to assert my rights. Report 3. The Board misleads this Court to abuse justice and

their power asserting the falsehood I waited until before the hearing to assert my right to seek discovery. I admit to E-mailing the state of my illness so as to prevent the spread of the dead during this global pandemic where the United States is rapidly approaching one million covid decedents, and over 80 million cases, but I object to the Board's a misleading assertion regarding illness and pests as my formal reasons to suspend the hearing had nothing to do with illness or pests, but more important assertions of my Constitutional liberties.

I did not have ample time to effectuate discovery, after filing an appeal on January 12, 2022, and another motion on January 15, 2022, and offices closed on January 17, 2022, with mail delays. There was no time. I did not even receive the Delaware Supreme Court's decision until January 18, 2022, days before the January 21, 2022 hearing.

I repeatedly asserted my right to seek time to afford an opportunity to prepare and present my case, including opportunity to perform discovery I was fighting for my eternal soul from the pits of hell from compelled violations of my religious beliefs, by appointment of counsel, for time to perform discovery, per the December 20, 2022 Motion before the Delaware Supreme Court, per my emails sent following up, per my Motions dated January 11, 2022, appeal January 12, 2022, Motion to expedite January 13, 2022, and Motion dated January 15, 2022. I at no time delayed in the assertion of my rights, but was forced to act, when the

State needlessly rushed to serve their fancies not the impartial rule of law, at the cost of violating my Due process rights, but for my religious beliefs, denying me a fair opportunity to defend my exercise of fundamental rights, denying me a fair and impartial opportunity to be heard. This was no hearing it was my hanging but for my belief in Jesus.

I object to the assertion that the state can take away a license for my exercise of Constitutionally protected activity, but for my exercise of Constitutionally protected activity. Report 4.

I object, during the hearing, the presider asked if witnesses were to be called. I asked to call Patricia Swartz as a necessary witness to cross examine. That was not reflected in the Hearing transcript. I did note my 6<sup>th</sup> Amendment right to cross examine my accuser, but my formal assertion was left out, ignored, like my unaddressed motions by the Board, dated December 18, 2021, December 31, 2021, January 15, 2022, January 25, 2022, and January 31, 2022, in violation of my Due Process right for an opportunity to be heard. (Transcript 96).

I am a Christian and a democrat, not acting as a professional attorney in the business of practicing law for money or material gain in the case or in *Kelly v Trump*. (Transcript page 113, Transcript 26, 81, 105-112, 162-164).

I have not practiced law in more than 6 years, and am no threat to the public. (Transcript 187). Instead, I am a help to the public, by my valuable freedom of thought and introduction of diverse ideas to care for them. (Report at 43-44, 46-47, 54-59, 131, 191.)

The State unlawfully brings this petition to cause great personal harm to me, by preventing me to gain work as an attorney, but for disagreeing with my political and religious beliefs, and Constitutional injury to me, in the form of penalizing me for the exercise of Constitutionally protected rights, and the right to a fair proceeding. (See, Transcript 77-79, 68-69, 107-111)

The State also unlawfully brings the petition to conceal state misconduct in violation of my Constitutional procedural and due process rights and equal access to the courts in violation of the Equal Protections clause of the Fourteenth amendment, but for disagreeing with my political and religious beliefs, and to deem me unworthy of protection due to indigency. (Report 146-149).

After, completion of *Kelly v Trump*, I intended to renew negotiations to rejoin my former law firm, if they still were interested in me after the ODC's actions. (Transcript 77-79, 135, 177).

I am unemployed and indigent. (Transcript 187). Going into debt violates my religious beliefs. (Transcript 114-124). My family, like many others are facing

harder times, during the pandemic. The State's petition prevents me from rejoining my old law firm. I hoped to use my former firm's company car. So, I could give my car back to my father. Since it appears he needs a car.

Please note, I asked the Board of Bar examiners for help when my ceiling caved in by a leak which ruined bar material as I studied for the Delaware Bar. I was punished back then for asking for help too. (Transcript 34). The government should not punish those who have grievances against government agents, or diminish their alleged grievances by the insulting, inflammatory assertion that those who disagree with the state are disabled.

This pattern of state punishment of victims to protect the image of the state is dangerous to public safety.

I object to lack of notice of the hearing, which is a denial of Due Process rendering this action without jurisdiction.

I object based on the State's Violations of the Equal Protections Clause, and Substantive and Procedural Due Process Clause based on discriminating against me based on my religious, political beliefs, association and poverty, by denying me equal access to the courts, notice, a fair opportunity to prepare a defense, to perform discovery, to subpoena witnesses, to cross examine my accuser, denying me an opportunity to be heard on appeal by colluding with the Delaware Supreme

Court to refuse to render orders, or apparently making decisions before I am heard with regards to the Delaware Supreme Court's January 18, 2022 order.

I object to the denial of due process rights by the Board and the Delaware Supreme Court in this action.

The State applied the Delaware Lawyer's Rules of Professional Conduct unlawfully, as applied to me, in violation of my Constitutionally protected conduct, most importantly my freedom of thought and free exercise of religious beliefs without government persecution, for an unlawful purpose to cover of state wrongful behavior. I object to the misleading assertion on page 4 of the report mischaracterizing why I believe the Disciplinary rules, are disparately applied to me. The rules are unconstitutional applied to punish me for exercise of fundamental rights, without justification in terms of a compelling interest, narrowly tailored to meet the interest in the least restrictive means that is somehow more important than the exercise of my religious beliefs, religious exercise, political beliefs, political affiliation, speech, right to associate and right to petition. There is no compelling interest.

The ODC unlawfully brought the petition, as applied, with no legitimate purpose, to conceal lawless acts by the State and Delaware Courts, and to disparately condemn my religious, political speech and petitions against government agents, and their peers, in violation of my First Amendment protected

Constitutional exercise of rights and in violation of my Due Process Rights by denying me a fair and impartial trial in a fixed proceeding.

I was denied a fair opportunity to research, perform discovery, subpoena witnesses and defend my exercise of Constitutional exercise of rights before the Board. I did not have time to mail out requests for subpoenas and discovery, but was forced to defend my 6th Amendment right to represent myself. On December 18, 2021, December 20, 2021, December 29, 2021, I made my desire for time to perform discovery known so I may have a fair opportunity to prepare and present my defense.

I followed up on my December 18, 2021 motion which was not entertained by the Board, nor was my motion dated December 31, 2021, nor was my motion dated January 15, 2022, motion dated January 25, 2022 or my motion dated January 31, 2022. The Board needlessly rushed the proceeding in collusion with the Court and the ODC, to come up with a predetermined fixed ruling, denying me of my Due Process rights. I object to the Board's assertion, I had time, when I was not afforded a fair opportunity to prepare and present my case, or an opportunity to be heard on appeal or on motions. The Board sat on my motions, and has unclean hands, by committed laches, as I sought to imperfectly, swiftly assert my Constitutional liberties to prevent waiver.

The state brought the case to protect its appearance of justice to cover up its own wrong doing by interfering with my due process rights and my equal access of the courts in violation of the Due Process Clause by discriminating against me for my religious, political beliefs, religious-political association, speech and petitioning of the courts. by creating injustice and violations of the constitutional protections as applied to me, which is unjust.

The courts duty is to seek to uphold justice, not appearance for the profit of a profession. I was not acting as a business professional, attorney, working for money, when I filed *Kelly v Trump* as a party. My loyalty to my God and safeguarding my individual Constitutional liberties is more important than the profit of a profession. The Constitutional freedoms, are free, and not for sale or exchanged for my license to practice law by my mere association as an attorney, with whom the state disagrees on matters of freedom of conscience.

I object, the State violates my First Amendment right to the free exercise of religion, by conditioning my license to practice law on the surrender of my Constitutionally protected right to free exercise of religion and freedom of conscience by forced violation of my religion and tightly held beliefs, which the state disagrees with by seeking a mental examination opinion deeming me fit to practice law.



The State violates my First amendment right, applicable to the state pursuant to the Fourteenth Amendment, in that State conditions my license to practice law, on the surrender of my free exercise of religious beliefs, and freedom of conscience, with no least restrictive alternatives, based on an unconstitutional purpose, their disagreement with my religious beliefs and their desire not to be inconvenienced with someone who believes differently.

The State cannot discriminatorily take away my active license to practice law because I exercised Constitutional rights, including the right to associate as a Democrat, a Christian, and as an injured party, petition, religious beliefs, speech which the State finds repugnant. Even a person with repugnant views, such as my belief you cannot serve God and money are protected from state interference, harassment, retaliation and punishment. The State is not above the law, above the Constitution.

The state has no authority to force me to be examined by a mental health professional or declare me mentally disabled because of my belief in Jesus, an illegal, unlawful purpose. I have "the mind of Christ," as opposed to the mind of the world, the antichrist, like most of humanity. Most humanity has the mind of the antichrist, with thoughts that violate Christ's teachings. Most people do not have eternal life.

The State has no authority to declare me mentally disabled because my poverty causes an inconvenience to the state as I exercise fundamental rights, including seeking to defend my exercise my right for an opportunity to defend myself against the state's accusations. Other claimants with diverse religious beliefs seek remedies to safeguard their religious beliefs and exercise before the Courts, usually with an attorney advocate to represent them.

The State disparately, discriminatorily mistreats me as a pro se litigant, unrepresented by an attorney, because the State disagrees with my religious beliefs, my petitions to defend my religious beliefs and does not want to be inconvenienced to grant an opportunity of justice to me, in violation of the Equal Protections Clause.

The State and the Delaware Supreme Court unreasonably, discriminatorily, without justification violated my due process rights, denying me the right to a fair and impartial hearing, denying me of the opportunity to be heard.

My belief in God, the father, son and the holy spirit is the most important thing in my life. I am reasonable shaken up by the state's shockingly discriminatory treatment of me, but for, my exercise of religious beliefs, and constitutionally protected activity of petitioning the Courts to alleviate a

government incited substantial burden upon my religious beliefs, by suing President Donald J. Trump under The Religious Freedom Restoration Act.

I object to the report's assertions that my pursuit of justice and support of the Constitution and the rule of law to safeguard individual liberties and the people who make up this country, beyond the practice of law by my speech, association, petitions, and assertion of my right to defend myself and my exercise of fundamental rights with the state's discriminatory persecution in violation of the Equal Protections Clause, and violations of my substantive and procedural due process rights is somehow irrelevant or unimportant to this matter.

My political beliefs are a reason of government persecution. My political beliefs are also relevant to the matter to show my voice, as a person is important to the community and the country.

I seek to make an unjust government more just. I sought justice differently when the government, and the ODC did not want to be inconvenienced with correcting lawless conduct by out of state Title Companies who practiced law without a license, sometimes making errors in the chain of title. That is when I looked into running for office, only to discover corruption by partiality inherent in a system encouraging injustice with the allowance of donations, or signatures to back candidates, when the vote is the only free, fair form which should be used.

I object to the nonsensical, pompous, unconstitutional assertions of the board that lack of faithfulness to the unconstitutional and lawless fancies of government agents, including staff, members or the arms of the Chancery and Delaware Supreme Courts, Chancery Court staff Arline Simmons, Judge Kenneth Clark of the Court of Common Pleas, De-Lapp agents, as arms of the Delaware Supreme Court, Disciplinary Counsel Patricia B. Swartz, the Board, President Trump, President Biden, and even the unconstitutional acts of the Court, shows loyalty to my oath. Report at 2. I assert I show loyalty to my Country, the Constitution, and the rule of law by standing up to the lawless, unconstitutional conduct by government agents who violate my individual Constitutional liberties, and the rule of law, by teaching those in authority no one is above the law, nor below the law.

I object. The State's petition was brought under the Delaware Rules of Disciplinary Rules for an impermissible unconstitutional discriminatory purpose, to punish me for the exercise of rights, the state may not punish me for, no matter how much they disagree with my positions, religious beliefs, and beliefs of conscience. It is insulting to me and my God, Jesus, that the state finds my religious beliefs a mental disability. This is an impermissible finding. The State is not above the law.

I object even more fervently that the state appears to deem me a traitor, or a danger, an enemy of the state, disloyal to the Constitution because of my loyalty to

the Country, my individual, constitutionally protected religious beliefs in Jesus and religious exercise, and the Constitution. Upholding the Constitution requires I hold government agents to the law when they act as traitors to the country and traitors to the Constitution by trading the Constitutional laws which protect me, as a person, the people, land and resources, from being traded away by government agents who serve themselves instead of serving their country. Serving the country requires government servants laying down their selfish desires and convenience, to care for the people, while safeguarding their people's Constitutionally protected liberties, including their freedom of conscience, not enslave or sell the people as human capital to control.

Exchange the term traitor to the country with trader of the country's people, land and resources, and you may begin to understand how our misguided leaders, such as President Trump and President Biden violate their oath to safeguard individual liberties and the people, by becoming traitors, by trading the people and their individual liberties to partners. Per my Complaint *Kelly v Trump*, I outlined my religious beliefs that partiality is the root of corruption, making leaders misleaders who behave as servants of self like Satan, serving those who serve them thereby serving themselves, not servants of the country and the people.

Partnerships with organizations, entities, countries, and the UN blinds the government agents' eyes from seeing clearly to care for the people in the country.

I realize the root of this government corruption is the love of money driving out loyalty to the Constitution, and loyalty to care for the people government workers are charged to care for. I believe the way money is coined violates the Constitution, and guarantees the elimination of freedom.

In 1913, the Federal Reserve, a private bank was delegated government authority to coin money out of debt with interest. The way money is coined is by eliminating freedoms, through involuntary servitude, by artificially creating debt out of nothingness to control the people. The worse off America and the people are by debt, the more profit the Federal Reserve earns, and the more debt control the Federal reserve has over the people and the government. The government must take control of coining the money to care for the people by coining it without debt or interest to pay back all debt to prevent an overthrow of our government and the elimination of Constitutional liberties we all hold dear. There is a plan to overthrow our governments authority to govern, and to eliminate fiat currency

There is a plan to eliminate Constitutional freedoms, to make the people no longer free, but for sale, to be rented out, in violation of the 13th Amendment. Our leaders behave as traders of their country, people and land by their loyalty to partnerships, including the plans under the Fourth Industrial Revolution, the Covid 19-Great Reset, and the Great Narrative.

I alert this Court to the plan to eliminate fiat currency and the dollar, to a borrowing economy, where “no one owns anything.” Ans-Ex 19.

If leaders loved their country, they would not destroy it with violence, or sell its people’s labor by artificial indebtedness in violation of the 13th Amendment, or its resources for money. The country after all is the people. If you destroy your people for money that is opposite of serving your country, that is leaders selling their country to serve themselves.

The planned, preventable elimination of the dollar and crash of the economy is reversible by this Court. Do not despair when it occurs. Congress and the President are not going to reverse an economic crash, unless this court balances their power and makes them. They will lose more control by coining money to care for the people without debt and interest, but it will safeguard our union, while safeguarding people’s freedom from bondage. It is the only way to reverse the economic crash. Your love of humanity must be more important than money. You are our hope of a hero. Money is not the hero, it is individuals like you who may choose to reflect the image of God, by unearned, required, unconditional love for humanity. You are our hope of a hero, even though I am not happy you persecute me for my faith in Jesus.

I object to the Report. The State also brought the petition to cover up its own misconduct, which is something to be ashamed of, not to be faithful to. Report 2. The oath of the lawyer is actual justice, not the appearance of justice. I believe the Court instills faith in the courts by seeking to uphold the individual liberties of the people, even attorneys, including me. I have not sold their soul to hell in order to practice law by making money savior in place of Jesus. My license to practice law was not exchanged by the State's elimination of my Constitutional rights. I am not unqualified because money is not my God in place of Jesus.

I object to the Unconstitutional Board's report recommending placing me on inactive disabled but for my religious beliefs or compelling me to undergo a mental examination, in violation of my religious belief, but for my religious exercise and beliefs and exercise of protected rights, in violation of the First Amendment applicable to the State pursuant to the Fourteenth Amendment, Procedural Due Process and Substantive Due Process Grounds, and, Equal Protections Clause, applicable to me, as a party of one for discriminatory treatment, as set out in the proposed Order attached hereto

I object pursuant to Del. R. Civ. P. Super. Ct. 45 (c) (B)(2) and (c)(3)(ii)(iii), to the state forcing me to violate my religious beliefs by undergoing a mental professional examination or lose my active license to practice law, but for, my religious beliefs, and move to quash potential subpoenas and vacate the Board's



decision threatening to place me on inactive mentally disabled or force me to violate my beliefs by gaining mental examinations affirming my fitness decision, renew my Motion for a protective order, incorporated herein by referenced, and move to vacate the Board's order pursuant to Del. R. Civ. P. Super. Ct. 60.

I object to the misleading assertion on page 4. I believe the State applied the Delaware Lawyer's Rules of Professional Conduct unlawfully, as applied to me, in violation of my Constitutionally protected conduct, most importantly my freedom of thought and free exercise of religious beliefs without government persecution.

I object to the assertion that the state thinks it can take away a license for my exercise of Constitutionally protected activity, but for my exercise of Constitutionally protected activity. Report 4.

The State neglects to understand that its ability to limit my license cannot violate the Constitution or the Rule of law, based on my exercise of Constitutionally protected rights, including the right to defend my exercise of First Amendment rights at a hearing. The Court may not blindly violate the Constitutional safeguards I assert for the convenience of the court.

I am not ashamed of my limited resources or my poverty or broken computers, which sometimes do not work. I should not be penalized for my poverty by forced eliminations of my fundamental rights for the fancies of the

state. The state seeks to maintain my poverty by taking away my ability to work as an attorney. The fact I do not have nicer things that work well should not be held against me, as I am not practicing law and have not practiced law for years. Once I am practicing law, I will be given equipment that works better.

I object to the Board's cold-hearted assertions on page 4-5 of the Report, that somehow my concerns for the baby boomers losing their retirement in a global crash, regarding my concern for humanity above money and material gain.

I object to the State's assertion I only had two objections. I quickly added a third objection, and added additional objections without numbering them throughout the hearing. See Transcript at 9, and complete transcript.

I object to the State's and the Delaware Supreme Court's collusion and conspiracy to unreasonably discriminatorily violate of my procedural and substantive due process right to be heard, right for an opportunity to prepare and present my defense.

I object to the Board's and the Delaware Supreme Court's denial of my procedural and substantive due process rights, making this proceeding void.

WHEREFORE, this Court must grant my motion to vacate and overrule the Board's decision and enter the attached Order.

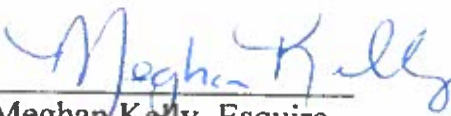
1. overturning the Board's decision,

2. declaring me fit to practice law, without restrictions or encumbrances.

3. Dismissing this action

March 21, 2022

Respectfully submitted,



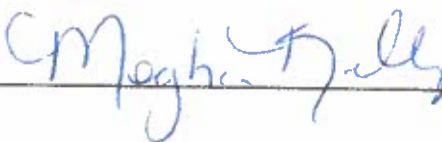
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Unrepresented indigent party,  
Not acting as attorney advocate  
Bar No. 4968 (34,303)

I declare, affirm that the foregoing statement is true and correct under the penalty of perjury.

Dated:

Meghan Kelly (printed)

 (signed)