

# Appendix S

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	No.: 1:21-cv-01490-CFC
	)	
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B.	)	
Swartz, et al.	)	
Defendants.	)	

**Plaintiff's Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2)  
to include additional parties, eliminate a party, include additional facts and include  
additional requests for relief**

Plaintiff Meghan Kelly, Pro se, January 24, 2022, brings this motion pursuant to FRCP 15(a)(1) and FRCP 15 (a)(2) to amend the complaint to include additional plaintiffs, Delaware Supreme Court, a.k.a., Supreme, Court State of Delaware, Justice Gary F. Traynor, in his official and individual capacity, pursuant to *Ex parte Young*, Justice Karen L. Valihura, in her official and individual capacity, Chief, Justice Collins J. Seitz, Jr., in his individual and official capacity, Justice James T. Vaughn, Jr., in his individual and official capacity, Justice Tamika R. Montgomery-Reeves, in her individual and official capacity, to eliminate a party, Preliminary Investigatory Committee, include additional facts, and include additional requests for relief.

1. The Supreme Court members participated in the subject of the petition of the Board, *Kelly v Trump*, three of the justices rendered an order in that case, Justice Gary F. Traynor, Justice James T. Vaughn, Jr., Justice Tamika R. Montgomery-Reeves.
2. The Defendants allege in the August 23, 2021 letter that the pleadings in that *Kelly v Trump* are the source of Defendant's investigation.
3. I brought the petition to protect my free exercise of religious beliefs under RFRA to safeguard my life and liberty from government incited private and government sponsored persecution. I also brought two petitions for relief from attorney dues.

4. The source of De-Lapps attacks against me was my request for waiver of attorney dues addressed to Chief Justice Seitz and the Delaware Supreme Court. The second request was ignored by the Supreme Court, affording no opportunity to be heard.

5. The entire court may have reviewed the petitions relating to attorney dues.

6. Since, a proceeding before the Board begun, the Supreme Court conspired with defendants to deny me of a fair and impartial opportunity to defend my exercise of fundamental rights at a government compelled rushed secret hearing.

7. I was denied the opportunity to recover from not feeling well, compelled to attend a hearing with little sleep, and while ill, due to allergies. Defendants do not care about health, but care more about material gain at the cost of human health and life, my health and life and liberty.

8. I was denied the opportunity to call witnesses, gather evidence, research, use such evidence to present motions or to present a defense, and cross examine witnesses.

9. I was denied the opportunity to appeal decisions by the Court's conspiracy to collude with the Board, by signaling to the Board to render decisions to my motion in a non-appealable form. The Board made a determination via an informal unsigned email.

10. I was denied adequate notice of the hearing, 19 days as opposed to 20 days. I objected and reserved my objection.

11. The Delaware Supreme Court is partial to the state, and is incapable of providing a fair opportunity to be heard or a fair proceeding.

12. The Supreme Court made a decision on my defense prior to the hearing, denying me a fair opportunity to be heard, by deeming my request to research, gather evidence to prepare and present my case as frivolous, means the Court finds my defense of 1. lack of subject matter

due to illegality of proceeding, as applied to me, disparately brought to punish me for my religious beliefs and exercise of protected conduct, 2. Lack of subject matter jurisdiction due to the fact the Supreme Court is a partial forum.

13. The Supreme Court incited and contributed to the Defendants' attacks and the petition brought against me. The Supreme Court's members include necessary witnesses, specifically Chief Justice Seitz.

14. The Defendants knew I desired to subpoena Chief Justice Seitz back in October 26, 2021. (See Exhibit A.)

15. The Supreme Court agents or members are the apparent instigators of the petition brought to punish me for my religious beliefs, or poverty, and exercise of protected conduct.

16. The Defendants seek to further compel me to violate my religious beliefs, by examination. I object to examinations on religious grounds, and should not be forced to violate my faith, because Defendants attack my faith as a mental disability. Defendants do not meet strict scrutiny.

17. I am in immediate danger, and every day the threat of additional danger increases.

18. Sadly, it appears I cannot at this time remove David White or Kathleen Vavala as they appear to be participating in the unlawfully brought proceeding against me.

19. I am removing the Preliminary Investigatory Committee in the Amended Complaint. I am also including nominal damages, requesting declaratory relief, a writ of mandamus, additional counts, and more explicitly asking for damages relating to emotional distress.

20. Defendants compelled me to attend the hearing when I was too tired and not feeling well to perform well. Defendants do not care about health or liberty just power.

21. I am so tired. I am sorry I do not have time to tailor the complaint, due to the continuous, immediate irreparable additional injuries, I continue to face. I remain in danger. Please help me.

22. Attached, please find a blackline of the changes listed as Exhibit B, and the Amended Complaint listed as Exhibit C.

22. The Defendants are not prejudiced, since service has not even been brought for the original complaint, and no attorney has made their appearance yet.

23. The attorney has notice of the additional parties as I mentioned I sought to include them in my last two motions.

Wherefore, I pray the Court grants my motion as justice requires.

Dated: January 24, 2022

Respectfully Submitted,



/s/Meghan Kelly

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
Pro se, not attorney  
(Word Count 911)  
meghankellyesq@yahoo.com  
Bar Number 4968

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

Dated: January 24, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

## Appendix T

**FOR IMMEDIATE RELEASE**  
**November 29, 2022**

**Justice James T. Vaughn, Jr. announces he will retire on May 1, 2023 after 25 years of service on the bench**

The Honorable James T. Vaughn, Jr. informed Governor John Carney today of his intention to step down from his position as a Justice of the Delaware Supreme Court effective May 1, 2023.

In his letter to the Governor, Justice Vaughn wrote, “It has been an honor and a privilege to serve since 1998 as a Superior Court judge and Supreme Court Justice. I will always appreciate the memories of working with my colleagues on the bench and with court staff in our efforts to maintain the rule of law in this state. I leave with a sense of satisfaction that I have done my best to discharge the duties of the judicial offices I have held.”

Justice Vaughn, 73, first joined the bench in 1998 as the Resident Judge for Kent County Superior Court. He was later elevated to the position of President Judge of Superior Court in 2004. Gov. Jack Markell then appointed him to the Supreme Court in October 2014.

“Like his father, Justice Vaughn has served our State and its citizens with great distinction,” said Delaware Supreme Court Chief Justice Collins J. Seitz, Jr. “As former Chief Justice Veasey has remarked, Justice Vaughn has a straight-forward/no-nonsense approach to the Rule of Law. The Court will miss his hard work, steady hand and unflappable nature.”

Prior to joining the bench, Justice Vaughn spent 22 years as an attorney in private practice in civil and criminal law, first at Vaughn & Vaughn, in 1976, then at Vaughn and Nicholas before joining the firm of Schmittinger and Rodriguez in 1988.

Prior to joining the bench, Justice Vaughn also served as a member of the Clayton Town Council from 1979 – 1989, including three years as President. He was then elected to the Smyrna School Board, serving from 1989 – 1994, including three years as that board’s president.

Justice Vaughn, a U.S. Army veteran and Delaware native, received his B.A. from Duke University, graduating *magna cum laude* in 1971 and his J.D. from Georgetown University Law Center in 1976. He graduated from J.B. Moore High School in Smyrna in 1967.

Justice Vaughn is a member of the Kent County Bar Association, Terry-Carey American Inn of Court (President 2011-2013) and The Randy J. Holland Workers' Compensation American Inn of Court. He served as a judicial member of the Joint Bar/Bench Committee on Civility and as a member of the Judicial Ethics Advisory Committee.

**FOR IMMEDIATE RELEASE**  
**December 16, 2022**

**Justice Tamika Montgomery-Reeves announces she will step down  
in February to join the U.S. Third Circuit Court of Appeals**

The Honorable Tamika Montgomery-Reeves informed Governor John Carney this week that she will be stepping down from the Delaware Supreme Court in early February 2023 in order to accept her nomination by President Joseph R. Biden, Jr. to the U.S. Third Circuit Court of Appeals.

“It has been an extraordinary honor and privilege to serve the people of Delaware for the past seven years,” wrote Justice Montgomery-Reeves in her letter, delivered to the Governor on Dec. 15, 2022. “I also am incredibly fortunate to have spent this time working with dedicated judicial officers and staff who are committed to the rule of law and to treating all who come before them with dignity and respect. I have learned so much from them, and their service to Delaware has inspired me.... I look forward to continuing to serve the people of Delaware on the federal court.”

The U.S. Senate voted to confirm Justice Montgomery-Reeves to the U.S. Third Circuit Court of Appeals on Dec. 12, 2022. Her departure from the Delaware Judiciary will coincide with President Biden signing her commission to the U.S. Third Circuit, which has not yet been set but is expected in early February.

“While we are saddened to lose a valued colleague on the Delaware Supreme Court, we are happy for her and for the Federal Judiciary,” said Delaware Chief Justice Collins J. Seitz, Jr. “The Third Circuit is gaining a judge of uncommon intellect and wisdom. I am particularly thankful for her work on the Delaware Judiciary’s strategic plan to improve the diversity of the Delaware Bench and Bar.”

Justice Montgomery Reeves was a trailblazer in the Delaware Judiciary. When she took office as a Vice Chancellor in Nov. 2015, after her appointment by Governor Jack Markell, she became the first Black woman (and the first Black person) to serve on the Delaware Court of Chancery. She again made history when she was elevated by Governor Carney to the Delaware Supreme Court in 2019, becoming the first Black person of any gender to serve on the state’s highest court. “I remain extremely grateful to you and former Governor Markell for entrusting me with that awesome responsibility,” wrote Justice Montgomery-Reeves.

Prior to her appointment, Justice Montgomery-Reeves was a partner in the Wilmington, Delaware, office of Wilson Sonsini Goodrich & Rosati, focusing on corporate governance, navigation of corporate fiduciary duties, stockholder class action litigation, derivative litigation, and complex commercial litigation. Before that, Justice Montgomery-Reeves practiced in the securities and corporate governance department of Weil, Gotshal & Manges LLP in New York.

While in private practice, Justice Montgomery-Reeves served on a subcommittee of the Delaware Supreme Court’s Access to Justice Commission and on the Delaware Court of Chancery’s Rules Committee. She also received recognition for her contributions to pro bono service. In her

community, Justice Montgomery-Reeves serves as a member of the Delaware Community Foundation board of directors. Justice Montgomery-Reeves also served as a member of the Mother Teresa House, Inc., board of directors.

Justice Montgomery-Reeves graduated from the McDonnell-Barksdale Honors College at the University of Mississippi in 2003. She received her law degree in 2006 from the University of Georgia School of Law. Justice Montgomery-Reeves served as a law clerk for Chancellor William B. Chandler of the Delaware Court of Chancery.

## Appendix U

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive  
Dagsboro, DE 19939

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

RE: Kelly v Swartz, Appellate Court No.: 21-3198/ No. 22-2079/ District Court No.: 1:21-cv-01490-CFC/Strike last paragraph of letter filed August 13, 2022 at 3DI-74, that letter is for information purposes only

August 13, 2022

Dear Honorable Clerk of Court :

On August 13, 2022, I sent this Court and opposing counsel a letter regarding an Order against my license (the “letter”).

Please strike the last paragraph of the letter “This is not a motion. It is my duty under Rules of Attorney Discipline Procedure Enforcement, Rule 6.”

While the letter was only for informational purposes, I desire to merely inform the Court in my case, in case my electronic filing privileges be removed, as they were removed in the Delaware District Court, which would affect service by and to the court, in this case.

Desiree at the Third Circuit indicated Pam, my case manager is on vacation this week. So, this letter has not been transmitted to the Clerk’s office yet. I desire

to prevent this letter from being transmitted to the Clerk. I do not waive my right to invoke the 5<sup>th</sup> Amendment against self-incrimination.

I intend to file the attached letter with the Court, and hope to litigate the issues contained in the motion hereto, among additional issues, in state court.

I am sorry for the inconvenience. I am in trouble for standing up for myself and my religious beliefs against state incited persecution. If I do not timely assert my rights, they may be deemed waived.

I assert my 5<sup>th</sup> Amendment right against self-incrimination at the threat and apparent guarantee I will be prosecuted against.

Thank you for your kind consideration.

August 16, 2022

Respectfully Submitted,

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

## Appendix V

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY, ) Case No 21-3198  
 )  
 v. ) Case No. 22-2079  
 )  
 PATRICIA B. SWARTZ, et. al. )

Respondent Meghan Kelly's Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay

I, Respondent Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), respectfully request this Court strike DI 77, and give the physical documents to Desiree's team to be uploaded for Matter No 22-8037, while reserving my motion for a stay.

1. On or about Monday, August 22, 2022, I contacted the Third Circuit to speak with the case manager Desiree regarding 5 separate mailings coming in for a reciprocal disciplinary matter.

2. I learned Desiree, the case manager, is on vacation until August 30 or 31<sup>st</sup>.

3. I called the Third Circuit and spoke with a representative to alert them that mailings were coming in for the disciplinary matter, not the civil rights suit brought because of the wrongful disciplinary proceeding against me.

4. Representatives confirmed they would be on the lookout for mailings and would not place them on my civil rights case.

5. I emailed Pam, my case manager to alert her that I had mailings coming to the Third Circuit. I asked her not to file these mailings for the disciplinary matter in the Civil Rights proceeding.

6. Pam confirmed Desiree's team were looking out for my mailings.

7. Despite my attempts to prevent documents relating to a confidential proceeding from being uploaded on the wrong case publicly, on August 24, 2022, a letter for the disciplinary file was uploaded onto this matter by mistake at DI 77.

8. There are a total of five separate mailings I have already sent out which should be in the Third Circuit's possession, with even more DI items to be uploaded in the separate disciplinary matter.

9. Please do not upload those on 21-3198.

10. Please strike DI 77, as uploaded in error.

11. I note with prejudice that the order is easy to read. Whereas my attachments are lighter and harder to read. This is quite prejudicial by placing me in an unfavorable light.

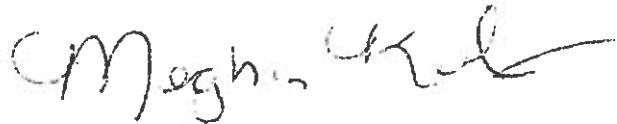
12. Please transfer the physical items to be uploaded by Desiree's team in a less prejudicial manner for the disciplinary matter.

13. Thank you for your time and help.

Wherefore I pray this Court grants my motion to strike DI 77, and transfers the physical documents to the correct case manager and matter number.

August 24, 2022

Respectfully Submitted,



/s/Meghan Kelly

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 4968 DEACTIVE(364)

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

Dated: August 24, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

## Appendix W

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY, ) Case No 21-3198  
 )  
 v. ) Case No. 22-2079  
 )  
 PATRICIA B. SWARTZ, et. al. )

Petitioner Plaintiff Meghan Kelly's Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay

I, Petitioner, Plaintiff Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), respectfully request this Court strike third Circuit Docket Item DI 77, and give the physical documents to Desiree's team to be uploaded for Matter No 22-8037, while reserving my motion for a stay. (3DI 78) (Third Circuit Docket Item is referred to as "3DI." Delaware District Court Docket Item is referred to as "DI" herein. All DI's and 3DI's mentioned in this motion, are incorporated herein by reference in their entirety, including subparts, even if not separately noting subparts, as if fully restated herein)

1. I filed a Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay. (3DI 77-78)

2. Since then, I discovered this issue is too important. Justice and equality for all must be upheld.

3. Injustice for the poor appears to be the manner the courts behave, if the manner courts have conducted themselves towards me is the same manner of all in forma pauperis pro se clients, which is not acceptable. This needs to be corrected, without punishment, with improvement.

4. When I first starting receiving Court filings through email, by the Third Circuit for matter 21-3198, I received another person's confidential *in forma pauperis* filing relating to financial information and alleged crime. (3DI 6) I notified the Court.

5. When people plead for help to the Court, they often share their most heartfelt sensitive requests. To heartlessly, carelessly not review it, when the court usually seals this, and send it to another person, shows this court cares more about money, doing a job, convenience, not the people they serve who petition this court for help.

6. The Courts' duty is to serve justice, not greed by focusing its eyes on productivity, avoidance of costs and convenience exchanged for the cost of selling souls, individuals and individual liberty for government and government backed private or foreign partners' interests.

7. In the District Court below, no one told me there was a corrected complaint filed, until months later, after it came to my attention. This caused

confusion, additional motions and a material reliance by the Delaware District Court judge below, which appeared to be in bad faith. (DI 2, 43, 61, 3DI 50, 51-57)

8. Defendants provided me with the misfiled complaint on January 31, 2022. It appears the public has access to the misfiled complaint, missing the request for damage relief, contained on the signature page. (DI 2, 61, 62, 3D-51).

9. On or about May 3, 2022, I filed Appellant Plaintiff Meghan Kelly's Motion Directing the Delaware District Court to correct the Complaint to include the signature and listed damages for relief so as not to mislead the public, attorneys and appellate Courts.

10. I filed a motion to publicize the corrected complaint after Sam told me she corrected it, and it remained unavailable to others, including Defendants. (DI 61, 62-65, 3DI 51-57)

11. I also noticed pages appeared to be missing in DI 4, since, there was a break in pages. This led me to believe additional documents may be missing from the record.

12. I also saw the Exhibits were listed out of order from the table of contents and the paper copies I submitted before the Delaware District Court. (DI 4)

13. When I arrived to drop off the paper copies, the staff at the Delaware District Court required I give them electronic copies. I complied, but did not

waive my right to make the record appear as my original paper pleadings showed. I filed a letter with the court confirming I required my pleadings appear accurate on the record. (DI 18)

14. In addition, I have expended additional funds to provide the Delaware District court with additional memory sticks for bigger pleadings, along with paper copies at times. (DI unavailable)

15. In January 2022, I made a four hour round trip to pay for filing privileges with the Delaware District Court since staff would not permit me to pay over the phone or electronically.

16. The Delaware District Court withdrew my paid for filing privilege upon receipt of the Delaware's Order, without granting me notice or an opportunity to be heard on this property right which foreseeably prejudices my in the cases before its courts.

17. On August 13, 2022, I mailed a motion to regain electronic access to the Delaware District Court.

18. Sam, a staff member at the Delaware District court, allegedly misfiled Complaint, and corrected it on October 27, 2022. She did not tell me, at the time of correction or soon thereafter. She confessed when I filed pleadings about it, months after the correction. Id.

19. I recall, with great sadness and horror speaking with Sam on the phone as I tried to get an understanding of what was on the docket. I indicated I may file a motion to correct things. She wrongly stated, "It will not affect the judge's decision." Whether Judge Connelly relied on the fact I made a claim for damages, albeit unartfully, is material in this present case and his arguments relating to mere equitable relief. Judge Connelly espoused the reason he kicked my case out, was based the incorrect assumption I only pled for injunctive relief. (DI 16, 17, 30, 31, 59, 60)

20. It is wrong for staff to persuade people not to exercise their right to petition, because they do not want to be inconvenienced or to get into trouble, by indicating it would not make a difference.

21. It is wrong for the Court's staff to behave with the authority of a judge, determining outcomes, denying opportunities to be heard by discouraging parties from exercising their right to file motions.

22. Court staff must never pressure parties to waive their Fundamental rights and opportunity to be heard, for their mere convenience.

23. It is material to my case that Chief Judge Connelly misleadingly omitted the fact Defendants brought the petition against me, because they had concerns after reading my pleadings in both the Chancery and Delaware Supreme

Court. Judge Connelly misrepresented the case by referring to the mere Chancery Court. (Id. and DI 2, 3, 4, 43)

24. The Delaware Supreme Court incited the disciplinary proceeding, and denied me the opportunity to be heard, the opportunity to perform discovery and subpoena two witnesses they terminated to prevent favorable testimony in my defense. (3DI 77-3-77-9, 3DI 50-55)

25. The Delaware Supreme Court removed 4 of my pleadings which are material to my defense and this case from their docket of *Kelly v Trump*, Case No 119-2021, to fix the outcome of this proceeding and the disciplinary proceedings against me. (3DI 41-46, 77-10-11; DI 62)

26. None of this is normal or okay, no matter how repugnant the government finds my belief in Jesus Christ. Defendants assert my beliefs in Jesus are illogical as the reason they brought this petition. (August 23, 2022 threatening letter, Petition at 7).

27. The State Court is required to examine legal arguments, not whether they agree with my religious-political beliefs, speech and exercise of such in my RFRA petition in *Kelly v Trump*, wherein I sought to alleviate a substantial burden upon my religious exercise by former President Trump and current President Biden.

28. The admitted purpose of the Defendants reason for any concern about alleged disability is material to the case. The reason is my religious-political beliefs and speech contained in the petitions. (DI 2-4, See the August 23, 2022 letter, Petition at 7)

29. The judge's and Defense counsel's omission of the Delaware Supreme Court pleadings, in their memorandum and motion for affirmance, as the source of the disciplinary proceeding is material to my case. Both the State court and Defendants through their counsel mislead this appellate court and the public.

30. Then the Delaware Supreme Court cry babied about the fact I pled for additional time because the Wild life police and the Federal Government were helping, me eliminate vultures which were attacking me and my property. Please see the video relating to vultures on the memory stick.

31. The vulture problem was serious enough for the Federal government to request a permit to place an effigy on my property. (Exhibit A, all Exhibits are incorporated herein by reference in their entirety)

32 Jeffrey R. Newcomer, a Wildlife Biologist with the USDA placed a dead bird in one of my trees, which reduced the vulture's attacks.

33. In the Disciplinary Order, the Delaware Supreme Court heartlessly refers to my requests for an accommodation due to supervening events making it impactable, while granting my requests for extensions for these reasons, but

denying them for more fundamental reasons, by ignoring my appeals from the Board below. (3DI 74-75)

34. I include the two motions the Supreme Court granted for good cause here, to be incorporated herein by reference in their entirety. (Exhibit C and D).

35. My motion before the Board were ignored, or denied consideration by the Delaware Supreme Court until my rights were already violated by procedural defects that caused manifest injustice by violating my right to defend the exercise of fundamental rights, including violating my First Amendment right to belief, exercise of belief, association, speech, equal protection and substantive and procedural due process. US Const Amend I, XIV.

36. The Defendants denied me of a fair opportunity to perform discovery, subpoena witnesses, to conceal the fact the Supreme Court and Defendants hid evidence to fix the proceeding against me. They did not want me to find out. (DI. 69-75)

37. 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.

38. 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. (DI 74)

39. On November 4, 2021, Delaware Supreme Court sealed or removed four of 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. (3DI 41, 42, 43, 44, 45, 46)

40. 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. (DI 74)

41. Third Circuit Judge Bright's, concurring in part and dissenting in part 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.

42. 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. (DI 74)

43. "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).

44. 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, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

45. 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. The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point.

46. 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.

47. The Board merely gave me two weeks, until the hearing, after allowing me to remove the appointed attorney by the December 30, 2021 Order. The Board ignored the motion I filed two weeks before self-representation was allowed, wherein I objected to notice, and moved for opportunity to perform discovery. (DI 74)

48. The fact I complained I required time because of outside issues interfering with my time and focus, in the rushed sham proceeding conducted against me for the exercise of fundamental rights and to cover up years of disparate treatment against me for my religious beliefs, is not evidence of disability.

49. My requests for adequate extensions for time to prepare, perform discovery before the Board were denied. Albeit the Board gave an insignificant extension in my second request, due to a reason not contained in my motion, the shingles. Id.

50. The Delaware Supreme Court cry babied that my religious-political and religious views did not make sense, which is not for them to decide.

51. The Delaware Supreme Court in conspiracy with the Board rushed the proceeding, ignored my motions, colluded with the Board and Defendants by predetermining the case, without affording me an opportunity to be heard until my rights were already lost per the two orders below, in the Board pleadings case

based on their desire to punish me for my religious-political speech, and beliefs contained in the petitions. (DI 43, 69-75)

52. The Defendants and Delaware Supreme Court behaved like monsters rushing the proceeding, ignoring my motions, denying me of my rights, in hopes to cause me to fall ill to use it against me. I did fall ill, with the shingles. Id. (Exhibit D)

53. The Court must not act like heartless machines, but humans, capable of caring for the people they serve who plead their cries for help before it.

54. The State Court failed to look at my legal arguments. The Court looked at my religious-political-personal beliefs, while heavily citing a footnote on a document, which was not on the record before the Board below. (DI 74) I was denied an opportunity to be heard on the Court's admittance of evidence not on the record.

55. I admit I have typos and run on sentences in some pleadings. Rights must be asserted, even imperfectly. Otherwise they may be waived.

56. I am poor. I had no computer or printer or money for transportation, at times. I desperately wrote at public libraries where I was kicked off the computer, and could not afford to pay the cost of additional print jobs. I had to get my petition out there, in order to be heard or my rights would be waived.

57. I do not regret imperfectly standing up for my faith in Jesus Christ from a substantial burden caused by the government. I would regret doing nothing.

58. I do not regret standing up for my belief in Jesus against the state of Delaware either, no matter if they find my faith in Jesus as opposed to money as savior “dangerous.”

59. I am not controlled by money as God and guide, to be controlled by the state, or government backed private or foreign partners by purchase, as opposed to justice. I am free in Christ. I am not for sale. I am a child of God, not business greed, which I believe is the mark of those who choose the way to hell. I keep myself separate, holy, not forcing my beliefs upon others. I merely share them, unashamed, as truth. It should not be dangerous to speak on personal religious-political beliefs.

60. The government is forbidden from persecuting me, a private citizen, not a government employee or agent, but for the exercise of my religious belief through my speech under US Amend I, XIV. I should not face government persecution. If the state looks as citizens as people to purchase who owe them and must contribute to their government, none are free. We are slaves of the state who exploits the people to serve greed, as opposed to serving the people to uphold justice.

61. With regards to court staff, I filed a motion in the District Court, I believed was critical. I filed it while paying an additional next day mailing fee. I believe it was an additional 26 dollars if I remember correctly. (Exhibit D).

62. The filing was received per the post office, but the staff at the court house indicated it was not received. The post office confirmed receipt on November 10, 2021, and so did the filing attached to the document court stamped November 18, 2021 with the Delaware District Court, next day delivery from November 9, 2021.

63. I had no phone at the time. I used my neighbor's phone, former US marine, William Jones.

64. I experienced great emotional distress at the prospect my filing would not be heard. I was required to walk down the street and request the use of a phone multiple times, in tears as my life and liberty are on the line, but for my faith in Jesus Christ.

65. I incurred expenses to mail another motion out that cost more to me than the common person.

66. Defendants prevent me from seeking to return to my former law firm, causing me the impediment of poverty.

67. I received unfair treatment by the Delaware Supreme Court's Clerk, Lisa Dolph, by her refusal to upload my physical files, after agreeing to accept

physical files in advance. (Exhibit F). She indicated they were filed, just not electronically recorded.

68. I believe the Delaware Supreme Court desired to conceal its clear violations of my opportunity to be heard by ignoring motions, the rendering of email, non-appealable orders relating to one not all of the outstanding ignored, unaddressed motions by the Board, lack of meaningful access to the courts and many other alarming, disparate conduct, based on political-religious animus, poverty animus, and Defendants desire to conceal state misconduct by not docketing the pleadings I promptly filed.

69. I was required to upload the documents electronically myself in order to place them on the electronic record of the Delaware Supreme Court to appeal to the US Supreme Court in the fixed, sham disciplinary proceeding against me.

70. I needed the documents to be on the electronic record, in order to be heard on all the many procedural, Equal Protection and First Amendment defects in the disciplinary proceeding in state court, in order to have an opportunity to be heard on appeal before the US Supreme Court.

71. I left messages with my case manager and the court on August 24, 2022.

72. Per the attached email, I incorporate herein as Exhibit G, I confirmed my case manager and the Court would look out for the mailings to place on my disciplinary matter, not this matter.

73. My case manager and other representatives confirmed they would upload the documents promptly, without prejudicial delay to the correct matter, not this civil rights case.

74. I spoke with my case manager yesterday. She claimed she did not scan in the document, and claimed ignorance as to why she received it.

75. She claimed she thought it might be an emergency filing.

76. My case manager either misrepresented the facts to me, to prejudice my case, or to cover her mistakes, or did not care to know, to scroll down to the bottom to see the letter.

77. If it is the later, she did not care to scroll down to confirm it is a letter, that is a problem for the public and other pro se filings this court must take seriously, just as seriously as wealthier claimants who may afford representation.

78. When I spoke with Sam on the phone, I was cognizant the Court chose to fire two Chancery Court staff. The Supreme Court signed off through Mrs. Robinson, a staff attorney on their termination, or at least the termination of Arline Simmons.

79. Hiding mistakes and bad choices does not improve the administration of justice. I desire mercy not sacrifice, to improve, not condemnation or sacrifice.

80. So, I told Sam it was never her fault. It was the judges. I did not want her to get into trouble or fired like the two Delaware Chancery Court staff.

81. I believed it to be the Court's error, not hers. If Judge Connelly below read my pleading claims for damages, he has no excuse for relying on the filing error by the Court's staff. (DI 2, 34-35, 43).

82. I believe when judges make bad choices by misrepresenting the facts, committing clear error, it is the court's mistake to correct, not the staffs' to blame.

83. I still do not want any staff to get into trouble. However, I see now, maybe it is the fault of the Court's staff when they prevent injustice by misfiling documents.

84. Attorneys file electronically. Whereas, impoverished and other pro se claimants may file by paper.

85. Whether the documents are accurately filed matters.

86. For instance, the document filed at DI 77 was improperly filed. The letter was not separated from exhibits, or proof of mailing.

87. The means the letter was filed was disfavorable towards me almost to intentionally prejudice this case. The sham order was legible in bold. Whereas,

my exhibits in defense of my exercise of Fundamental rights were faint and hard to read, wasting over 100 pages of paper, by making it illegible.

88. The poor and pro se require equal protections of the law, without disparate disfavorable treatment.

89. Convenience, productivity, and avoidance of costs must never be used to eliminate the Court's duty to administer justice in a fair manner, in each case.

90. Fairness is not sameness. Freedom means each individual believes and exercise's religious belief by the dictates of their conscience, not an organization, or a government backed private partner, community, government or church. The organizations are not God. God is God. I must protect those who believe differently than I do too.

91. This case relates to the fact I complained to the Delaware Supreme Court regarding court staff and agents impeding my access to the courts, writing on my pleadings acting as a witness without cross examination, misleading me to almost miss my filing deadline in hopes the case would be dropped, attacking me during *Kelly v Trump* to fix the outcome by compelling me to drop the case, filing threatening letters, having Judge Clark of the Court of Common Pleas attack me all during a live controversy in *Kelly v Trump*. (DI 43).

92. The Delaware State Supreme court's arms, agents and staff must not collude with the presiding court to eliminate cases, where they find independent-

religious- political beliefs repugnant or illogical, such as they appear to find my beliefs.

93. The Court is not God, and has no place to indicate my faith in Jesus as God, guide and savior, not money as God, guide and savior creates a danger to the public.

94. I protect the public from being sold and enslaved to the government's bartered for government backed private and foreign partners, by standing up for myself and my belief in God right here, and right now.

95. Beliefs, even wrong beliefs, or repugnant beliefs must be protected.

96. I request the Court improve the administration of justice, by shedding light on it, not punishing Court staff to conceal mistakes or bad choices.

97. I care about the two court staff who were terminated, who likely signed confidentiality agreements to gain retirement benefits, Arline Simmons and Katrina Kruger.

98. While they may have made bad choices, I desire justice with mercy to improve the world by correcting it, not destroying the lives of people who make mistakes and bad choices.

99. I day-dreamed about asserting third party standing to seek damages on their behalf in the amount of a million dollars each, and yet I do not like to use money as punishment. Besides, I have not brainstormed a way to assert standing.

100. If the courts behave uncontrolled by justice in exchange for focus on lusts for money and productivity, they do not care for, or serve the people.

101. Caring to even read the in forma pauperis document which was sent to me in error left an impression upon me.

102. Individual judges and staff are important and are not replaceable by automation, which does not have a heart to care about people.

103. My hope is that this case will improve the courts by guiding them to focus on justice not productivity.

104. I have religious beliefs against indebtedness, healthcare and mental healthcare and many other matters the world praises.

105. The district court acts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, and the state Courts pursuant to the 14<sup>th</sup> Amendment, towards me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty, by denying my motion to waive costs, eliminating my electronic service function, and causing an obstacle to my access to the courts to exercise my fundamental rights. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.”); See, *Harris v.*

*McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.”); See, *Harris v.*

*McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) “[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.”)

106. “Because this case implicates the [Constitutionally protected First Amendment rights of speech, belief, exercise of belief, association and the] right of access to the courts,” 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).

107. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

108. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. My right to speech, belief, exercise of belief, association, Equal Protection, substantive and procedural due process are a protected source of the Delaware District civil rights proceeding too. US Amend I, V, XIV.

109. Fundamental rights are implicated. Defendants violated my equal protection, as a class of one, procedural and substantive due process opportunity to

be heard, to prepare and present evidence, to subpoena witnesses, to cross examine my accuser, and Defendants persecute me and seek to defame my character and take away my property interest in my license to practice law but for my exercise of Constitutionally protected conduct, in violation of my freedom to petition concerning my religious-political speech, religious-political exercise, religious-political belief, religious-political association, and association as a party, attorney, Democrat and Christian when I believe there has been a grievance committed against me.

110. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

"When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between 'possibly good and obviously bad cases,' but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal." Douglas, 372 U.S., at 357-358

111. The Court's misfilings or misconduct relating to filings, based on either religious-political or poverty animus, or exercise of fundamental rights or attempts to conceal misconduct or mistakes must not be permitted to deny claimants of access to the courts.

112. In my case, a court staff who was terminated doctored up a subpoena, essentially testifying without cross examination. This caused confusion and additional filings. I did not understand why I could not serve local counsel. My case Kelly v Trump should have been kicked out for failure to serve him. Yet, the Court kicked it out because it found my arguments against the establishment of government religious beliefs, which endangered my life and property to be without merit.

113. The Courts were wrong to terminate the two staff who made mistakes. It is possible lay people did not know you could not write on pleadings without parties knowing on the record, as if testifying as a witness without ability to cross examine them in violation of my 6<sup>th</sup> Amendment rights. (See the attached letter, dated November 6, 2020 to the Chancery Court, the attached doctored up subpoena on the record, and the attached same subpoena I received without hand written notes on it)

114. Instead of destroying people's lives, hiding them in darkness, eliminating them, please help them improve.

115. The staff will likely aid more *in forma pauperis* claimants as the economy becomes worse . Fewer people will be able to afford lawyers.

116. People can care to look into matters further. Computers cannot. I would prefer the court to consider helping staff serve others better by looking at others as people to serve as opposed to productivity.

Wherefore I pray this Court considers this in Addendum and grants my motion to strike 3DI 77, eliminate it and seal it off the record and transfers the physical documents to the correct case manager and matter number 22-3087.

August 25, 2022

Respectfully Submitted,

/s/Meghan Kelly  
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## Appendix X

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	Case No. 22-8037

Petitioner Plaintiff Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 31, 2022, and move for a Judge, **not the Clerk of the Court to render an order on this Motion for Reargument**, and her Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, **due to the fact I brought up mistakes or potential misconduct by the clerk's office to correct, to preserve impartiality**

I, Petitioner, Plaintiff Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 40, respectfully request reargument on Order Dated August 31, 2022, and I request a Judge, **not the Clerk of the Court to render an order on this Motion for Reargument**, and my Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, **due to the fact I brought up mistakes or potential misconduct by the clerk's office to correct, to preserve impartiality. (3DI-77-86)**

1. I made complaints about the other courts and this clerk's office's improper and unacceptable conduct in this proceeding. I expressed concerns about whether other *in forma pauperis* or pro se claimants were similarly treated. This

disparate, unfavorable treatment creates an obstacle to my access to the courts, and access of those similarly situated. (3DI-82, incorporated herein in its entirety by reference)

2. I requested a stay in this case, twice. (3D-36-39, 3D-73). I reserve my motion for a stay and do not waive my motion for a stay. (3DI 86)

3. The Clerk indicated I slowed down the matter. I by no means slowed down the matter by moving the court to require the Clerk's office to upload documents to the correct matter, Case No 22-8037, in a non-prejudicial manner in order that I may not be further prejudiced than I already am. Other courts maybe watching this case, or this court may be watched by the judge or panel in the reciprocal proceeding. (3DI 82)

4. Per the attached Order, the Clerk's office is biased, and threatens sanctions against me for the exercise of my right to petition the Court by in defense of my fundamental rights by presenting evidence of the **Clerk's office's or my case manager Pamela Batt's misconduct and mistakes.** (3DI-86 or other number in 22-8037)

5. I object to the characterization of my calls and communications contained in the Clerk's Order. The comments appear similar to Defendant Disciplinary counsel's comments to me regarding my communications to Defendants in defense of my fundamental rights.

6. I am concerned about ex parte communications by the Defendants or their agents to the court in this Civil Rights case, which is a denial of procedural due process by causing unfairness. US Amend V.

7. I object to the Court to any improper ex parte communications from Defendants or their agents.

8. I made a reasonable amount of calls seeking confirmation that my documents are filed in the matter 22-8037. I made a reasonable amount of calls seeking aid in electronic filing in the disciplinary matter 22-8037.

9. Given my additional time constraints in state court, and the other reciprocal proceedings this was reasonable, and necessary for me to do.

10. It is unfortunate, that my case manager has been out for more than a week and a half after I mailed pleadings. Over a week ago the Third Circuit Court staff promised to inform Desiree's team and stated "my filings would not sit on her desk," My filings would be filed without delay in 22-8037. It appears the staff changed their mind when I followed up near the end of last week. This caused me to take time out to file motions in this court to preserve my opportunity to be heard without additional prejudice, by an impartial adjudicator, not the Clerk. (3DI 79, 80, 81, 82, 83, 84, 85)

11. Additionally, I thought it important to notify this Court by emailing Pamela Batts, my case manager, that I have fallen ill. I sent her and opposing

counsel emails concerning my fever, dizziness, and weakness on August 29, 2022.

On August 30, 2022 I sent her and opposing counsel emails of my worsening condition and increase in fever, exceeding 100. (Exhibit B).

12. Given my time constraints, and desire to keep opposing counsel and the Court well, I thought it appropriate to inform my case manager I have a fever. I mailed my documents into the Court prior to falling ill. (Id. 3DI 82, 84)

13. Since the subject of this motion relates to the Clerk's office's misfiling and other mistakes or misconduct by the Clerk of her agents, including my case manager, it is not appropriate for the Clerk to be the judge in her own case.

14. I am entitled to an impartial judge, in accordance with the First and Fifth Amendment procedural and substantive Due Process protections to defend the exercise of my fundamental rights, without unequal disparate treatment in violation of my right to Equal Protections, based on pro se in forma pauperis animus, or religious-political-poverty animus, as a party of one or in a class of pro se filers.<sup>1</sup>

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<sup>1</sup> US Amend I, V. (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) ("Petitioner is entitled to a neutral and detached judge in the first instance."); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) ("excluding evidence [in my case emails] of efforts to influence a witness' testimony [to

15. I request this Order be overturned in its entirety.
16. I have a right to know whether my filings have been accepted by the Court in a timely manner, so as not to foreseeably prejudice my case, and my matters in 8 other forums relating to reciprocal attorney discipline.
17. I am backed up and have not started my for cause motions in three courts due the next 2-3 weeks. In addition, it is unclear what my status is in the other three jurisdictions. It is reasonable for me to follow up on motions made to protect my speech, religious belief, association and right to petition, in this court. It is unreasonable and unfair for this court to wait a week and a half to address my concerns.
18. It is unreasonable to create obstacles or additional burdens upon prose *in forma pauperis* claimants for the convenience of the court, at the cost of injustice, in the form of loss of my time from my other matters where I must assert rights timely in order to prevent waiver. I am being persecuted for my faith in Jesus Christ, and my First Amendment speech, exercise of belief, association, and my right to petition the courts. My faith in Jesus Christ is the most important

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exclude evidence] constitutes reversible error. ....“Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party...”); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).

matter in my life. I should not be punished for my religious beliefs, nor should I receive disparate treatment based on the court's disparate treatment towards me, as a class of one, or towards all pro se, in forma pauperis claimants.

19. The Court threatens me with sanctions knowing going into debt by penalties or otherwise violates my religious beliefs in violation of my First Amendment rights. I have drafted a number of petitions relating to this.

20. I am under great time constraints and have fallen ill with a temperature exceeding 100. I emailed my case manager and opposing counsel on August 29, 2022, and August 30, 2022, as my condition worsened. (3DI-84-85).

21. My case manager, Pamela Batts appeared to mislead me to cover her mistakes or misconduct twice. The Court's order prevents me from uncovering evidence in support of my motion for relief. (3DI-82).

22. Over the weekend I was so upset to learn the Exhibits appeared to be doctored to remove my case manager's email address at 3DI 81-5 Page 3 Date filed 8/25/2022. (3DI 81)

23. I do not know how the address was removed, and whether it was removed from another Third Circuit filing or District Court filing I downloaded it from.

24. I know that Pamela Batts had an interest in not having her email on the record, to prevent another court from calling her as a witness for another

reciprocal matter. I thought someone removed Pamela Batt's email address in the Third Circuit or the Delaware District Court to conceal evidence. I thought maybe she did, and I should ask her.

25. The disciplinary proceeding in the state court was brought, in part, to conceal the Chancery Court's similar doctoring of my filings. (D.I. 2, 43)

26. I do not want Pamela Batts to get into trouble. (3DI-82). I contacted her in order to avoid embarrassing her before the court by adding it to the list of other potential mistakes and misconduct by the courts outlined in my second corrected motion, and in my complaint below at DI 2, 43, and other filings on the record.

27. The state courts terminated the staff member who doctored my pleading. I desire fair treatment to me, and other similarly situated pro se in forma pauperis claimants without additional obstacles causing a substantial burden, by prejudicially documents, but for the exercise of the right to defend Fundamental rights. US Const I, V, XIV.

28. On Monday 8/22/2022, I contacted the Court to alert them paper filings were coming their way for the disciplinary matter, not the civil rights case. (3D.I. 77, 78, 80, 81, 82, 83); (See Attached, Exhibits C through G incorporated by reference in their entirety.)

29. I was transferred to Desiree's email, where I learned she was out until August 31, 2022, leaving me with about half the time prescribed by statute to draft a for cause motion. Id.

30. I contacted the Court again 8/22/22, and told a staff member to please file the mailings I previously sent, which would arrive this week in the disciplinary case.

31. The staff member said she would relay the message to Desiree's team, and I should not worry, "the documents will not be sitting on Desiree's desk."

32. After my call, I emailed opposing counsel and my case manager to provide an update that mailings were coming in for the disciplinary matter, not the civil rights case. My case manager appeared to acknowledge she knew the paper mailed filings were for the disciplinary case, and not to file them for the Civil rights case. Id.

33. One disciplinary mailing was filed in this civil rights case despite my efforts to prevent the same. (3DI 77) Worse yet, they were scanned in a prejudicial manner, with the Order highlighted, exhibits not separated, and documents in my defense faint. I contacted the court and left messages, and attempted to contact my case manager to correct the misfiled document.

34. I filed a letter, incorporated herein by reference, with the court to strike DI 77. (3DI 78). My case manager indicated "she thought it was filed by

emergency motion." Yet, if you scroll down, you will see the envelop at (DI 77 at page 243-244).

35. I am concerned that case managers do not carefully review documents, separating them correctly for all pro se filers. I received another pro se claimants in forma pauperis filings by the Third Circuit Court's mistake. Professionalism requires the court's agents to care for those they serve, as opposed to sacrificing the right to petition for productivity because of carelessness or worse, bad faith obstruction of pro se in forma pauperis petitioner's access to the courts causing a substantial burden for the class of the poor or pro se claimants, or merely to me as a party of one.

36. The Order requests I do not file emergency filings unless there is an emergency.

37. The only emergency filing I attempted to make, which did not appear to be accepted by the court, related to forwarding the exact email filings I filed with the Delaware Supreme Court, by forwarding the same, to show they were removed from the docket, along with the docket I filed with the US Supreme Court in Kelly v Trump 21-2255, and an updated docket where 4 items were missing. I filed the same motion on the docket 3DI-41-46, incorporated herein by reference in its entirety. So, there was no need to consider the emergency motion.

38. I believed that filing was a true emergency. I had hoped this court may have been able to prevent by preventing additional loss of fundamental rights by an immediate TRO. I was able to regain access to PACER, which may have been down for maintenance.

39. Emails are material to my pleading, and the Clerk's office cannot conceal their own mistake or misconduct by directing me not to provide emails that uncover communications showing my case manager's communications and knowledge of the events.

40. The Order must be overruled.

41. The disciplinary proceeding was brought inter alias to cover up the State Court's office's doctoring up my filing, firing staff who I alleged disparately treated me, and removing my pleadings to conceal evidence in my favor to fix both this civil rights case and the disciplinary proceeding against me. (3DI

42. When Pamela Batts spoke to me on the phone, she indicated she thought I had made an emergency filing. I did not.

43. If she scrolled through the document, she would see at page 243-244 the proof of mailing. She know I had the mailings coming in for the disciplinary proceeding.

44. My case manager exhibited lack of concern and professionalism by failing to scroll down at the bottom to see at page 243-244, the proof of mailing,

and a violation of moral ethics for making excuses instead of shedding light on the mistake to rectify the situation. (Exhibit I)

45. I desire to keep a different docket item of the same filing, of a report of discipline on the docket. I sought to strike the last paragraph by letter. 3D-74-75, incorporated herein in its entirety. (3D 74-75)

46. This Clerk indicated they would use my filing for any purpose they saw fit. (3D 76).

47. It appeared after I called the Third Circuit and spoke with Desiree concerning the motion to strike the last paragraph of the letter regarding reporting to the Third Circuit, a reciprocal disciplinary proceeding resulted.

48. The reason why it is important to me to remove 3DI 77 from the docket as filed in careless error in disregard to my advance notice to the Court, or in bad faith by the court, is not only to prevent future abuse, mistreatment and mistakes by the court towards pro se or in forma pauperis filers, or me, but also because the manner in which it is filed is prejudicial. I discussed this concern in my Corrected Second Motion to strike it from the docket. 3D-82

49. I filed a Second Corrected Motion because the issue of equal access to the courts for the poor and pro se filers and me in defense of my First Amendment exercise of rights is important. Disparate treatment to the detriment of those

without attorneys, based on court staff carelessness, unconcern and misfilings potentially obstructs other claimants access to the courts beyond me is too.

50. It is unacceptable to deny me, or a class of *Informa pauperis* pro se claimants equal treatment by the courts by creating additional obstacles by sanctioning them when they move the court to correct filings the claimants believe were filed in bad faith or in error.

51. Justice and equality for all must be upheld for all, not merely by those with social or physical capital.

52. Injustice for the poor appears to be the manner the courts behave, if the manner courts have conducted themselves towards me in the State and federal courts, is the same manner they treat all *in forma pauperis* pro se clients. This is not acceptable. This needs to be corrected, without punishment, with improvement.

53. When I first starting receiving Court filings through email, by the Third Circuit for matter 21-3198, I received another person's confidential *informa pauperis* filing relating to financial information and alleged crime. (3DI 6) I notified the Court.

54. When people plead for help to the Court, they often share their most heartfelt sensitive requests. To heartlessly, carelessly not review it, when the court usually seals this, and send it to another person, shows this court cares more about

money, doing a job, convenience, not the people they serve who petition this court for help.

55. The Courts' duty is to serve justice, not greed by focusing its eyes on productivity, avoidance of costs and convenience exchanged for the cost of selling souls, individuals and individual liberty for government, and government backed private or foreign partners' interests.

56. The disparate treatment I received by state and federal courts is not acceptable, no matter how repugnant the government finds my belief in Jesus Christ. Defendants assert my beliefs in Jesus are illogical. They claim it to be a reason they brought the state disciplinary petition against me. (DI 2, 3DI-82)

57. I have religious beliefs against healthcare, mental healthcare, organized charity, debt, and worshipping business and profession as guide and God, in place of God.

58. I believe people sin for making money their guide and God. I believe those who seek to control people by indebtedness or material reward, as opposed to caring for people while safeguarding their liberties within the limit of protecting the liberty of others, sin. I believe Jesus calls them children of the devil, because they tempt people's desires to burden their will, to their dictates. This is similar to the snake in the garden tempting Eve.

59. Jesus teaches you cannot serve both God and Money. I believe those who serve money as guide, disobey Jesus and lose eternal life on the last day, should they not repent. I believe people who seek to control others by fines, monetary penalties and monetary rewards, do not serve justice by correction with mercy.

60. I am not controlled by money as God and guide, to be controlled by the state, or government backed private or foreign partners by purchase, as opposed to justice. I am free in Christ. I am not for sale. I am a child of God, not business greed, which I believe is the mark of those who choose the way to hell. I keep myself separate, holy, not forcing my beliefs upon others. I merely share them, unashamed, as truth. I should not be punished by the state or any court for defending my personal religious-political beliefs.

61. I sought safety by petitioning the courts from government incited religious-political persecution endangering my property and my person. People threw things at my vehicle. Others cast insults on me based on my perceived religious-political beliefs. Someone talked about shooting me. Another person appeared to threaten me with harm based on my perceived religious-political beliefs. A young man came to my defense. Someone shot into the home of my friend based on their political beliefs. I was scared of being killed, economically or physical or socially persecuted based on my belief in Jesus and political beliefs.

I asked the Court for help. I am in trouble for asking for help in Delaware. I am in trouble for asking you for help, gaining a fair proceeding. Please do not deny me access to the courts based on the convenience of the courts. The courts should not deny people access because they do not want to upload documents. DI 2.

62. The Courts I have asked for help, persecute me and now threaten sanctions should I include evidence on my material need for such assistance.

63. The government is forbidden from persecuting me, a private citizen, not a government employee or agent, but for the exercise of my religious belief through my speech under US Amend I, XIV. I should not face government persecution. If the state looks as citizens as people to purchase who owe them and must contribute to their government, none are free. We are slaves of the state who exploits the people to serve greed, as opposed to serving the people to uphold justice.

64. Hiding mistakes and bad choices, by preventing their admission as evidence, does not improve the administration of justice. I desire mercy not sacrifice, to improve, not condemnation or sacrifice.

65. This Court acts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, and the state Courts pursuant to the 14<sup>th</sup> Amendment, towards me, a member of class of one due to religious beliefs against

incurring debt combined and due to utter poverty, by causing an obstacle to my access to the courts to exercise my fundamental rights. The Clerk's Order must be overturned. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes."); See, *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.")

66. "Because this case implicates the [Constitutionally protected First Amendment rights of speech, belief, exercise of belief, association and the] right of access to the courts," 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).

67. The Supreme Court noted, "There can be no equal justice where the kind of trial a man gets depends on the amount of money he has." *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

68. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness

are protected. My right to speech, belief, exercise of belief, association, Equal Protection, substantive and procedural due process are a protected source of the Delaware District civil rights proceeding too. US Amend I, V, XIV.

69. Fundamental rights are implicated. Defendants violated my equal protection, as a class of one, procedural and substantive due process opportunity to be heard, to prepare and present evidence, to subpoena witnesses, to cross examine my accuser, and Defendants persecute me and seek to defame my character and take away my property interest in my license to practice law but for my exercise of Constitutionally protected conduct, in violation of my freedom to petition concerning my religious-political speech, religious-political exercise, religious-political belief, religious-political association, and association as a party, attorney, Democrat and Christian when I believe there has been a grievance committed against me.

70. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

"When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between 'possibly good and obviously bad cases,' but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal." Douglas, 372 U.S., at 357-358

71. The Court's misfilings or misconduct relating to filings, based on either religious-political or poverty animus, or exercise of fundamental rights or attempts to conceal misconduct or mistakes must not be permitted to deny claimants of access to the courts, or elimination of evidence material to their motions.

72. In my state case, a court staff who was terminated doctored up a subpoena, essentially testifying without cross examination. This caused confusion and additional filings. I did not understand why I could not serve local counsel. My case Kelly v Trump should have been kicked out for failure to serve him. Yet, the Court kicked it out because it found my arguments against the establishment of government religious beliefs, which endangered my life and property to be without merit. (3DI 82)

73. The state Courts were wrong to terminate the two staff who made mistakes. It is possible lay people did not know you could not write on pleadings without parties knowing on the record, as if testifying as a witness without ability to cross examine them in violation of my 6<sup>th</sup> Amendment rights. (See the attached letter, dated November 6, 2020 to the Chancery Court, the attached doctored up subpoena on the record, and the attached same subpoena I received without hand written notes on it)

74. Instead of destroying people's lives, hiding them in darkness, eliminating them, please help them improve.

75. The staff will likely aid more *in forma pauperis* claimants as the economy becomes worse. Fewer people will be able to afford lawyers.

76. People can care to look into matters further. Computers cannot. I would prefer the court to consider helping staff serve others better by looking at others as people to serve as opposed to productivity.

77. I am quite fatigued., a little dizzy with fever. I took covid tests, which were all negative.

78. I am in tears by the Courts cold hearted treatment. I called the District Court. I indicated I have a fever, and I did not want the staff to get sick.

79. They still require I bike 8-10 miles to the post office to file pleadings.

80. I am considering filing a shorter letter with the Court, wherein I request additional time, to prevent the trip, and potential exposure of sickness to others.

81. The staff at the District Court, indicated they have gloves, and I need not worry about getting them sick.

82. Yet, I do worry because I care about them and others. That is my nature to value people as more precious than productivity or money.

83. I will not email my case manager too often.

84. Yet, she very rarely answers her phone, and others did not last week.

85. I do not have voice mail. I prefer not to leave a message because I am not easily reached by phone.

86. In my state case, Judge Clark fom the Court of Common Pleas attacked me at BJs in an attempt to get me to drop my case.

87. The Chancery Court staff misled me to almost miss my filing deadline.

88. Defendants or their agents sent threatening letters to cause me to forgo my RFRA case against former President Donald Trump.

89. One of the letters revealed evidence that the Delaware Supreme Court instigated the wrongful attacks against me during my live case, *Kelly v Trump*.

90. I am a Christian. I believe justice in the courts is a greater command by God, preventing harm in this life and eternal death forever. *Amos 5:15, Matthew 23:23*.

91. I pray this Court allows me the opportunity, not guarantee to plea for justice in a fairer manner than the state courts.

Wherefore I pray this Court grants this motion.

August 30, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939

## Appendix Y

THIRD CIRCUIT COUTRT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
v.	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	Case No. 22-8037

Petitioner Plaintiff Meghan Kelly's Motion to supplement the record with additional information, pursuant to Rule 10 (e) (2) (3) to include Meghan Kelly's legal theory for appeal of Case No 22-8037 to the US Supreme Court, and thwarted plans, in reviewing Petitioner Plaintiff Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 30, 2022 (DI 87)

I, Petitioner, Plaintiff Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 10 (e) (2) (3), move this Court to supplement the record with additional information, including my legal theory for appeal of Case No 22-8037 to the US Supreme Court, and additional facts thwarting my plans, in reviewing Petitioner Plaintiff Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 30, 2022. (Third Circuit Docket Item No. 87)

1. On or about August 17, 2022, the Third Circuit filed an Order automatically transferring me to disabled inactive, without an opportunity to be heard on procedural defects. Id.
2. This Court in Matter No. 22-8037 held "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."

3. Under R.A.D.E. 6, suspended and disbarred attorneys, in reciprocal and *ab initio* or other disciplinary proceedings are afforded more Constitutional protections than those adjudicated disabled/inactive.

4. I desired to argue that I, individually, as a class of one, or as an attorney in the class of attorneys labeled disabled/inactive, receive fewer Constitutional protections in violation of the 5<sup>th</sup> Amendment's Equal Protections component applicable to the Federal Courts, in the defense of my exercise of Fundamental First Amendment rights. US Amend I, V.

5. All other attorneys are afforded 30 days from the date of the Order to plead why the reciprocal discipline should not be adopted by its court, including procedural defects.

6. In my case, I have many arguments relating to substantive and procedural due process violations, lack of subject matter, and other arguments.

7. I desired to argue the following, among other arguments.

8. "The imposition of discipline is unwarranted in this case. The record shows the procedure was so lacking in notice and opportunity to be heard as to constitute a deprivation of due process. There was such an infirmity of proof establishing the alleged misconduct as to give rise to the clear conviction that this Court could not, consistent with its duty, accept as final the conclusion on that subject. The imposition discipline by this Court would result in grave injustice."

9. "The hearings and actions taken against my professional license in retaliation for my exercise of Constitutional rights, violate my 1st and 14th Amendment free exercise of religious beliefs, religious-political-speech, petition and association , the Procedural and Substantive Due Process Clause and Equal Protection Clauses Protections under the 1st of the 14th Amendments. 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)"

10. "The State denied me of substantive and procedural due process rights in the Delaware disciplinary proceeding, denying me meaningful access to the courts, preventing discovery, eliminating witnesses, sealing my petitions to the advantage of the state, and denying me the right to perform discovery to conceal Court misconduct in hiding material evidence in my favor."

11. "The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, and poverty animus, in retaliation against me for filing *Kelly v Trump* and for petitioning the court regarding bar dues to safeguard my liberties."

12. "The state courts are also without subject matter jurisdiction due to their conduct and interference with *Kelly v Trump*, to fix the outcome of that case and the Delaware Supreme Court's participation in fixing the sham trial against me

in the disciplinary action by violating my procedural and substantive due process rights rendering both the action voidable.”

13. “I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion. The secret proceeding against me reveals great injustice and shows the government seeks to be above the law, untamed by the just rule of law in my case.”

14. I am not able to make any of those arguments in this Motion or my Motion for Reargument. Please do not rule on any of my silenced arguments.

15. I desire to show you my mouth is gagged by this Court, preventing me from discussing procedural defects. I believe my claims warrant review, but the Court affords none in my case.

16. This Court cut off my electronic filing access for the reciprocal automatic matter 22-8037.

17. Additionally, the Court, in a separate order, indicated it would not consider any document I mailed in, unrelating to the Petitions it cited under Rule 16.

18. I admit R.A.D.E 16 (3) permits me to contest the Order, but requires it be contested concerning the material rulings without affording me Constitutional protections.

19. I, unlike suspended and disbarred lawyers, am not allowed to argue Constitutional and procedural defects. Id.

20. R.A.D.E. 13(3) further states “by bringing such a proceeding, the [disabled] attorney waives the doctor-patient privilege (and other similar privileges) regarding the disability.” This requires additional potentially embarrassing requirements, to the class of people adjudicated disabled.

21. I have religious objections to healthcare and mental healthcare. So, this increases a burden upon me uniquely, by potentially requiring I violate my religious belief to regain my active license, to buy and sell as an attorney, in reciprocal punishment for the exercise of my First Amendment rights of speech, belief, exercise of belief, association and petition. US Amend I.

22. Under R.A.D.E. 16.5, the Court permits me to argue “that the disability has been removed and the attorney is fit to resume the practice of law.”

23. However, I am not disabled, and was wrongly labeled disabled as punishment for the exercise of fundamental rights and to cover up the Delaware Supreme Court and its agents’ misconduct. There never was a disability to remove.

24. I would like to argue the protections under Rule 6 must be extended to attorneys adjudicated disabled inactive. But I am not allowed to make that argument in the proper matter. It is unfair.

25. My legal theory was to file a for "causc motion" within the prescribcd 30 days afforded to all attorneys under the Disciplinary Rules, to argue procedural defects to be placed on the record. I assumed this Court would reject my motion.

26. That would allow me to argue the rule is unconstitutional as applied to me, and as applied to lawyers labeled disabled. Since, they unlike other lawyers are selectively denied procedural due process regarding Constitutional and procedural defects.

27. I am stuck. I did not think I was allowed to make arguments to the US Supreme Court I have not made on the record below. Nevertheless, I may attach documents the Court agreed to make on the record that clearly show arguments I would make if permitted.

28. The Court in 22-8037 indicated they would upload my documents contained in three boxes in the correct matter.

29. Attached, please find the Certificate of receipt of the mailing. (Exhibit A).

30. I am not sure if I am going to appeal the Orders on 22-8037 to the US Supreme Court within the prescribed 90 days from the date of the Order.

31. I have a fever. Additionally, I have been notified of an additional reciprocal proceeding coming my way.

32. I did not waste the Court's time. I had a purpose, to protect not only loss of my fundamental rights, but the loss of the rights of those adjudicated disabled merely because they believe or think differently than the force-thought of the state or otherwise.

33. My belief in Jesus is most important to me to protect.

34. Thank you for your time and understanding.

35. I do not want you to make a ruling on my legal theories. Please consider this information in making a determination, even if you think I have bad ideas. Even bad ideas must be protected.

36. I do not oppose any extensions Defendants may need to reply to my motion, given this new information I did not discover until after my motion was filed, that in the interest must be considered.

37. I did not review the Order the Court made until after I filed the motion on August 30, 2022.

38. My legal theory has been stifled.

Wherefore, I pray the Court grants my motion.

September 1, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693

## Appendix Y

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
v.	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	Case No. 22-8037

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3. Under R.A.D.E. 6, suspended and disbarred attorneys, in reciprocal and *ab initio* or other disciplinary proceedings are afforded more Constitutional protections than those adjudicated disabled/inactive.

4. I desired to argue that I, individually, as a class of one, or as an attorney in the class of attorneys labeled disabled/inactive, receive fewer Constitutional protections in violation of the 5<sup>th</sup> Amendment's Equal Protections component applicable to the Federal Courts, in the defense of my exercise of Fundamental First Amendment rights. US Amend I, V.

5. All other attorneys are afforded 30 days from the date of the Order to plead why the reciprocal discipline should not be adopted by its court, including procedural defects.

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9. "The hearings and actions taken against my professional license in retaliation for my exercise of Constitutional rights, violate my 1st and 14th Amendment free exercise of religious beliefs, religious-political-speech, petition and association , the Procedural and Substantive Due Process Clause and Equal Protection Clauses Protections under the 1st of the 14th Amendments. 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)"

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18. I admit R.A.D.E 16 (3) permits me to contest the Order, but requires it be contested concerning the material rulings without affording me Constitutional protections.

19. I, unlike suspended and disbarred lawyers, am not allowed to argue Constitutional and procedural defects. Id.

20. R.A.D.E. 13(3) further states “by bringing such a proceeding, the [disabled] attorney waives the doctor-patient privilege (and other similar privileges) regarding the disability.” This requires additional potentially embarrassing requirements, to the class of people adjudicated disabled.

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September 1, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693

## Appendix Z

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER §  
OF THE BAR OF THE SUPREME § Misc. 541  
COURT OF DELAWARE § Board Case No. 115327-B  
§ CONFIDENTIAL  
MEGHAN M. KELLY, §  
Respondent. §

Submitted: December 23, 2021

Decided: December 30, 2021

**ORDER**

Having carefully considered the Motion to Remove Counsel filed by Respondent Meghan M. Kelly's appointed counsel and Ms. Kelly's wish to represent herself in Board Case No. 115327-B, the Motion is GRANTED. Appointed counsel David C. Hutt, Esquire is permitted to withdraw from the appointment. Ms. Kelly may represent herself in Board Case No. 115327-B

IT IS SO ORDERED.

/s/ James T. Vaughn, Jr.  
Justice

I was sick with what I  
believed was the shingles  
exacerbated by allergies  
with fewer than 14 days  
to the hearing w/ defective  
notice, fewer than 5 days all.  
Ignored Motions to perform discovery  
never addressed.

Re: DE Supreme Court Case 541

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: lisa.dolph@delaware.gov  
Cc: david.weiss@usdoj.gov; meghankellyesq@yahoo.com  
Date: Tuesday, January 10, 2023 at 01:10 PM EST

Hi Lisa,

I believe I am entitled to these documents even if they are not uploaded on the file and serve system, including testimony before the Board regarding appointment of counsel, if applicable.

Thank you,  
Meg

On Tuesday, January 10, 2023 at 01:08:51 PM EST, Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)> wrote:

Hi Lisa,

Thank you for talking with me. May I please have the documents for DE Supreme Court No. 541 relating to appointment of counsel and removal of counsel and all documents on that docket relating to me, and the board case.

Thank you. Justice Vaughn signed the Order on or about December 30, 2022. There is no need for me to copy opposing counsel since they were privy to the arguments whereas I was not.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
(302) 493-6693  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

## APPENDIX AA

## EXHIBIT 43

Documents regarding improving healthcare while spending less money, to prevent taking advantage of the sick by killing or concealing illness to serve business greed. More money is the problem not the solution. Just decrees, and justice in the courts are the solution.

1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38<sup>th</sup> District
2. Document, "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal
3. Meghan Kelly's teaching certificate, credibility
4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law

5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

- a. History of Western Medicine
- b. Economics
- c. Medieval Philosophy
- d. Psychology courses

6. Evidence of the surgery that inspired me to study healthcare issues.

Due to the surgery referred to therein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight every month. This is still a challenge. I must assert my right to live because many people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. "I am not my own." Other people are loved by God too.

## Guest Column

# Representative candidate says health is wealth

By Meghan Kelly, Esq.  
Candidate, Delaware House  
of Representatives, 38th District

My name is Meghan Kelly, Esq. I am a candidate for the House of Representatives in the Nov. 6 race in the 38th District. I am running, in part, because I have a desire to draft laws to create better health care for Delawareans, and I want to persuade the federal legislators to draft specific legislation to reduce the price of care instead of eliminating care to those who need it most by rendering it unaffordable.

I am uniquely qualified to propose solutions in this area as an attorney who studied the history of medicine at University of Delaware, and health care finance and health care law at Duquesne School of Law School. I even received a small scholarship for healthcare law.

So, I thank you for your kind consideration, as I truly care about serving the people in the community I grew up in, and love and protecting their life and health.

This week, I will write about improving health care concerning the state of Delaware. Next week, I will submit a suggestion to our federal legislators regarding making health care more affordable. Instead of reducing the

amount of care, I respectfully urge our federal legislators to reduce the price of care. Only they have the power to do so, I will not.

In Delaware, I specifically want to draft legislation to improve the quality of health care, instead of merely getting massive bad care. Funding is more easily received when health care entities and professionals are researching cutting-edge techniques, which is dangerous for patients since they are still working out the kinks.

Think of the National Institute of the Health (NIH), charities who accept funding from the army and NIH, and private research or health care entities who make money on analysis. So they can use patient's records to sell alleged health care miracles in bulk, based on data. Part of the HIPPA waiver we sign at each doctor's visit allows our information to be used in this scientific research. So, patients may be lawfully used as lab rats.

I want to draft legislation to prevent the abuses we have seen by doctors like Dr. Earl Bradley, who allegedly molested hundreds of children; repeal the involuntary sterilization statute; and make it easier to prevent doctor and health care abuse of patients for a buck...

I want to prevent doctors from prescribing addictive drugs under the facade of benefiting the patient, but in truth to benefit their own pockets, to keep patients coming back for prescriptions for their addiction, not for good health.

I want to stop doctors like the local Delaware doctor who used cutting-edge treatments, hip replacements, on people, including my father. He said everything was fine for years, despite readily available information to the contrary, to cover his own back, instead of serving the patients like my father, the legendary retired teacher, lifeguard and coach Pat Kelly of Indian River High School.

No care is better than bad care. Thus, I desire to create legislation to ensure our health care providers are taking care of the patients, not taking advantage of the patients for profit. Our laws serve money — not people, not patients.

I want to create laws that penalize health care professionals for drugging the elderly at the elderly homes to make them easier to tend, like vegetables. We need to value and respect our elderly, (not keep them in an institution for our convenience). These institutions should

# Kelly

## *Continued from page A14*

be developed to serve and respect the elderly, not take advantage of them for a profit.

Now is the time to value human life and health more than money. Now is the time to hold health care professionals accountable for their bad choices to harm instead of heal patients.

I desire to repeal the involuntary Sterilization statute in Delaware under Title 16, Chapter 57 of the Delaware Code. There is too much incentive to sterilize people to use their stem cells for profit and research, instead of alleged need. Besides, the fact is sterilization is barbaric and arguably violates Delawareans' right to life, liberty and pursuit of happiness, despite the United States Supreme Court decision in *Buck v Bell*, 274 US 200 (1927). I desire to amend the medical mal-

practice act. It is very difficult to correct doctors under this act. In Delaware, a patient has two years from the date of the medical provider's misconduct, if a patient is younger than 6, until the patient's sixth birthday. The time may be extended in limited circumstances — for instance, if a doctor left a foreign object in a patient's body.

In addition to the short statute of limitations, in Delaware, you also need to get another health care professional to give an expert opinion concerning the malpractice of the medical provider. This is very tough to get because doctors do not want to give an opinion against a peer when they know they are capable of mistakes or a sloppy job, too.

The requirements of the expert opinion are also hard to meet. So, a lot of lawsuits are kicked out for failure to adhere to the requirements. For instance, if an expert says the doctor's act was a substantial factor in causing the harm, the opinion will get kicked out. In

Delaware, the expert must state the "but for" the doctor's conduct the harm would not have occurred.

Overall, if a doctor messes up on you, you most likely will be out of luck. The longer you wait to pursue legal relief, the tougher it will be for the attorney to find an expert required to have a case.

It is important to correct doctors, as the treatment they provide may harm other people for life or kill them. Since it's so difficult to sue, it's hard to prevent further harm by showing how certain treatments make people worse off. That's why we must amend the medical malpractice act in Delaware. We must prevent further patient harm and deaths.

By electing me you will be electing a candidate that will fight for your life and health. You are priceless — more valuable than all the money in the world. By electing me, you will be electing someone who serves people, not greed.

**Your Health is Your Wealth  
You are Priceless. Not a price Tag!**

**Kelly seeks Federal Consideration of Health Care Proposal**

My name is Meghan Kelly. I am an attorney running in the November 6, 2018 race for the House of Representatives seat in the 38th District, which includes Bethany Beach, Fenwick, Millville, Frankford, Ocean View, Selbyville and parts of Dagsboro.

I am running, in part, because I discovered I had a deep passion to change the laws to better serve people. I have had the opportunity to review proposed laws for more than ten years, starting at Richards, Layton and Finger, P.A. I have proposed comments on legislation to other attorneys in different bar sections, such as Corporate Law, E-Discovery, Personal and Real Property. Each section votes by majority. Unfortunately, I always get voted out since I tend to seek what serves Delawareans better, instead of what is convenient and profitable to our own practice. So, I continued to look at alternative ways to improve the laws.

I made calls to legislators, met with people, sent emails and letters in an attempt to amend the laws. Unfortunately, I was not successful. Yet, every time I observed corruption, abuse or misuse of power, my desire to improve the laws grew stronger. So, I found myself paying the filing fee to run for office. So, here I am.

I am running for a state legislative position. Nevertheless, the point of this letter is to discuss a suggestion relating to affordable health care that I submitted to our **federal legislators and President Trump's Delaware liaison, Councilman Rob Arlett**, in an attempt to gain their kind consideration at the federal level. Only the federal legislators will be able to address this issue, I will not. I am printing parts of some emails I sent to Rob Arlett in hopes the **federal officials** will reduce the price of health care instead of eliminating care to those who need it the most by rendering it unaffordable.

"...President Trump's initial idea was brilliant. Focus on reducing the cost of care instead of indirectly eliminating care, due to the astronomical cost. I understand your concern about appealing to emotion, but I believe people will die if they cannot afford care, just like many did prior to 1986.

Prior to 1986, Emergency Rooms ("ERs"), were turning away pregnant ladies and people in need of immediate care, due to their lack of insurance and inability to pay. Babies had complications, lots of pregnant moms died. It created public outrage.

So, Congress enacted Emergency Medical Treatment & Labor Act (EMTALA) in 1986, by using its power under Article 1 Section 8 of the Constitution, (the spending power), to require all hospitals with Emergency Rooms accept all patients regardless of their lack of insurance and inability to pay. Congress attached strings to such entities, by requiring the ERs accept all patients if they receive any Medicare or Medicaid, or be penalized financially.

Similarly, Congress can create price ceilings for drugs or health care for any entity receiving Medicare and Medicaid. This will extend to uninsured people as well.

The National Institute of the Health (NIH), is another vehicle the federal government may use to

implement President Trump's initial plan. This entity provides grants and subsidies for drug research. The Federal Government through basic contract law may condition the acceptance of such money upon the drug company's agreement to price ceilings. Should the drug company not honor such ceiling, they may draft a provision requiring the company to pay all such money back in addition to a penalty." (citation to email omitted). Medical providers may still choose to reduce the price of care to stay competitive. The price ceilings prevent entities from rendering people worthless or too expensive to care for.

"Instead of indirectly taking away care from people who cannot afford it, let's make it more affordable for people. So, like you said, Americans can assume more responsibility and autonomy in their own care.

Artificial entities without hearts care more about the bottom line than those they serve, unless caring will affect the bottom line. Congress has the ability to affect the bottom line to reduce the cost of healthcare instead of eliminating care indirectly by making it unaffordable.

Healthcare is an inelastic good, a necessity, meaning no matter how rich or poor you are, you would probably give all you had, including your home, to pay for care to save the life of your child, a loved one, or even your own life. The demand does not change with price. This is an exception to normal market theories of supply and demand dictating prices. Artificial entities will get as much money as they can, at the expense of lives.

The board members are far removed from those they serve. They most likely are thinking about how they can afford to pay for their kid's schooling instead of the individuals they serve. Since they are focused on the bottom line," please use your power federal legislators to affect the bottom. (citations to email omitted). Only you have the power to do so, I will not.

The federal legislators have Medicare, Medicaid, NIH and other mechanisms of federal funding to use as bargaining chips. They should use the bargaining chips to reduce the price of healthcare (and improve care), instead of threatening to reduce Medicare, Medicaid, or take those chips away. What will they have left to bargain with if they take everything away.

Thank you for your kind consideration.

Issue Date: September 25, 2016  
Effective Date:  
Expiration Date:

# State of Delaware

## Department of Education

### Initial License

Know all persons by these present, that

**Meghan Marie Kelly, Esq.**

has fulfilled the Licensure and Certification requirements of the Professional Standards Board  
and is certified in the following area(s):

**STANDARD: Teacher of Elementary Grades K-6 \*\***

**STANDARD: Teacher of Exceptional Children Grades K-12**

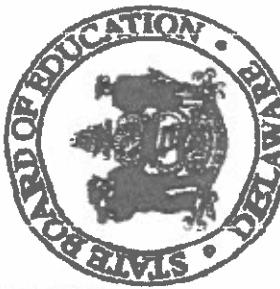
**STANDARD: Teacher of Health Education Grades 5-12**

**STANDARD: Teacher of Middle Level Mathematics Grades 6-8 \*\***

**STANDARD: Teacher of Physical Education Grades K-12**

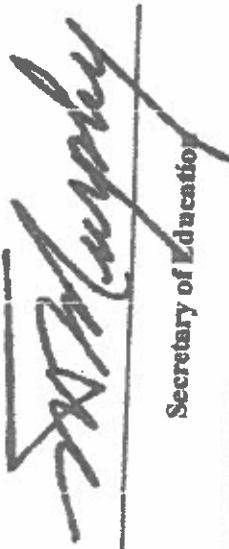
**STANDARD: Teacher of Social Studies Grades 9-12 (Valid 5-8 in a Middle School)**

This is a valid license. This license will be activated upon employment with a Delaware Public School District/Charter School.



\*\* Indicates Highly Qualified in content areas covered by this certificate

Each License Holder is Responsible for Keeping and Satisfying License Renewal Requirements or Any Provisions Required to Reinstate His or Her License/Certificate

  
Secretary of Education

LAW Transcript

Record as of: 07/01/03

# DUQUESNE UNIVERSITY

515 FORBES AVENUE PITTSBURGH, PA 15282-0299

MS. MEGHAN M. KELLY

Student ID:

SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS	DEGREE	JURIS DOCTOR	T. COMPL. G.PTS
								MAJOR	Juris Doctor - Day	
								MINOR		
10-FAL	LEGAL PROCESS AND PROCEDURE	LAW	C156	A	100	7.00	7.000			00 1.00 8.000
10-FAL	SEMESTER GPA - 3.500				2.00	3.00	7.000			00 0.50 8.000
	CONTRACTS	LAW	C114	A	100	8.00	15.000			00 1.00 22.000
	PROPERTY	LAW	C114	A	100	8.00	15.000			00 1.00 22.000
	TORTS	LAW	C110	A	100	8.00	15.000			00 1.00 22.000
	CIVIL PROCEDURE	LAW	C159	A	100	8.00	15.000			00 1.00 22.000
	CIVIL LAW & PROCEDURE	LAW	C101	A	100	8.00	15.000			00 1.00 22.000
	LEGAL RESEARCH AND WRITING	LAW	C129	A	100	8.00	15.000			00 1.00 22.000
10-SPL	SEMESTER GPA - 3.120				3.00	20.00	67.000	10-SPL	SEMESTER GPA - 3.421	10-SPL SEMESTER GPA - 3.211
	SEM C/LAW WRITING C/LAW CONV	LAW	C101	A	100	8.00	15.000			00 1.00 22.000
	10-SPL SEMESTER GPA - 3.760				3.00	20.00	67.000	10-SPL SEMESTER GPA - 3.421	10-SPL SEMESTER GPA - 3.211	00 1.00 22.000
	LABOR LAW	LAW	C174	A	100	8.00	15.000			00 1.00 22.000
10-FAL	HEALTH CARE FINANCE	LAW	C104	A	100	8.00	15.000			00 1.00 22.000
	EVIDENCE SECT B	LAW	C131	A	100	8.00	15.000			00 1.00 22.000
10-FAL	SEMESTER GPA - 3.370				3.00	20.00	67.000	10-FAL SEMESTER GPA - 3.370	10-FAL SEMESTER GPA - 3.370	00 1.00 22.000
10-FAL	LAB AND MEDICAL	LAW	C121	A	100	8.00	15.000			00 1.00 22.000
	CONSTITUTIONAL LAW SECT B	LAW	C104	A	100	8.00	15.000			00 1.00 22.000
	TAXATION	LAW	C110	A	100	8.00	15.000			00 1.00 22.000
	CORPORATIONS SECT B	LAW	C136	A	100	8.00	15.000			00 1.00 22.000
	FAMILY LAW	LAW	C104	A	100	8.00	15.000			00 1.00 22.000
10-SPL	SEMESTER GPA - 3.140				3.00	20.00	67.000	10-SPL SEMESTER GPA - 3.140	10-SPL SEMESTER GPA - 3.140	00 1.00 22.000
	CRIMINAL COURTS CLERKSHIP	LAW	C242	A	100	8.00	15.000			00 1.00 22.000
10-SPL	SEMESTER GPA - 3.690				3.00	20.00	67.000	10-SPL SEMESTER GPA - 3.690	10-SPL SEMESTER GPA - 3.690	00 1.00 22.000
	PROFESSIONAL DISPOSABILITY	LAW	C104	A	100	8.00	15.000			00 1.00 22.000
	ESTATES AND TRUSTS	LAW	C129	A	100	8.00	15.000			00 1.00 22.000
	JURIS ADVOCACY	LAW	C111	A	100	8.00	15.000			00 1.00 22.000

RAISED SEAL NOT REQUIRED

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*With care & respect*  
Patrick B. Jakes

University Registrar

ISSUED  
TO STUDENT

MEGHAN M. KELLY





BEERB MEDICAL CENTER  
424 SAVANNAH ROAD  
LEWES, DELAWARE 19958  
(302) 645-3800

DATE OF ADMISSION: 11-1-95  
DATE OF DISCHARGE: 11-4-95

DISCHARGE SUMMARY

FINAL DIAGNOSIS: Serous cyst of the left ovary with torsion.

HISTORY: She is a year old white female, Gravida 0, Para 0-0-0-0; whose last menstrual period was early October 1995. She was admitted for an exploratory laparotomy because of a large cyst in her left pelvic adnexa. She had abrupt onset of left lower quadrant abdominal pain on the morning of admission. She also had some nausea and vomiting.

PHYSICAL EXAM: She is a healthy white female in some distress. Blood pressure was 110/64. On the abdominal exams, the abdomen was flat, soft with hypoactive bowel sounds. Pelvic exam - The vagina showed normal mucosa. Cervix showed no inflammation. The uterus was midline and felt small. Adnexa on the right side was negative. The left side showed a large, irregular cyst. Rectal exam was confirmatory.

LAB DATA: Admitting CBC shows a hemoglobin of 15.2 gm/dl, hematocrit 43.3%. Serum pregnancy test was negative.

HOSPITAL COURSE: The patient had an exploratory laparotomy on 11-1-95 with excision of a large cystic left ovary plus the fallopian tube, both of which had torsion at their base. Postoperatively, the patient's hemoglobin was 12.9 gm/dl, hematocrit 35.5%. She had a normal postop course and was discharged on 11-4-95 to return to the office in two weeks.

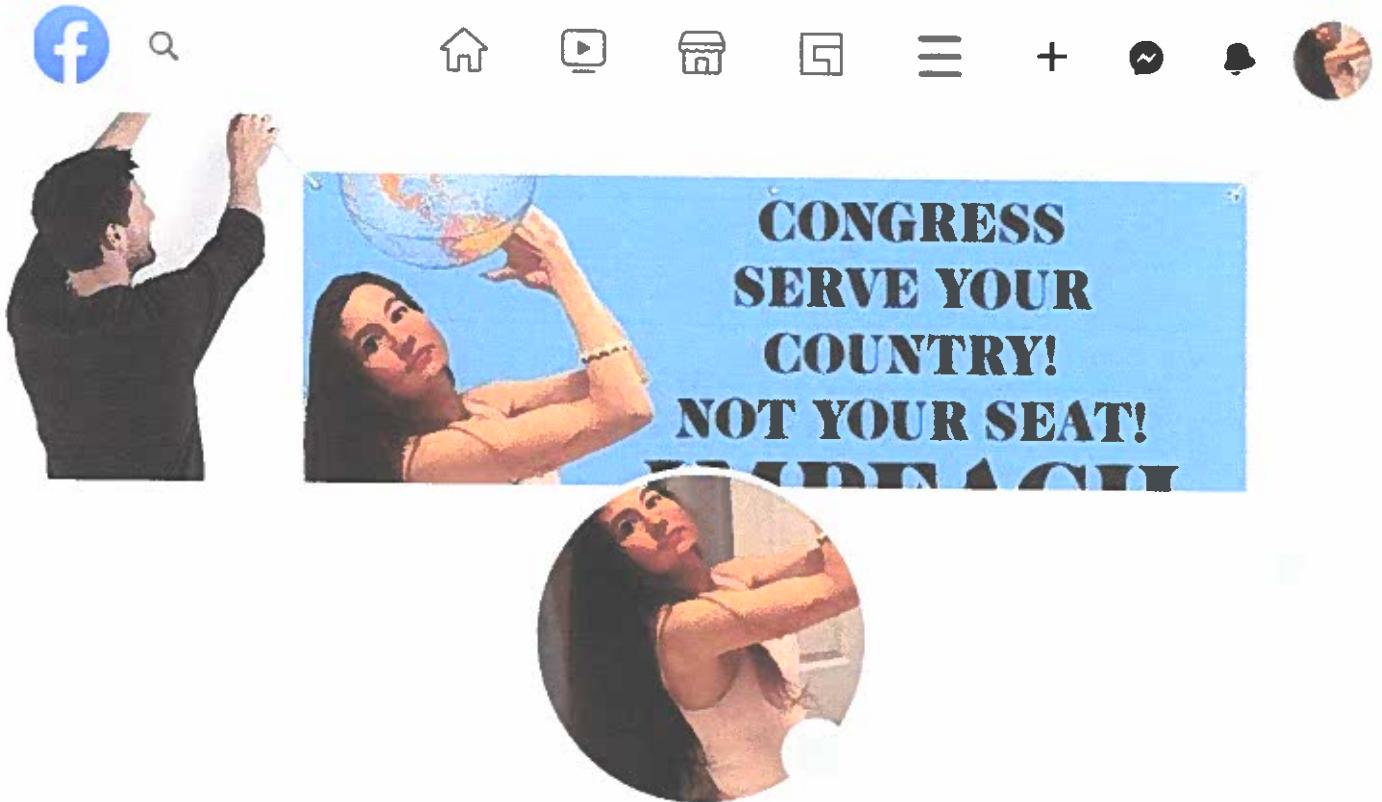
5  
NW/nas  
dictated: 11-4-95  
transcribed: 11-4-95  
cc: Dr. Washburn

newell Washburn

Newell Washburn, M.D.

DISCHARGE SUMMARY

## APPENDIX BB



# Meg Kelly

900 friends



Add to story

 Edit profile



Meg Kelly

...

## Intro

 Edit bio



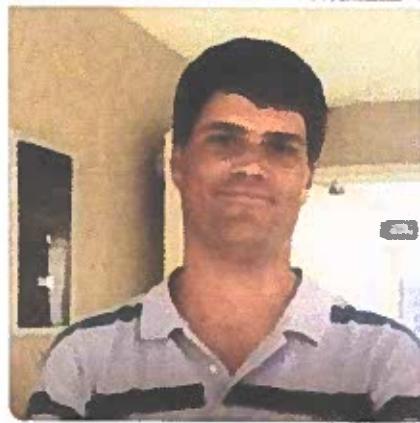
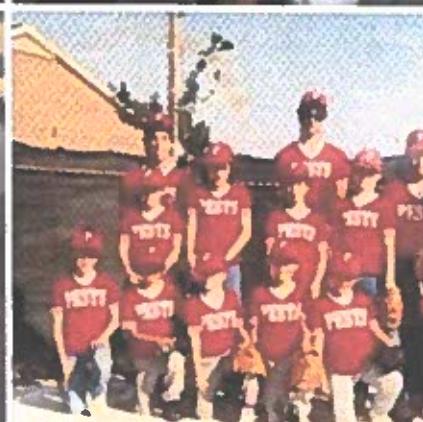
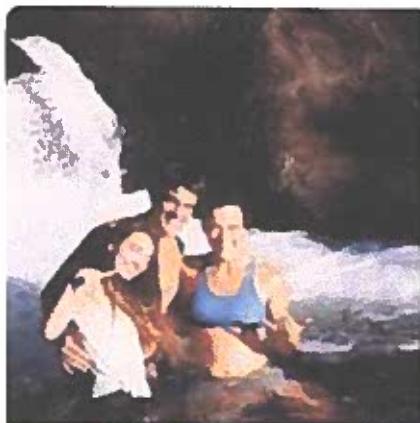
Followed by 202 people

 Edit details

 Add hobbies



## Photos

[See all photos](#)

## Friends

900 friends

[See all friends](#)



Kevin Daughaday



Ginger Turssline



Lori Cashman Funari



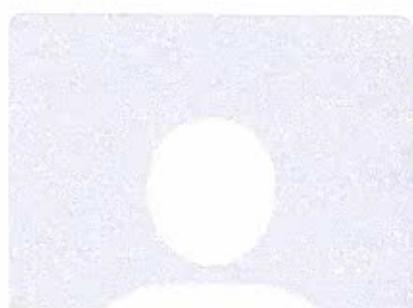
Josie Gay



Bethany Frick



Lisa Mathena

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What's on your mind?

Live video

Photo/video

Life event

Posts

Filters

Manage posts



Other posts

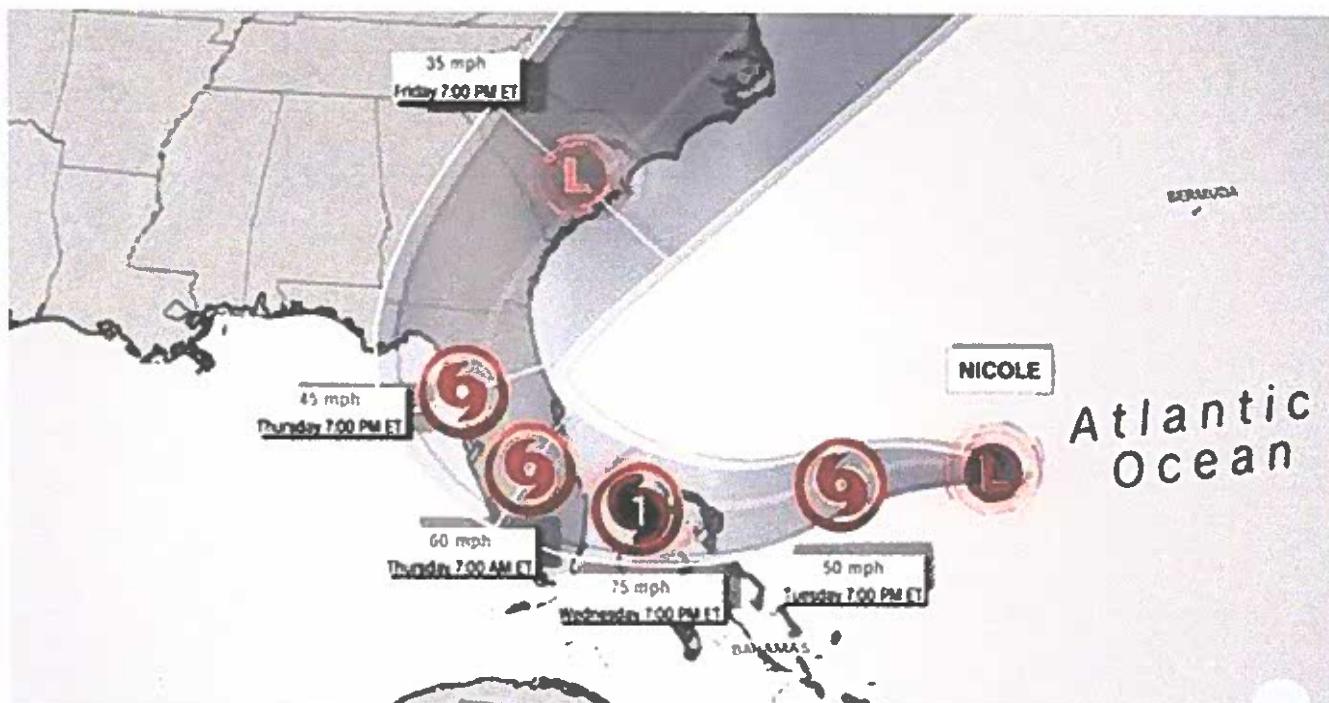


Meg Kelly

22m ·

...

My pretty mom is a little scared about Hurricane Nicole. I do not like these cute human names for storms. Call it what it is. Please no more cute people names.



CNN.COM

**Subtropical Storm Nicole is on track to strengthen into a Category 1 hurricane as it approaches Florida | CNN**

Like

Comment

Share



Write a comment...



Meg Kelly

58m ·

...

It is not patriotic but evil to make the people pay and sacrifice to serve business greed under the lie of helping Ukraine or others. Shepherds tend the flock. Wolves eat the sheep they pretend to shepherd.



## Just so you don't forget



Meg Kelly

1h

...

WE are taught to not use our brains, which allows those who purport to know best to mislead us to harm and hell. Ignorance is not innocence. Please do not blindly seek answers from other people, experts and professionals or leaders or even me. Use your own brain and analyze information. It is naughty to tell you not to do your own research. You must use your own brain or you may be misled by others to harm or damnation in the fires of hell guys. Not my brain, but your own ... [See more](#)



Lori Cashman Funari

Like

Comment

Share



...



Meg Kelly shared a memory.

2h

...

So this was the day.



3 Years Ago  
See your memories



Meg Kelly

November 8, 2019

I am having the worst day ever!!!

On the ride to Georgetown this morning, a cute old lady with white hair grimaced at me and gave me the middle finger.

Two people yesterday talked about me getting shot for my impeachment stickers. Do me a favor. STOP talking about shooting me please because someone may actually shoot me. I do not want to die. I want to live and speak life.... [See more](#)

Like

Comment



Write a comment...



Meg Kelly shared a memory.

2h

...



3 Years Ago  
See your memories



Meg Kelly

November 8, 2019

During law school, the press were the only heroes that attempted to save me. Did I get saved, no. But they are still heroes.

We must safeguard the freedom of the press. They give a voice to the voiceless, a defense to the defenseless. They are heroes shedding light on the darkness, the darkness is giving into the temptation to ignore evil by covering it up with more darkness (ignorance) instead of driving it out with light, truth....

**Meg Kelly shared a memory.**

2b



3 Years Ago  
See your memories



 Meg Kelly  
November 8, 2019 · 

Delaware screwed us in the past with the dedications of land ( gifts of land to delaware) on the condition that the land never be sold. The intent of the gifts to the government was to preserve nature and wet lands.

Those dancing dollar signs tempted delaware leaders to misbehave

They created 99 year leases. They allowed the destruction of trees and mortgaged homes on leased lands defeating the purpose preserving wetlands, trees and nature.

[Write a comment](#)**Meg Kelly shared a memory.**

2h ·

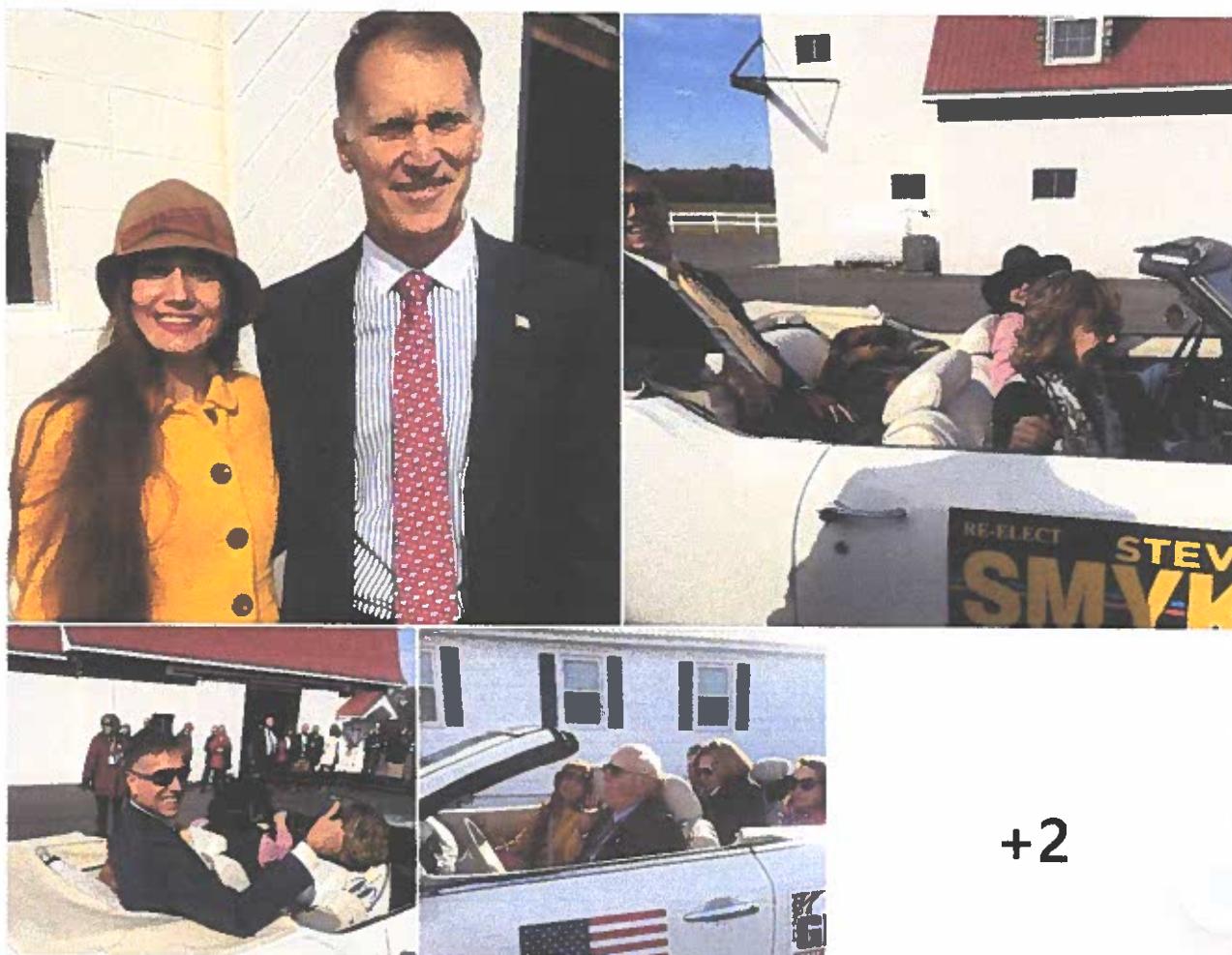
...

Vote Steve Smyk. He was my hero reflecting true leadership 4 years from today. Love you guys. He is not a mere republican. He helps all people regardless of diverse party affiliation or beliefs. Steve Smyk is special. So are you guys. Love you

**4 Years Ago**  
See your memories**Meg Kelly is with Stephen Smyk.**

November 8, 2018 ·

I am grateful for the kindness Steve Smyk bestowed on me today by allowing me the honor to ride with him. He represents burying the hatchet. He represents the hope we have with our new leaders including Colleen Daves and Kathy McGuiness. He's respectful and kind to all and honest. Years ago he reached out to me when he respectfully disagreed on my position relating to the death penalty. I appreciated it. I was really impressed. Did either of us change our mind, no. But he is ... [See more](#)



[Like](#)[Comment](#)

Write a comment...



Meg Kelly shared a memory.

2h ·

...



3 Years Ago

[See your memories](#)

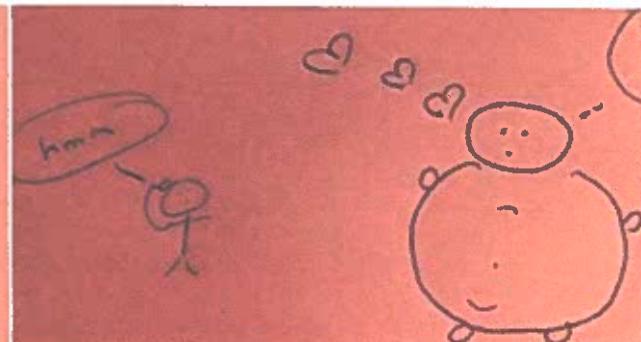
Meg Kelly

November 8, 2019 ·

I am crying because people keep pimping out beloved Jesus to fill their pockets, not hearts with love  
When I get really sad, I draft fat bellied cartoons. You are precious guys. You are not for sale. You are  
free. You are priceless not a price tag. I love you. You are loved as is. Accept it. Reflect it.



Use your brains.  
You are smart.  
You are loved.  
When someone earns



Meg Kelly

2h

...

Vote Colleen Davies. I grew up with our state treasurer, albeit I am older. We both played soccer on the boys soccer team in high school. I went to church with her family and dated her handsome brother, Charles Carroll, when I was a child. He is probably so embarrassed now. Colleen is an olive branch that extends to all, regardless of party. Guys her dad used to be the head of the Republican party in Sussex. She is heavily supported by Democrats and is a democrat that truly ... [See more](#)



## APPENDIX CC

**Re: DE Supreme Court Case 541**

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: lisa.dolph@delaware.gov  
Cc: david.weiss@usdoj.gov; meghankellyesq@yahoo.com  
Date: Wednesday, January 11, 2023 at 09:34 AM EST

Lisa,

The Court did not deny access to the documents, just mere copies to others.

I am entitled to know the record that was used against me. It is concerning especially that my motions objecting to counsel and other documents are not on the record where my life, liberty and eternal life are at stake, to show my pleas, and to show I at no time delayed but asserted my rights.

It is prejudicial that they are not located on the correct docket 22-58, for the matter against my person and license.

I cannot trust the court since it ex parte concealed records in my favor, terminated two material witnesses to prevent their discovery, preventing my motions to perform discovery to prevent me from finding out.

Please reconsider your stance. I believe I am entitled to records used against me as a party in a proceeding. I am entitled to see if my pleadings were on the record or if I was denied an opportunity to be heard in contravention to 1st and 14th Due Process with disparate treatment based on religious-political belief and poverty. US Amend I, XIV. See, 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 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).

Even the poor, and those with religious beliefs who do not conform with the majority are afforded Constitutional protections that may not be eliminated without a necessary reason more compelling than fundamental rights and protections created to protect citizens including me from government overreach.

I am entitled to the record in any case where I am a party no matter the form the court maintains them or conceals them or seeks to eliminate them as they seek to eliminate my existence by sealing records previously in Kelly v. Trump.

Thank you,  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939

On Tuesday, January 10, 2023 at 04:35:57 PM EST, Dolph, Lisa (Courts) <lisa.dolph@delaware.gov> wrote:

Meg,

As set forth in the attached order dated May 18, 2022, the Court previously denied your request for a free copy of all filings in Misc.

No. 541. In accordance with the May 18<sup>th</sup> order, I emailed you electronic copies of all File & ServeXpress filings that did not exceed 20 MB in *In re Kelly*, No. 58, 2022. Based on the attached table of contents for the exhibits to your objections in No. 58, 2022, you have the documents relating to the appointment of counsel in Misc. No. 541.

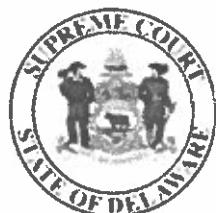
**Lisa A. Dolph**

**Clerk of Supreme Court**

**55 The Green**

**Dover, DE 19901**

**(302) 739-4187**



**From:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Sent:** Tuesday, January 10, 2023 1:11 PM  
**To:** Dolph, Lisa (Courts) <[Lisa.Dolph@delaware.gov](mailto:Lisa.Dolph@delaware.gov)>  
**Cc:** [david.weiss@usdoj.gov](mailto:david.weiss@usdoj.gov); Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Subject:** Re: DE Supreme Court Case 541

Hi Lisa,

I believe I am entitled to these documents even if they are not uploaded on the file and serve system, including testimony before the Board regarding appointment of counsel, if applicable.

Thank you,

Meg

On Tuesday, January 10, 2023 at 01:08:51 PM EST, Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)> wrote:

Hi Lisa,

Thank you for talking with me. May I please have the documents for DE Supreme Court No. 541 relating to appointment of counsel and removal of counsel and all documents on that docket relating to me, and the board case.

Thank you. Justice Vaughn signed the Order on or about December 30, 2022. There is no need for me to copy opposing counsel since they were privy to the arguments whereas I was not.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

(302) 493-6693

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

## APPENDIX DD

## Letters

Continued from page A15

in criminal prosecution. While there will always be a need for fraud investigation, I will advocate for fraud prevention and actively participate in training that supports good fiscal operations for the various entities that collect and receive state funds.

My goals are to ensure timely completion of audit mandates; to support the elimination of significant noncompliance, fraud and waste based on clearly defined criteria; to perform follow-up of prior unsolved findings and recommendations; and to provide program evaluation and process recommendations that support government transparency and good government.

On a personal note, I live in Dover with my husband, Jerry, who is retired from 20 years of active-duty service in the Air Force. He currently serves as the union president for the American Federation of Government Employees.

Local 1108, at Dover Air Force Base. We have three children and four grandchildren.

In the end, no amount of technology, contracting or delegating that can replace experience, leadership and management specific to the field of state auditing and investigating. As you research the candidates, please consider the need for state auditing qualifications and experience prior to the upcoming elections.

I humbly ask for your vote in the

Thursday, Sept. 6, primary.

Lorraine Berrios  
Candidate for Delaware Auditor of Accounts

## Reader offers idea

Editor:

I would like to share with you a quick fix to the problem of the political divide engulfing this country, if not the world.

Rewrite the Civil Rights Act of 1964

with the addition of two words: "protection from discrimination because of race, color, sex, religion, political views or national origin."

Henry R. Henzel  
Ocean View

with the addition of two words: "protection from discrimination because of race, color, sex, religion, political views or national origin."

Unfortunately, the quagmire is not limited to immigration. She has a very good point especially when she mentions our own Sen. Tom Carper, who appears to be the definition of a professional politician. Term limits would certainly be a great step toward getting things done in Washington, especially since our representatives in both parties currently seem to spend most of their efforts at getting reelected.

Fourth and last, Henry R. Henzel states that he believes that our political

divide will end. I, however, do not see

that happening any time soon! We do

have the choice between parties where,

lump you, one wants smaller govern-

ment, votes one that believes bigger

government is the answer. Our found-

ing fathers feared this type situation,

and it seems they were correct!

I do agree with Mr. Henzel's sugges-

tion that we turn off the 24/7 barrage of

so-called news that are at us by the

radio, TV and newspaper. But that is

easier said than done, and then where

would we be?

Thomas M. Murphy III  
Ocean View

July 6, 2018

## Coastal Point

Local 1108, at Dover Air Force Base.

We have three children and four grandchildren.

In the end, no amount of technology, contracting or delegating that can replace experience, leadership and management specific to the field of state auditing and investigating. As you research the candidates, please consider the need for state auditing qualifications and experience prior to the upcoming elections.

Editor:

I am writing in response to a number of letters in the June 29 Coastal Point.

Fist, Lloyd Ellings' seemingly gross misinterpretations of the Second Amendment, the NRA, and President Trump's actions are viewed as prepertious by many of us that support our right to citizens.

Second, Vickie Revere denounces President Trump's policy on the enforcement of our laws at the border.

Even though he is following the same tough policies as President Obama. The very same tough policies that were overseen by Obama's favoring media. She also mentions "the process," which I believe requires citizenship. Detention of people entering our country illegally, with or without children, is certainly necessary to protect our border and, in the long run, our country.

Third, Diane Meyer asks for term

limits while noting the immigration

quagmire currently straining our Con-

gress. A solution to the immigration

quagmire was one of President Trump's

main campaign promises, but he has

problems with the prosecutorial politi-

The Latest from the  
Off The Hook Restaurant Group...



EAT  
DRINK

## Candidate discusses

Editor:

My name is Meghan Kelly. I am an

immigrant currently struggling our Con-

gress.

Editor:

My name is Meghan Kelly. I am an

immigrant currently struggling our Con-

gress.

Editor:

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# Letters

*Continued from page A16*

attorney running for the House of Representatives in the 38th District, which includes Frankford, Selbyville, Ocean View, Bethany Beach and parts of Dagsboro.

One of the reasons why I am running is, two years ago, I found a problem that no one cares to fix. I care.

I found a lot of money not getting taxed by the State of Delaware relating to out-of-state real estate title insurance companies. I contacted various people and entities in an attempt to resolve the issue; however, to date, no one has addressed the problem. So, I am stepping up to confront the issue and to correct the problem.

It appears out-of-state title companies have been practicing Delaware law without a license for more than a decade. I talked with other real estate attorneys and discovered this has been a common practice for many years. The problem arises, real estate attorneys gain work from those same title companies. So, they fear they will lose profit should they confront this misunderstanding.

The out-of-state title companies do not pay income tax in Delaware. So, the State of Delaware is not receiving income tax for this work. In addition, this has caused errors in the chain of title for deeds. So, good title may not be transferred in real estate transac-

tions if errors are not fixed. So, I sought to correct this by discussing this with the real estate section of the Bar.

Justice Holland gave me a call and offered to draft rules, but he retired.

In addition, [state Sen. Gerald] Hocker suggested we fine the title companies for exceeding the scope of their license. I think Mr. Hocker's idea is an excellent one.

I contacted legislators concerning this, but to date this problem has not been alleviated.

Thus, I strongly urge the Delaware Assembly to draft laws to clearly address this problem by giving notice to those out-of-state title companies with a license to sell title insurance the scope of the activities they may receive payment for in the State of Delaware. Should they exceed the scope, unless authorized permitted by law, fine them a specified amount of money.

The clarification will assist title companies in performing their work in accordance with Delaware Supreme Court case law. In addition, this correction will prevent the legislators from stepping on the Delaware Supreme Court's toes by discussing the unauthorized practice of law.

Thank you for your kind consideration. As a future legislator, I hope to participate in this correction, but I am running not only to win — I am running to make a positive difference in the community I grew up in and love.

Thank you for supporting me; serving you.

**Meghan  
Dag**

## Steele weighs in

**Editor:**

This letter is to answer three letters published June 29.

First, to Mr. Ewing: Your comment about President Trump and the crying little girl on the cover of Time magazine is flat-out wrong. That little girl was crying because she was lost for a few minutes from her family and her father found her just after that photo was taken. She was immediately reunited with her mother and father. Let's face it when will Time magazine or you care state the facts correctly?

Secondly, what does the Second Amendment have anything to do with illegal immigration? Maybe you are confused and do not know what the Second Amendment is about, basically the right to bear arms. And that is what the Americans, who live along our southern border, are doing to protect themselves from armed gang members from Mexico plus the drug and human smugglers crossing the border.

You ask the question, "Whose side will you defend?" My answer: Always the Constitution! How about you?

Second, to Mr. Hansel: Thank you

## APPENDIX EE

IN THE CHANCERY COURT OF THE STATE OF DELAWARE, SUSSEX COUNTY

)  
)  
Meghan Kelly ) Civil Action No.:  
)  
Plaintiff, )  
v. )  
The Democratic Chair, Erik )  
Raser-Schramm, a.k.a. Erik Schramm )  
Individually, and in his capacity as )  
The Chairman of the Democratic )  
Party for the State of Delaware, )  
Anthony Albence, individually, and )  
in his capacity as The Election )  
Commissioner of the State of )  
Delaware Department of Elections, )  
Kathleen Jennings, individually, and )  
in her capacity as Attorney General of )  
the State of Delaware, the Delaware )  
Department of Elections, Sussex )  
County Department of Elections, Kent )  
County Department of Elections, New )  
Castle County Department of )  
Elections, and The Democratic Party )  
of the State of Delaware, a.k.a. )  
The Delaware State Committee, a.k.a. )  
The State Executive Committee, a.k.a.)  
The Democratic Party State Executive )  
Committee, a.k.a. The Executive )  
Committee of The Democratic party )  
Defendants. )

**PLAINTIFF'S CASE FOR CHRIST,  
PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS FOR THEIR  
VIOLATION OF THE EQUAL PROTECTIONS CLAUSE, IN THIS  
CLASS OF ONE, UNDER THE 1ST AMENDMENT APPLICABLE  
TO THE DEFENDANTS VIA THE 14TH AMENDMENT, FOR  
DEFENDANTS UNLAWFUL APPLICATION OF 15 DEL.C. § 3103,  
CONDITIONING PLAINTIFF'S RIGHT TO RUN TO OFFICE,**

**ON THE EMILINATATION OF OTHER  
FUNDAMENTAL RIGHTS, AS APPLIED TO PLAINTIFF**

Meghan Kelly, by and through her own representation, Attorney

Meghan Kelly, Esquire, brings this Verified Complaint, and contemporaneously therewith, *Plaintiff's Temporary Restraining Order*, and states as follows:

**THE PARTIES**

1. Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I," or "me," or "my" or "myself" also "she" and "her") is an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.
2. Defendant Erik Raser-Schramm, in his individual capacity, and in his official capacity as Chairman of the Democratic Party a.k.a. Democratic Chair ("Party Chair" and collectively, "Defendants") is a Delaware resident. The Party Chair may be served at the Democratic headquarters, a.k.a. his place of business, at, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720. He may be served at C/O, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.
3. Defendant Election Commissioner of the State, Anthony Albence, (Individually "Commissioner" and collectively, "Defendants"), in

his personal capacity and in his capacity as Election Commissioner, is a resident of the state of Delaware, whose place of business is at 905 S. Governors Ave Suite 170 Dover DE 19904. He may be served at 905 S. Governors Ave Suite 170, Dover DE 19904.

4. Defendant Kathleen Jennings, (Individually "AG," and collectively "Defendants"), in her personal capacity and in her capacity as the Attorney General for the State of Delaware, whose place of business is located at Carvel State Building 820 N. French St., Wilmington, DE 19801. She may be served at Building 820 N. French St., Wilmington, DE 19801.

5. Defendant Delaware Department of Elections (Collectively, "Defendants"), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

6. Defendant Sussex County Department of Elections (Collectively, the "Defendants"), has an address of 119 N Race St, Georgetown, DE 19947.

7. Defendant Kent County Department of Elections (Collectively, "the Defendants"), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

8. Defendant New Castle County Department of Elections (Collectively, the Defendants"), has an address of 820 N French St Ste 400, Wilmington, DE 19801.

9. Defendant Democratic Party of the State of Delaware, a.k.a. the Delaware State Committee, a.k.a. the State Executive Committee, a.k.a. the Democratic Party State Executive Committee, a.k.a. the Executive Committee of the Democratic Party, (the "Party" and the "Committee" and collectively, the "Defendants"), The Delaware Democratic Party located at 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

### **JURISDICTION**

10. This Honorable Court has jurisdiction over Plaintiff's claims pursuant to *10 Del. C. Section 341*.

11. This Honorable Court has personal jurisdiction over Defendants because Defendants are Delaware residents.

12. Defendants regularly conduct government business in this state and claims against Defendants arise from Defendants' government business transactions in the state of Delaware.

### **FACTS**

#### **I. PROCEDURAL AND LEGAL FACTS**

13. This case arises upon the Defendants' unconstitutional condition

precedent requiring Meghan Kelly to violate her religious beliefs, her belief in Jesus Christ's teachings, by conforming with the filing fee and or signature requirements pursuant to *15 Del.C. § 3103 (a)(1)(c),(d)*, in order to be placed on the ballot as a democratic candidate for the U.S. House of representative seat in the state of Delaware for the upcoming election, in violation of Meghan Kelly's first Amendment Rights, applicable to the Defendants pursuant to the Fourteenth Amendment under the Equal Protections Clause of the Constitution, in this class of one, as applied to Meghan, including her right(s) of free exercise of religion, speech, association, and right to run for office without disobeying Jesus, thereby compromising her faith and in doing so, essentially selling her soul to Satan to gain the world. (See Exhibit 1, *15 Del. C. § 3103*)

14. The Constitution preempts conflicting state and local laws and regulations.

15. The Defendants must overcome strict scrutiny to defeat Meghan Kelly's claims, in this class of one, under the Equal Protections Clause Applicable to Defendants under the Fourteenth Amendment.

16. The Equal Protections applies where a law treats a person or class of persons differently from others. An Equal Protections claim, may be brought with as few members as one. (See, *Village of Willowbrook v. Grace*, 528 US 562 (2000)).

17. Where a law limits fundamental rights, strict scrutiny will be applied, and the law, or other government action, will be upheld only if it is

necessary to promote a compelling or overriding interest.

18. All fundamental rights including the rights I seek to uphold here, including but not necessarily limited to, the right to run for office related to the right to vote, according to the dictates of my own conscience, not the dictates of the government, or agents acting with under the cloak of government authority or power, and the freedom to worship or not according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, the freedom to speak or not to speak according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, and the freedom to associate or not, according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power are at issue.

19. The Party's and the Party Chair's conduct is so entangled with the government's function, to be considered government conduct.

20. The Party and Party Chair must be considered as agents of the government, acting with under the cloak of government authority or power.

21. With the cloak of government power, the Constitution, and our laws derived from the Constitution, limit the freedoms of those in government, or acting under the cloak of government authority, such as the Party and the Party Chair, in order not to chill the freedoms of those they serve. The Constitution in this manner makes the common man more

powerful than those in positions of government authority.

22. So, I understand, once I am in office I will have fewer freedoms to speak about my belief in Jesus Christ than I do now in order not to chill the freedoms of those I hope to serve. I am just not willing to disobey Jesus to gain an election seat.

23. The Party Chair has the power to waive fees. (See, *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at \*1-2 (Del. Ch. Aug. 14, 1986), aff'd, 519 A.2d 662 (Del. 1986), (The Honorable Chancery Court noted, "This [filing fee] requirement has long been a method to effectuate the above purposes and past political practice, according to the Chairmen of the Delaware Democratic and Republican Parties, has permitted this requirement to be waived."). (See, Exhibit 2).

24. The Honorable Delaware Supreme Court, on appeal, noted that the party Chair only has statutory authority to waive such fees prior to the filing deadline. ("Attempted filing fee waiver of democratic state chairman, acting for democratic state committee after notification date, was invalid. 15 Del.C. §§ 3103(c), 3106." *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at \*5 (Del. Ch. Aug. 14, 1986), aff'd, 519 A.2d 662 (Del. 1986), Citing, *Bartley v. Davis*, 519 A.2d 662 (Del. 1986)"). (See, Exhibit 3).

25. The Party Chair and the Party has chosen not to exercise their authority to grant such waiver as mandated under the Constitution, in utter disregard to Meghan Kelly's religious waiver request, thereby essentially persecuting her based on her faith in Jesus Christ.

26. Similarly, the other Defendants, including but not limited to the Commissioner and the Delaware Department of Elections also refuse to comply with the Constitution by waiving the filing fee and signature requirements by entering her filing form as complete, thereby essentially persecution Meghan Kelly based on her free exercise of religion.

27. The Honorable Third Circuit Court, in *Belitskus v. Pizzinigrilli*, 343 F.3d 632 (3d Cir. 2003) held, “State's power to regulate elections must be exercised in a manner consistent with the Equal Protection Clause of the Fourteenth Amendment. *U.S.C.A. Const. Art. 1, § 4, cl. 1; U.S.C.A. Const. Amend. 14.*”). (See, Exhibit 4).

28. “When First and Fourteenth Amendment rights are subjected to severe restrictions under state election regulation, the regulation must be narrowly drawn to advance a state interest of compelling importance; however, when a state election law provision imposes only reasonable, nondiscriminatory restrictions upon the First and Fourteenth Amendment rights of voters, the State's important regulatory interests are generally sufficient to justify the restrictions. *U.S.C.A. Const. Amends. 1, 14*”); *Id* (Indigent candidates' “as applied” equal protection challenge to Pennsylvania's mandatory filing fee requirements was not moot under “capable of repetition, yet evading review” exception to mootness doctrine, although election in which they ran had been held; challenge was too short in duration to be fully litigated prior to its expiration, and given lack of evidence to the contrary, it was reasonable to assume that the candidates

would once again seek waiver of mandatory fees due to indigency. U.S.C.A. Const. Amend. 14; 25 P.S. § 2873(b.1)." This case is distinguished since the sole issue is based on Meghan Kelly's free exercise of her religious beliefs, which also affects her free exercise of speech, association and rights associated with her candidacy for office in this case. Yet, this Court's analysis of the "capable of repetition, yet evading review" doctrine applies to the case at hand). *Id.*

29. On or about October 28, 2019, Meghan Kelly sent the State Chair, a representative of the Democratic party, Jesse Chaderon ("Jesse"), the Party through the State Chair and Jesse, the Delaware Department of Elections an email through a representative of the Delaware Department of Elections, Kenneth A. McDowell (hereinafter referred to as "Bo," in his capacity as an agent of the Delaware Department of Elections, and not in his personal capacity), and additional people not relevant to this case, my request for a waiver from signature and or filing fee requirements, so as not to violate my religion, freedom of speech, and freedom of association, in order to be placed for on a ballot for the upcoming election for the US House of Representatives, via an email containing 4 attachments, including a letter to the Honorable Democratic Chair Erik Raser-Schramm, officially making this request. (See, Exhibit 5, the Email and the attachments thereto

including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (\*excluding the attachments to the letters in 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper and removing the old exhibit pages and removing the old exhibit pages \*), the US Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

30. On October 28, 2019, Bo kindly responded back to my Email to confirm, I was no longer seeking to run for President of the United States. (See, Exhibit 6, Bo's email, Exhibit 6, A, Emails to Defendant Delaware Department of Elections relating to Plaintiff running for President, Exhibit 6, B, an Email to Jesse and the Party and the Party Chair through Jesse relating to running for President.).

31. I emailed Bo, the ACLU, Jesse, and people unrelated to this case, to inform them to please withdraw my previous request for a waiver of signature and fee requirements to run for President of the United States. (See, Exhibit 7)

32. On or about October 29, 2019, Jesse kindly replied to my email stating he "Just wanted to acknowledge receipt of your email. I will get back

to you once I've had the chance to discuss this with the State Party Executive team" (See, Exhibit 8).

33. On or about October 29, 2019, Bo kindly took time to talk with me on the phone, as he has so often generously has done throughout the last few years. He kindly indicated the Party Chair must grant me a waiver.

34. I sent Bo the attached email to confirm my understanding that I must hold off until a determination is made by the Party Chair. (See, Exhibit 8).

35. I followed up on or about Nov 18, 2019, with an email to Jesse and the Party, and the Party Chair to check on the status of the Democratic Chair and Committee's decision. (Exhibit 9).

36. Jesse requested clarification. I provided clarification concerning my waiver in response to Jesse, the Party, and the Chair on or about November 22, 2019. (Exhibit 9).

37. On or about January 28, 2020, I sent an email to Jesse and the Party Chair, Bo, and unrelated parties requesting that they "Please provide a response!" (Exhibit 10)

38. I received an official response in the mail, dated February 3, 2020, from the Party through the Party Chair, stating:

"The Delaware Democratic Party (the "Party") is in receipt of your October 28, 2019 letter requesting a waiver of certain filing fee and

signature requirements. In keeping with current party practice and to maintain the integrity of the primary process, the Party declines to reduce, modify or waive any filing fees for any candidate. We note that you may contact the Delaware Department of Elections for additional information regarding statutory requirements and the ability to seek a waiver thereof from that office in certain circumstances." (Exhibit 11)

39. On or about February 11, 2020, I sent the Delaware Department of Elections, via Bo, the Party's determination via email, and again sought a waiver of both the filing and or signature requirements from the Delaware Department of Elections, ' in light of the fact such requirements violated my faith in Jesus Christ's teachings. (Exhibit 11, Exhibit 12).

40. On or about February 13, 2020, I followed up, and sent Emails to the Defendants, where I tried to explain, in another way, how collecting signatures violates my faith. (Exhibit 13).

41. On or about February 15, 2020, I completed the filing form, and signed it before a notary. (Exhibit 14).

42. On or about February 16, 2020, I sent the filing form via email to the Party, the Party Chair, Jesse, Bo, the Commissioner, via email. (Exhibit 14, Exhibit 15).

43. On or about February 17, 2010, I called the Commissioner to confirm receipt and to request a waiver of both signature and filing fee requirements so as not to violate my faith in Jesus Christ. The Commissioner

denied my request for a waiver. (Exhibit 16, a follow up Email confirming the conversation where the Honorable Commissioner confirmed receipt).

44. I attempted to persuade them via emails, and calls, to help them understand how the filing requirements violate my faith. (Exhibit 17, includes a variety of emails).

45. I also attempted to show the Defendants how well suited I am for the Democratic House of Representative seat by sending them various emails reflecting some of my efforts in proposing changes in the federal law and on garnering support to impeach on the 4 full separate articles of impeachment I drafted and a 5th one I started to draft. (See, Exhibit 18).

46. I am not ashamed of pleading with the Defendants to grant me a waiver. So, I do not have to disobey Jesus. (See, the Parable of the judge who lacked compassion. (See, Luke 18:1-8); (Also see, the funny parable of the man who kept bothering his neighbor in the middle of the night, until his neighbor gave him bread. Luke 11:5-13); (Also see, Luke 11:9, Matthew 21:22, Matthew 7:7 and James 4:3,)).

47. On or about February 23, 2020, I sent a number of emails to the Defendants where I demanded the Delaware Department of Elections, and the County Department of Elections and the Commissioner register my filing form as filed, as of the date received or in the alternative before the

filings deadline, without the condition precedent that I disobey Jesus Christ by conforming to the signature or filing fee requirements. (Exhibit 19).

48. I have not received a response to my demand.

49. I think the Department of Elections blocked my number. I attempted to call Bo, Kent County Department of Elections, Sussex County Department of Elections, and New Castle County Department of Elections. Unfortunately, it appears I have been blocked, as the "Your call cannot be completed at this time. Please try again later..."

50. Sadly, I failed to persuade the Defendants to register my form as filed.

51. So, I filed the Complaint in this matter, in an effort, *inter alias*, to secure the inclusion of Meghan Kelly's name as a democratic candidate for the United States House of Representatives seat for the State of Delaware for the upcoming election.

52. Pursuant to 15 Del.C. § 3101, "(1) Notification of candidacy shall be on or before 12:00 noon of the second Tuesday in July." (See, Exhibit 20).

53. That leaves very little time to respond to the pleadings.

54. That leaves very little time for me to provide notice to the public to gain their vote via non-compromising means such as newspaper articles, Facebook, and walk and talks.

55. I seek to run as a Democrat for the US House of Representative's seat in the state of Delaware.

56. I will likely face competition in the primary by Delaware's current democratic representative, in the U.S. House of Representatives, should this Honorable Court kindly grant me relief.

57. The Defendants refused to accept my filing form as registered, entered, filed and/or complete so as to assure me that I will be placed on the ballot for the upcoming election.

58. On or about October 28, 2019, I submitted the email, and attachments, including the letter to the Honorable Chair Erik Raser-Schram (hereinafter "Initial Waiver Request" or (IWR)," letter to the US Supreme Court, Court stamped Receipt, and ODC response from the Attorney Grievance Commission of Maryland relating to Justice Kavanaugh. (See, Exhibit 5, the Email and the attachments thereto including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (\*excluding the attachments to the letters in Exhibits 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper\*), the US

Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

59. In the Initial Waiver Request, I noted "(A) caveat (relating to donations), I would be willing to accept donations from the democrat(ic) party as they cannot buy me or influence me since I am already a Democrat." (Id.).

60. I have since realized that donations from the democrat party also violate Jesus Christ's teachings and lead to corruption, as I communicated to Defendants. (See Exhibit 17, included communication along with other emails).

61. I attempted to explain how both filing fee and signature requirements violate my faith in Jesus Christ as I pleaded with the Defendants to grant a waiver, so as not to violate my freedom of speech, religion and right to run for office, by conditioning such rights on eliminating another Constitutionally protected right, as applied to me.

62. I should not have to be forced to sell my soul to Satan as a condition precedent, to run as a candidate in an election.

63. I should not be forced to disobey Jesus in order for an opportunity to gain an election seat.

64. The Defendants violate my freedom to worship or not according to the dictates of my conscience, not the dictates of the government's convenience, or the dictates of the convenience, profit and the power of a few who prefer to buy or barter candidates to serve their own personal agenda at the expense of the voters, the people they are charged to care for either by law, or by proclamation of the Party.

65. The Defendants violate my *freedom*, by such unconstitutional condition precedent as applied to me.

66. I define *freedom* as *free will* to choose: to think or ignore, to care or harden your heart to, to love or not. I choose to think, care, love God, accessible through Jesus, God, the father, and the Holy Spirit, not by mere words alone, but by faithfully doing his will, even if I am the only one.

#### **I. PLAINTIFF'S RELIGIOUS BELIEF**

67. Meghan Kelly repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits the paragraphs refer to therein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, admission by party opponent, as though set forth herein in the first instance.

68. My personal religious beliefs are in issue. So, I am providing additional facts concerning these relevant issues

69. I am a Christian, and I find guidance in the Bible.

70. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great.

71. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve.

72. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, Isaiah 14:13-14, Satan wanted to live for himself. He wanted to be his own God. Satan did not want to lay down his love for God, by in part loving others as himself, even outsiders, even the least of these. (Also see, Ezekiel 16:49, People were damned to hell for their unconcern "they did not help the poor and needy."); (Also see Matthew 13:18-19 "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, Luke 17:26-34 where Jesus also gave us examples of people

merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, Matthew 7:21 "Only those who do the will of God, go to heaven.); (Also see, Matthew 16:24, Luke 9:23, Matthew 10:38, and Mark 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

73. We are called to love those beyond our own even our opponents. (See, Matthew 5:43-78, Luke 6:27-36, and Romans 12:14-2, regarding loving your enemies. Also see, Exodus 22:21, Deuteronomy 10:19).

74. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.

75. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a

stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children...").

76. Jesus said even those without God love those who love them, and greet those who great them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?").

77. I believe God calls us to love God foremost and to love others, even those outside of our own, even our enemies, as ourselves. (See, Matthew 22:36-40, The greatest command in the bible is to love God. Subordinately, Love others as yourself. All commands are weighted on these.).

78. I believe leaders who serve themselves and those who serve them are not good leaders. They are misleaders and deceivers, not public servants. They mislead and deceive those they purport to serve, to instead exploit them, to serve themselves by placing self first. Servants of Self are Servants of Satan. They not only harm those they are charged to care for in this life, they also mislead and deceive others to become Servants of Self, Servants of Satan too, thereby leading many to hell too.

79. I believe President Trump's focus on putting self first misleads and deceives people to reflect the image of Satan by learning to love money and merriment, profit and pleasure more than other people.

80. Instead of loving one another, people wrongly learn to love money to the extent that they are willing to harm and destroy human life, and eternal life to serve their fleeting fancies for funding and temporary desires.

81. I believe President Trump's winning at all costs, even at the cost of cheating, violating greater laws, of justice, mercy and faithfulness (See Matthew 23:23), makes us all lose, modeling the reflection of the image of Satan called the "lawless one" by his disregard of laws that teach us to care about other people. (Citing, 2 Thessalonians 2:8, also see Psalm 101:3); (I define evil as absence of love because "God is love." 1 John 4:16, People

without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love).

82. I believe some Republicans in office teach the image of Satan, the lawless one, as good by teaching everyone for themselves under the facade of responsibility, without love or concern for outsiders or those beyond their own, misleading those they serve to harm and hell. (Citing, 2 Thessalonians 2:8).

83. It makes me sad because I believe some Republicans in office violate the First Amendment and God's laws by using God's name for their own vanity, meaning their own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.

84. Sadly, I believe people go to hell for their confusion. Satan, the lower case god of this world, confuses to kill eternally. Pull 2 Corinthians, Chapter 4 to confirm.

85. So, I seek to draft laws to alleviate confusion as to what is good and evil, to correct not to condemn, to prevent harm in this life and eternal life.

86. I also seek to be in a position to impeach President Trump since it is likely he will win by cheating, election hacks.

87. The prophets in the Old testament, John the Baptist, Jesus and the apostles all bravely and courageously confronted leaders who did evil, by serving themselves instead of those they were charged with serving.

88. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President by seeking a position that will allow me to impeach him, in hopes to heal not only the victims of the harm he causes, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political affiliations, races, religions, and places of origin, even if they do not know God, even if they have not accepted God's love. President Trump sins against God and man by harming others to serve self. (Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38, Exodus 31:3, Numbers 11:17, Numbers 11:25); See, Deuteronomy 34:9, "The holy spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10 The Holy Spirit is also called the "spirit of the Lord" The holy spirit works the same in the Old testament too. It is the same God.); (Also see, Romans 8:14 "those who are led by the Spirit of God are children of God.,"(emphasis intended)); (Also see,

Psalm 51:13, Wisdom 1:5, See the entire book of wisdom too, See, Matthew 1:18); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but **whoever speaks against the holy Spirit will not be forgiven, either in this age or in the age to come.**" (emphasis intended)); (See, Matthew 28:19 "Go therefore and make disciples of all nations, baptizing them in the name of the Father, and of the Son, and of the **Holy Spirit.**"); (See, Mark 13:11, Mark 12:36, Mark 3:29, Matthew 3:11, John 14:26, John 16:13, John 14:17, Ephesians 1:13, 1 John 4:6); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of spirit receiving eternal life the same as Moses and Daniel did in the Old Testament.).

89. In Ezekiel Chapter 34:1-10, God scolds leaders, shepherds who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id. (Also see, Jeremiah 23:1, and Zechariah 11:17).

90. My religious beliefs prevent me from gathering money or signatures in adherence to the requirements under 15 Del.C. § 3103.

91. Even if I had the money to pay my religious beliefs prevent me from paying the filing fee.

92. Payment of the filing fee violates my freedom not to speak and freedom not to encourage conduct, payment and use of money that I believe leads myself and other people to harm and hell. I believe it is wrong.

93. I believe paying the filing fee is a sin against God.

94. I will not collect donations or signatures from individuals or lobbyists as this violates my religious beliefs against partiality and favoritism, serving those who serve me, thereby serving myself, by potential invisible strings attached to such donations.

95. I am a Democrat because they love people, not money. Democrats tend to serve people, not greed. I believe people go to hell for seeking money in place of God. (See Matthew 6:24, and Luke 16:13, "You cannot serve God and money."). (Also See, See, Luke 19:45-48, Malachi 3:1-3, Matthew 21:12-13, Mark 11:15-19, John 2:13-17, Jesus chased people out of the temple for stealing the real treasure, people's eternal lives.); (See. Matthew 23:15, Jesus told the leaders they were making their followers twice as worthy of hell as they were since the leaders taught them to focus on money instead of God.)

96. I would be a misleader, not a leader, if I taught people to serve greed instead of teaching them to care for one another since I believe serving greed leads many to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!'). People are more valuable than money. God commands us to love people not money. In John 13:34, Jesus said "A new command I give you: Love one another. As I have loved you, so you must love one another."

97. I am a leader because I think for myself after analyzing facts and laws. I will seek to do what is in the best interest of the American people, not what immediately pleases some of their immediate desires only to harm them down the line. That is wrong. I take responsibility for my decisions made on behalf of others, and I will not be influenced by money or support.

98. I was correct when I wrote to the Party Chair, "I do not believe the Democratic party will support me though I support their love for people and the environment over profit. I am against two positions the party heads seem to support." in the October 28 letter. (Exhibit 5, B).

99. By their failure to grant me a waiver, thereby persecuting based on my religion, this powerful group of a few, the Party, indicated they do not respect or support my freedom of religion.

100. With regards to two issues that the powerful few support since it supports their pockets, I do not encourage or support abortion and the death with dignity acts. I believe they harm people, or potential people not only here, but in eternity too. I would be a bad leader if I led people I served to harm people or themselves for mere temporary ease, comfort or profit.

101. I am against abortion. I do not believe they go to heaven. I believe they were robbed of the opportunity to be born of flesh and born of spirit. (See John Chapter 3:3-8, “Jesus replied, very truly I tell you, no one can see the kingdom of God unless they are born again. ... Jesus answered, very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit gives birth to spirit...”). Accordingly, the potential people not only lost life in this life, they lost eternal life too. (Also see, Ezekiel Chapter 9 Children can choose a way of life leading to hell too).

102. I am also against the Death with Dignity Acts. Many people may make mistakes, even professionals and experts such as doctors and health care professionals. None of us are gods. They may misunderstand or

may lie for money or convenience. So great injustice may result. Ignorance or error will not reverse the harm done.

103. Further, I believe people may go to hell for killing themselves. It is not loving to encourage those you serve to die and go to hell out of convenience, comfort, or martyrdom for the temporary convenience for themselves or other people, or to save money. People are more valuable than money, things or comfort. There are two examples of people who killed themselves and went to hell in the bible. King Saul in the Old Testament, and Judas Iscariot.

104. Pursuant to 1 Samuel 31:4, "...Saul took his sword and fell on it." Saul killed himself. In 1 Chronicles 10:13 provides, "Saul died because he was unfaithful to the LORD; he did not keep the word of the LORD..." I do not believe he went to heaven because of these words.

105. The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekels back. Unfortunately, he gave into despair instead of repenting by faith and trust in God's love and mercy. He killed himself instead of living to love God and love those God loves, everybody even our enemies.

106. In John 17:12, Jesus says. "he was doomed to destruction." So, I do not believe Judas escaped Satan's goal damnation.

107. I believe we live or die for God. Citing, Romans 14:8. Those who live and die for self or for mere people instead of God do not go to heaven.

108. I believe Jesus was not kidding when he said you who love mother and father more than me are not worthy of me. You who love son and daughter more than me are not worthy of me are not worthy of me. (Citing, Matthew 10:37).

109. I believe Jesus was not kidding when he said unless your “righteousness exceeds that of the scribes you will” not go to heaven. Matthew 5:20. I believe our righteousness exceeds that of the scribes by our trust in God.

110. The Bible teaches, Abraham believed what God said. His belief was attributed to righteousness. Citing, Genesis 15:6. Abraham listened to God to the point he was willing to sacrifice his own son.

111. I believe this righteousness was attributed to Lot when he listened to God’s word through messengers, the angels. He did not even turn around when his wife turned into a pile of salt. (See, Genesis 19:26).

112. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those

with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.

113. I believe Jesus teaches us by this parable that: yes, we love others, and yes, we love ourselves, but we love God more, and live for God foremost not for self or others. Id.

114. Thus, we should obey the greatest command to love God by living for God and subordinately to love one another. Love does not encourage harm in this life and eternal life for mere material convenience. (See, Romans 13:10).

115. I am against the Death with Dignity Acts because I believe the most important time of our lives is at the end pursuant to the Bible. In Ecclesiastes 7:1, “the day of death better than the day of birth.” In Ezekiel, the Bible says if you do good all of your life and turn away from the good, none of the good will be remembered. In Ezekiel, it says if you do evil all of your life and turn away from the evil, none of the evil will be remembered. (See, Ezekiel 18:21-24, Also see Ezekiel 33:12-16). Further, in the Parable of the Sower in Matthew Chapter 13, only those who understood and kept

the truth in the end were saved from hell. Also, in Matthew 24: 13, we learn that only those “who stand firm in the end” will be saved.

116. On an aside, I believe non-Christians may go to heaven (or hell) through Jesus on that last day. See, Hebrews Chapter 11. Also see the verses about the new covenant written on our hearts. When I think of tribes in unreachable parts of the land I think of Romans 2:15. “They show that the requirements of the law are written on their hearts, their consciences also bearing witness, and their thoughts sometimes accusing them and at other times even defending them.” (See also, Jeremiah 17:1, Jeremiah Chapter 31, Nehemiah 7:5, Ezekiel 36:26 relating to God’s law or God written in our heart.)

117. I understand with the acceptance of the cloak of government power I will lose some of my power to speak on my personal religious beliefs in order to uphold the freedoms of those I serve and prevent a chilling effect.

118. My beliefs are genuine.

119. I ran for local office and espoused the same beliefs on collecting donations and fundraising. (Please see Exhibits, 21, 22, 23, 24, 25).

120. My faith in Christ is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit, 26).

121. I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibits 27, 28).

122. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 29); (Also see, Leviticus 19:15 ""You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

123. I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 30). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

124. I believe it would be wrong to pay the filing fee and/or to collect signatures or donations from anyone even the Party or the

Democratic groups, as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with money or benefits such as signatures. We are not supposed to buy or barter for via collecting signatures or pay for party or people's favor, loyalty or support for allowance on the ballot either. That is a sin against God. (See, James 2:1, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

125. Paying the filing fee and/or accepting signatures or donations from individuals or groups, even democratic groups, creates an expectation of a return in violation of God's instructions. In Romans 13:8 the Bible teaches: "Owe nothing to anyone except for your obligation to love one another..." The acceptance of money from individuals and lobbyists creates an appearance that I am bought. The paying of the filing fee allows the Party to use the fee to buy the support of candidates or for candidates. That violates the bibles teachings on impartiality.

126. I believe it is wrong (a sin against God) for the Party to pay a team to support their interest or candidates.

127. I believe it is wrong (a sin against God) for the Party to donate to candidates, as it is likely to lead to buying of favors and influence in violation of my faith in God.

128. The filing fee is used to buy votes, by buying support. That is wrong. Votes should not be bought.

129. I believe it is wrong for candidates to teach people wrong by teaching the voters they earn support with money.

130. I seek to gain support with true leadership, love for others, by service to others by presenting my plans to take care of Americans relating to healthcare, social security, and the environment.

131. I believe the vote is the only non-corrupt, impartial means to show support or lack thereof.

132. No one knows how anyone votes, accept them and their God unless they disclose it.

133. Thus, the right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected.

134. On an aside, to alleviate your fears, I understand there are not only checks and balances within the three branches of government, there are also internal checks and balances within each of the individual branches.

135. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold the rights of those I hope to serve.

136. My rights to speak out on my faith will be more limited in order to uphold the religious freedoms of the American people should I be elected.

137. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government.

138. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love outside of my own. I am commanded to.

139. Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request Defendants filing fees and/or signature requirements be waived under 15 Del.C. § 3103.

**III. POLITICAL PAST, A GLIMPSE OF CORRUPTION,  
BARTERING & BUYING CANDIDATES, SERVING POWER AND  
PROFIT INSTEAD OF PEOPLE**

140. I am a registered democrat.

141. I previously ran for office in 2018 for the State House of Representatives Seat for the 38<sup>th</sup> District as a Democrat.

142. I paid the filing fee during that time, and accepted donations from Democrats during that time. (See Exhibit, 31).

143. Due to religious reasons, in 2018, I only accepted donations from the formal Democratic groups.

144. In 2018, people told me we would get our filing fees back because that was the custom.

145. In 2018, no one running in Sussex received their filing fee back per the County Democrats.

146. In an Email attached hereto as Exhibit 32, dated September 18, 2018, I responded to Jane Hovington's determination and or the Sussex County Democrat's determination that no Sussex County Candidates would receive their filing fee back:

"Hi Dolce, Thank you for stepping up to help us. I am not accepting donations from anyone, but the Democratic party groups for religious reasons. I am a Christian. I do not want to violate Matthew 6 and support the false praise of President Trump for his alleged charitable works.

People in Sussex support him, though his conduct is not praise worthy. He is misleading so many people I love.

We should lay a foundation for success not only for this election, but for future elections. I'm disappointed the Democratic Party for the state has not helped me either. I grew up in Sussex. I was raised here. The reason why so many do not support our party is because they do not believe we support them. My neighbors lament that the democrats only care about upper Delaware, not lower Delaware. We have more people running on the democratic ticket this year than other years. If Sussex Democrats are merely concerned with the federal and Presidential elections, that actually may confirm the false beliefs of my neighbors and hurt the democrats down the line.

Democrats care about everyone, we are the party of inclusion. We care about the North, upper Delaware, and the South, lower Delaware, and everything in between.

Please help me, help you bring the blue back. Please help the other candidates too.

Thank you,

Meg" (See, Exhibit 32)

147. The County Democrats indicated they would support the national and federal elections not the county seats. They would not return the filing fees back like they allegedly did in prior years.

148. In addition, the 38th District kindly helped me by a donation. (See, Exhibit 33).

149. Yet, the 38th District misstated the amount the group was allowed to contribute to be a lower amount than the \$3,000.00, allowed limit per candidate.

150. I sent the 38th District members an email to correct the miscommunication of the amount candidates were allowed to receive was \$3,000.00 from democratic groups not a lesser amount. (See Exhibit 34)

151. I believe the fact the County Democrats did not support local candidates and the misstated lower fee of campaign limits evidences both the County Democrats and the 38th District Democrats were compromised into serving those who serve them, supporting those who support their pockets, or personal interests, not who will do what is right.

152. This is an example of why I believe the filing fees, and donations contribute to the corruption in politics, while also violating Jesus Christ's teachings. The fees and donations teach people to reflect the image of Satan, serving those who serve them thereby serving themselves, instead of seeking to do what is right, not self serving.

153. Please note, the emails relating to the 2018 examples, was before I became wiser. more educated and learned the corruption relating to paying filing fees was a wrong. It is a sin.

154. Sadly, I learned that Democrats try to buy different democrats too, thereby compromising their integrity and their eternal souls.

155. Thankfully, I believe there is no condemnation in Christ, so long as I turn away from the sin of paying the filing fee and accepting

volunteers or checks from the Democratic Groups too, and turn towards God's will.

156. I have since 2018, realized that paying the filing fee would violate Jesus Christ's teachings, and be a sin against God.

157. I have since 2018, realized that accepting volunteers, and donations, even volunteering signatures from the Democratic organization or others violate Jesus Christ's teachings too.

158. During 2018, I told the members of the 38th Democrats I would not take donations or give donations from individuals.

159. Many participants in the 38th District appeared to be involved in other groups and entities that asked for donations. Yet, I would not buy votes by giving money to those who purport to support me thereby sinning against God by supporting myself. Nor, would I accept money or volunteers from such group thereby allowing myself to be bought, or to become biased, or compromised by the desire to serve myself at the expense of those I hoped to be charged with serving.

160. I am priceless, not a price tag.

161. People are priceless not price tags, to be bought or bartered for with filing fees, donations, signatures, and such thereby compromising their integrity to do what is right instead of what is self serving.

162. Such groups have narrow interests, not necessarily focused on serving people outside of their own with additional and different interests, yet important too.

163. Thus, when members of groups, such as the Party, give donations to candidates, they compromise the candidates' ability to serve those they are charged to serve with the temptation to serve those who serve their seat instead.

164. I faced disdain and persecution related to my religious beliefs because of the unusual manner I campaigned back in 2018.

165. One of the head Democrats demeaned me in front of everyone at a meeting, Dr. Mohammad Akhter. (See, Exhibit 35, Also see Exhibit 38, regarding information relating to conflict with major campaign contributors to both parties, the healthcare industry, and the apparent agenda that Dr. Mohammad Akhter purported to support).

166. Even more insultingly, I discovered most of the people at the meetings did not read my campaign material or the few articles I drafted in the local paper, the Coastal Point

167. I believe some of the powerful democratic members only cared about what they could personally get out of me, and not anything beyond that, including how well I could serve. (Reflecting the image of Satan. (See,

Isaiah 14:13-14.); (Cf, Matthew 23:11 "The greatest among you is your servant." Servants of self are not great. They mislead and deceive those they purport to serve to serve themselves instead. Good leaders teach those they serve to be great too, by teaching them to serve one another not exploit and harm one another to serve greed.).

168. In 2018, I was invited to a meeting by official members of a Democratic group, where I thought the Democrats of the 38th District were offering their support, financial and otherwise because they said they were going to help me out. Instead, to my horror, they asked me not to run for the 38th House District Seat after I expended my time, effort and own personal funds on material. (Exhibit 35).

169. The powerful few democrats who chose to be involved in party picking in the 38th District thought they could buy my seat by offering to return my filing fee, and offering an alternative to run for another office, such as the Recorder of Deeds, with a waiver of filing fees.

170. They were wrong to think I was running to gain power. I ran because I wanted to make a positive difference in the lives of those I had hoped to serve via drafting and amending laws to serve people and to protect them from exploitation by those who serve greed. Mere power is not what I seek,

171. I contacted Jane Hovington, a big whig in the Sussex Democratic Party, concerning her lack of support or knowledge of my legislative agenda. (Exhibit 36, concerning emails and the attachments thereto, relating to our communications).

172. To my horror, many of those within the party did not educate themselves about local candidates, including myself. It seemed like a mere job that some were paid to care about, and their concern did not go beyond their paid support.

173. At one instance at the Democratic headquarters, I tried to calm down a member (herein referred to as "the Member") of the Democrats after she called Robert Arlett ugly words.

174. I said we should adhere to Michelle Obama's saying "When they go low. We go high."

175. The Member responded by pointing her finger at the door of the headquarters for me to get out, while indicating she had more experience and I knew nothing because of my youth.

176. I left the Democratic headquarters.

177. I forget the Member's exact words, but I communicated with Jane Hovington ("Jane"), who observed this event concerning this event.

178. Instead of comforting me after such harsh remarks, Jane instead sympathized and thus encouraged the misbehavior based on the Member's fleeting feelings, instead of encouraging the Member to control her feelings (instead of allowing them to control her), and to respect others, including me, regardless of age and apparent experience in politics.

179. I forget what the exact words the Member said, but I followed up with the attached email to Jane Hovington in addition to contacting her by phone, from a number I no longer have.

180. I sent Jane the scripture regarding let no one demean you because of your youth, with a picture of the attendees at the meeting where the event occurred. The lady sitting next to me, wearing the Carper shirt, was the lady who forced me to leave. I do not know her name, but it is notable I saw her picture is on a sign on Route 26 near Hockers, advertising the health industry. This is the industry I desire to draft laws to prevent the massive killing and bad care I have learned about throughout history, and via recent history, by inter alias its contribution to the addiction crisis and the alleged molestation of babies by Dr. Bradley in Delaware. (Exhibit 37).

181. Jane openly professes her faith in Christianity. So, I did not fear offending her by citing the Bible.

182. I also sent the attached emails to Jane concerning her, and thus the Democrats, lack of support for my campaign. (Exhibit 36).

183. On the day of the election, I visited all of the voting stations in the 38th District in lower Delaware.

184. To my horror, most of the voting stations only handed out the attached anti corruption handout, not the handout with my platform. So, the stations did not allow voters to read about the good I hoped to do. Instead, they merely were able to read my anticorruption hand outs that cited the Bible and the fact I would not participate in fundraising events due to my belief in Jesus Christ's teachings. So, it made me look unusual and possibly weird or offensive to those who do not believe the same on the most important day, election day. (See, Exhibits 21 and 22).

185 In fact my anticorruption handout did upset someone early on.

186. Prior to the election in 2018, I received free training in Dover where someone looked at my material and scolded me. She was offended by my quote from Jesus Christ on the anticorruption brochure relating to the fact I was not going to attend fundraising events. She said she was going to support me, but was no longer supporting me because of the quote. She was so angry at me. (See, Exhibit 21).

187. Sadly, I amended my brochures to change the word temple into "places of worship" or something similar, since she was Jewish. I did not desire to offend her. I merely desired to obey Jesus Christ by not participating in fundraising.

188. The anticorruption handout originally included, in part:

"I was thinking about doing fundraising at restaurants, but changed my mind when someone asked me to go to a dinner fundraiser because it would be good for my campaign.' I immediately thought of the scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the temple; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. "(emphasis intended).

189. I changed the handout to replace "temple" with "[ places of worship]" in a revised handout providing, in part:

"I was thinking about doing fundraising at restaurants, but changed my mind when someone asked me to go to a dinner fundraiser because it would be good for my campaign.' I immediately thought of the scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the [places of worship]; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. " (See Exhibit 21, emphasis intended).

190. I felt sad for changing Jesus Christ's words based on the discomfort it caused others, and one lady specifically.

191. On election day in 2018, as I visited each of the voting stations in the 38th District in Delaware, I also saw the boards I created for each of

the stations were knocked down. So, people could not read the newspaper articles or brochures I placed on the boards.

192. I lost the election in 2018. I had little support from the Democrats. Though some offered to hand out papers for one day, but required my mother and I to perform their job of handing out all the Democrats papers to certain listed locations. So, they used me for their personal agenda instead of supporting me, which reflects the corruption in politics. (See Exhibit 44, a picture of one of the people offering to hand out my material with my mother, only in exchange that I hand out other Democrats stuff, thereby reflecting the corruption in politics (while violating the Bible's teachings), by doing what is self serving, not what is right.)

193. Jesus, in Matthew 6 teaches "Do not give your (charitable) alms seen. Do not be like the hypocrites." When you give charitable love "do not know your left hand from your right hand," meaning do not give out of one hand to get out of the other. Giving to get something in return, such as asking folks to volunteer signatures or donations or to door knock, in exchange for something, such as supporting their personal desires instead of what is best for the people, not only compromising the integrity of the candidates running for office, it also misleads and deceives people to harm and hell, under the guise of good.

194. Jesus teaches do not charity give seen period. I believe people are damned to hell because of the deception volunteering, including volunteering signatures, volunteering donations, fundraisers, girl scout cookie sales, car washes, alleged charitable races, school pizza drives, donations to organized groups or organized charities, go fund me pages and the like wrongly teaches people.

195. It is no small sin. Teaching giving to get, is unconditional charitable love, wrongly drives out the love from the hearts of man, the God from the hearts of man because "God is Love", and replaces it with the love of money, or the desire to serve self, instead of unconditionally loving and respecting others, without requiring they earn it.

196. This evil done under the guise of charitable good teaches people wrong. The Bible teaches people go to hell because they learn wrong, and do not unlearn deception as truth. People go to hell because of their hard-hearted ignorance, misunderstanding, and for not knowing truth. Not knowing is not innocence. It is evidence of guilt, not caring to know, caring to love. Even children may be damned to hell on judgment day. To confirm, pull Ezekiel Chapter 9. (See, Isaiah 44:18 regarding "stupidity and ignorance" that damns); (Also see, Ephesians 4:18, Romans 1:21); Also see, Matthew 13 the Parable of the Sower, only those who understood were