

With regards to the the case before you, I am not so sure whether counsel would be sin. I need to pray about it. The cases relate to my religious beliefs. My beliefs are at issue. Most people believe differently, even my own family. I did look into whether they would help, and was not able to receive help due to conflicts or other reasons.

My belief in Jesus Christ, what he says, is not popular. Jesus commands us to call no one our teacher but God. I believe churches will go to hell as they mislead many there for asking other people for money to give to others, instead of merely asking for their own needs, or giving from self in secret to care for others with no worldly reward, not taking from others to give to those in alleged need, in direct violation of Jesus Christ's commands in Matthew 6:1-5. This same religion religious violation, Matthew 6:1-5, is why I sued the democrats to run for office without violating my faith as asking for signatures or donations would compromise my beliefs, wrote the US Supreme Court concerning running for President, and is a major concern in the lawsuit I filed against President Trump, and hoped to file against president Biden by substitution.

I believe the rise in religious persecution against me and others in the country relate to the executive orders I mentioned in my complaint, creating a bought or bartered for union of government-religion, that is based on business not freedom, making my God a product to buy and sell. Per John 2:16, those who worship by business are not welcome I church or in heaven per Jesus.

This belief conflicts with the beliefs of my own family, including attorneys. It appears I must stand and fall on my faith in God alone for now.

I am also perplexed by the Delaware Supreme Court's participation, should it be based on the exercise of my First amendment right to exercise religion, speak, associate and petition. I

cried about that since I look at them as potential eternal life savers, guiding the misguided with mercy and correction to prevent harm here and condemnation for eternity.

Should the Supreme Court merely care about my poverty and basic needs making the complaint to the arms of the court, instead of seeking to maliciously suppress my exercise of fundamental rights based on disdain for my religious beliefs, I would be grateful.

In that case, Defendants improperly acted. They should have waited after the case, and acted out of concern, not condemnation. I suspect the Supreme Court is defensive, and believe they seek to sue me now, for improper purposes. I am sad even thinking about the evidence indicating to their participation. Only your court can resolve this dispute.

Attached, please find my amended Motion for reagument, and a blackline thereto.

Wherefore, I respectfully request this Court grant my order.

Dated November 8, 2021

Respectfully submitted,



Meghan Kelly, Esquire

34012 Shawnee Drive

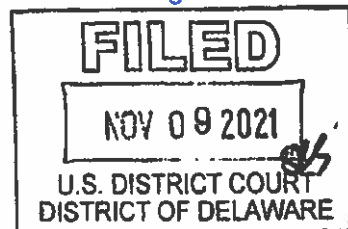
Dagsboro, DE 19939

meghankellyesq@yahoo.com

Unrepresented indigent party,

Bar No. 4968 (Word 3,319 Count)

Exhibit 1





DAGSBORO
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DAGSBORO, DE 19939-9998
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11/06/2021 12:00 PM

Product	Qty	Unit Price	Price
First-Class Mail® Large Envelope	1		\$2.36
Wilmington, DE 19801 Weight: 0 lb 6.20 oz Estimated Delivery Date Tue 11/09/2021			
Certified Mail®			\$3.75
Tracking #:	70210350000131665646		
Return Receipt			\$3.05
Tracking #:	9590 9402 6766 1074 8891 56		
Total			\$9.16
First-Class Mail® Large Envelope	1		\$2.16
Wilmington, DE 19801 Weight: 0 lb 5.90 oz Estimated Delivery Date Tue 11/09/2021			
Certified Mail®			\$3.75
Tracking #:	70210350000131665653		
Return Receipt			\$3.05
Tracking #:	9590 9402 6766 1074 8891 63		
Total			\$8.96
Grand Total:			\$18.12
Cash			\$20.00
Change			-\$1.88

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9495 9496 9497 9498 9499 9500 9501 9502 9503 9504 9505 9506 9507 9508 9509 9510 9511 9512 9513 9514 9515 9516 9517 9518 9519 9520 9521 9522 9523 9524 9525 9526 9527 9528 9529 9530 9531 9532 9533 9534 9535 9536 9537 9538 9539 9540 9541 9542 9543 9544 9545 9546 9547 9548 9549 9550 9551 9552 9553 9554 9555 9556 9557 9558 9559 9560 9561 9562 9563 9564 9565 9566 9567 9568 9569 9570 9571 9572 9573 9574 9575 9576 9577 9578 9579 9580 9581 9582 9583 9584 9585 9586 9587 9588 9589 9590 9591 9592 9593 9594 9595 9596 9597 9598 9599 9600 9601 9602 9603 9604 9605 9606 9607 9608 9609 9610 9611 9612 9613 9614 9615 9616 9617 9618 9619 9620 9621 9622 9623 9624 9625 9626 9627 9628 9629 9630 9631 9632 9633 9634 9635 9636 9637 9638 9639 9640 9641 9642 9643 9644 9645 9646 9647 9648 9649 9650 9651 9652 9653 9654 9655 9656 9657 9658 9659 9660 9661 9662 9663 9664 9665 9666 9667 9668 9669 9670 9671 9672 9673 9674 9675 9676 9677 9678 9679 9680 9681 9682 9683 9684 9685 9686 9687 9688 9689 9690 9691 9692 9693 9694 9695 9696 9697 9698 9699 9700 9701 9702 9703 9704 9705 9706 9707 9708 9709 9710 9711 9712 9713 9714 9715 9716 9717 9718 9719 9720 9721 9722 9723 9724 9725 9726 9727 9728 9729 9730 9731 9732 9733 9734 9735 9736 9737 9738 9739 9740 9741 9742 9743 9744 9745 9746 9747 9748 9749 9750 9751 9752 9753 9754 9755 9756 9757 9758 9759 9760 9761 9762 9763 9764 9765 9766 9767 9768 9769 9770 9771 9772 9773 9774 9775 9776 9777 9778 9779 9780 9781 9782 9783 9784 9785 9786 9787 9788 9789 9790 9791 9792 9793 9794 9795 9796 9797 9798 9799 9800 9801 9802 9803 9804 9805 9806 9807 9808 9809 9810 9811 9812 9813 9814 9815 9816 9817 9818 9819 9820 9821 9822 9823 9824 9825 9826 9827 9828 9829 9830 9831 9832 9833 9834 9835 9836 9837 9838 9839 9840 9841 9842 9843 9844 9845 9846 9847 9848 9849 9850 9851 9852 9853 9854 9855 9856 9857 9858 9859 9860 9861 9862 9863 9864 9865 9866 9867 9868 9869 9870 9871 9872 9873 9874 9875 9876 9877 9878 9879 9880 9881 9882 9883 9884 9885 9886 9887 9888 9889 9890 9891 9892 9893 9894 9895 9896 9897 9898 9899 9900 9901 9902 9903 9904 9905 9906 9907 9908 9909 9910 9911 9912 9913 9914 9915 9916 9917 9918 9919 9920 9921 9922 9923 9924 9925 9926 9927 9928 9929 9930 9931 9932 9933 9934 9935 9936 9937 9938 9939 9940 9941 9942 9943 9944 9945 9946 9947 9948 9949 9950 9951 9952 9953 9954 9955 9956 9957 9958 9959 9960 9961 9962 9963 9964 9965 9966 9967 9968 9969 9970 9971 9972 9973 9974 9975 9976 9977 9978 9979 9980 9981 9982 9983 9984 9985 9986 9987 9988 9989 9990 9991 9992 9993 9994 9995 9996 9997 9998 9999

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Kathleen Jennings
Wilmington DE 19801

9595 9596 9597 9598 9599 9600 9601 9602 9603 9604 9605 9606 9607 9608 9609 9610 9611 9612 9613 9614 9615 9616 9617 9618 9619 9620 9621 9622 9623 9624 9625 9626 9627 9628 9629 9630 9631 9632 9633 9634 9635 9636 9637 9638 9639 9640 9641 9642 9643 9644 9645 9646 9647 9648 9649 9650 9651 9652 9653 9654 9655 9656 9657 9658 9659 9660 9661 9662 9663 9664 9665 9666 9667 9668 9669 9670 9671 9672 9673 9674 9675 9676 9677 9678 9679 9680 9681 9682 9683 9684 9685 9686 9687 9688 9689 9690 9691 9692 9693 9694 9695 9696 9697 9698 9699 9700 9701 9702 9703 9704 9705 9706 9707 9708 9709 9710 9711 9712 9713 9714 9715 9716 9717 9718 9719 9720 9721 9722 9723 9724 9725 9726 9727 9728 9729 9730 9731 9732 9733 9734 9735 9736 9737 9738 9739 9740 9741 9742 9743 9744 9745 9746 9747 9748 9749 9750 9751 9752 9753 9754 9755 9756 9757 9758 9759 9760 9761 9762 9763 9764 9765 9766 9767 9768 9769 9770 9771 9772 9773 9774 9775 9776 9777 9778 9779 9780 9781 9782 9783 9784 9785 9786 9787 9788 9789 9790 9791 9792 9793 9794 9795 9796 9797 9798 9799 9800 9801 9802 9803 9804 9805 9806 9807 9808 9809 9810 9811 9812 9813 9814 9815 9816 9817 9818 9819 9820 9821 9822 9823 9824 9825 9826 9827 9828 9829 9830 9831 9832 9833 9834 9835 9836 9837 9838 9839 9840 9841 9842 9843 9844 9845 9846 9847 9848 9849 9850 9851 9852 9853 9854 9855 9856 9857 9858 9859 9860 9861 9862 9863 9864 9865 9866 9867 9868 9869 9870 9871 9872 9873 9874 9875 9876 9877 9878 9879 9880 9881 9882 9883 9884 9885 9886 9887 9888 9889 9890 9891 9892 9893 9894 9895 9896 9897 9898 9899 9900 9901 9902 9903 9904 9905 9906 9907 9908 9909 9910 9911 9912 9913 9914 9915 9916 9917 9918 9919 9920 9921 9922 9923 9924 9925 9926 9927 9928 9929 9930 9931 9932 9933 9934 9935 9936 9937 9938 9939 9940 9941 9942 9943 9944 9945 9946 9947 9948 9949 9950 9951 9952 9953 9954 9955 9956 9957 9958 9959 9960 9961 9962 9963 9964 9965 9966 9967 9968 9969 9970 9971 9972 9973 9974 9975 9976 9977 9978 9979 9980 9981 9982 9983 9984 9985 9986 9987 9988 9989 9990 9991 9992 9993 9994 9995 9996 9997 9998 9999

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844 North King St Unit 15
Wilmington, DE 19801-3510

Please attach to
Meghan Kelly's Motion for
Reargument Case 21-1490
(CFC)
Thank you.

Exhibit 2

Fw: 1643532266; ROBERT KELLY

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov; ryan.costa@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Tuesday, November 2, 2021, 07:52 PM EDT

Good evening,

Good evening,

I will be without my computer, as it gets repaired.

Please forgive me for any delays in responding to these most urgent matters.

Very truly,
Meg

On Tuesday, November 2, 2021, 09:56:08 AM EDT, AMAZON APT <amazonapt@asurion.com> wrote:

Hello! You can reply back with pictures to this email n we can forward to the servicer however the unit will still need to be sent in as well. Make certain that you include detailed info as to what it is doing n not doing as well. Thanks again for all of your help!

34012 SHAWNEE DR

DAGSBORO DE 19939

UNITED STATES

Thanks again for all of your help!

glendon

[asurion.com](https://www.asurion.com)

asurion

 IMG_1906.JPG
1.3MB

 IMG_1907.JPG

Exhibit 3

Your repair is still underway

From: Product Protection Team (statusupdate@retail-email.asurion.com)

To: meghankellyesq@yahoo.com

Date: Monday, November 8, 2021, 12:34 AM EST

asurion



Repair in process.

Your repair is still in the works.

For more details, check the status of your claim. We'll let you know soon about next steps.



Service request (SR#): 1643532266

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Do not reply to this message.

Exhibit 4



Azure

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Request Status Change

DELAWARE SUPREME COURT**APPLICATION FOR A CERTIFICATE OF INACTIVE STATUS****To the Supreme Court of Delaware:**

Pursuant to Supreme Court of Delaware Rule 69(d)(i), I herewith apply for a Certificate of Inactive Status and state that I am not actively engaged in the practice of law in Delaware. I have completed and returned my Annual Registration Statement.

I certify that there are no charges pending or threatened against me before any court, the Board on Professional Responsibility, or any similar disciplinary agency in this or any other jurisdiction. I further certify that I do not know of any facts respecting my conduct which would result in the filing of charges or disciplinary action against me.

Supreme Court ID 004968

SIGNATURE

/s/John Q. Public, Esq.)

(e.g.

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All questions regarding the Annual Registration Statement should be directed to Lisa A. Dolph, Clerk of the Delaware Supreme Court, by telephone, (302) 739-4155, or e-mail, lisa.dolph@delaware.gov.

All questions concerning the Certificate of Compliance or Pro Hac Vice Renewals should be directed to The Lawyers' Fund for Client Protection (LFCP):

Last Name A-Z - Mason Vannucci, (302) 651-3930, Mason.Vannucci@delaware.gov

All questions concerning CLE should be directed to The Commission on Continuing Legal Education (CLE):

Last Name A-N - Margot Millar, (302) 651-3941, Margot.Millar@delaware.gov

Last Name O-Z - Mason Vannucci, (302) 651-3930, Mason.Vannucci@delaware.gov

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Exhibit 5

Page 001	Report Date 11/06/2021	Agency TROOP 4 STATE POLICE	Complaint Number 04-21-082395
Reported Date and Time Sat 11/06/2021 1218		Field Service Report	Occurred Sat 11/06/2021 1218
Location: 34012 Shawnee Dr, Black Water Village, Dagsboro, DE 19939 0.02 Miles Southwest of Traff			
Grid 202 - 074	Sector 44	County Sussex	Domestic Related <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Officer Weapon Involved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Officer Weapon Type:	Officer Weapon Use:
Gen Broadcast Sent? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Gang Related? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Gun Related? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Emergency Order Related: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Here Help Referral: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Crimes and Associated Information

Victim Number 000	Crime Seq 001	Status	Crime Description
Location of Offense		Status	Involvement <input type="checkbox"/> Alcohol <input type="checkbox"/> Drugs <input type="checkbox"/> Computer
Suspected Hate/Bias <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No - N/A		Crime Code F020 - Check on Well Being	General Offense

Witness Information

Sequence 001	Type Person Contacted	Name KELLY, MEGHAN M	Sex Female	Race White
34012 Shawnee Dr Blackwater Vlg Dagsboro, DE 19939			Home Tel	Cell Phone
Sequence 002	Type Reporting Person	Name IERVOLINO, APRIL D	Sex Female	Race White
33594 Herring View Dr Lewes, DE 19958			Home Telephone	Cell Phone
Employer/School POST OFFICE 28290 Clayton St United Post Office Dagsboro, DE 19939			Work Telephone (800) 275-8777	

Investigative Narrative

I was dispatched to a check on the welfare of PC-1 Meghan Kelly at above location. I responded to above location and made contact with PC-1 Meghan Kelly. She advised that she was okay and I explained that the RP April Iervolino called because she did not see her when she delivered the mail today. RP April wanted the police to check on her well being.

I attempted to call back the RP April with negative results as the Dagsboro Post Office was closed.

I cleared the check on the welfare by Service Clear and no further action was taken.

Reporting Officer M/CPL PARTYKA - 00179 0	Supervisor Approval Andrew Partyka PSPT179 11/06/2021
Detective Notified	Referred To
Solvability <input type="checkbox"/> Witness <input type="checkbox"/> Suspect Located	<input type="checkbox"/> M.O. <input type="checkbox"/> Suspect Described
<input type="checkbox"/> Trace Stolen Property <input type="checkbox"/> Suspect Identified	<input type="checkbox"/> Suspect Named <input type="checkbox"/> Suspect Vehicle Identified
Status Closed	

Exhibit 6

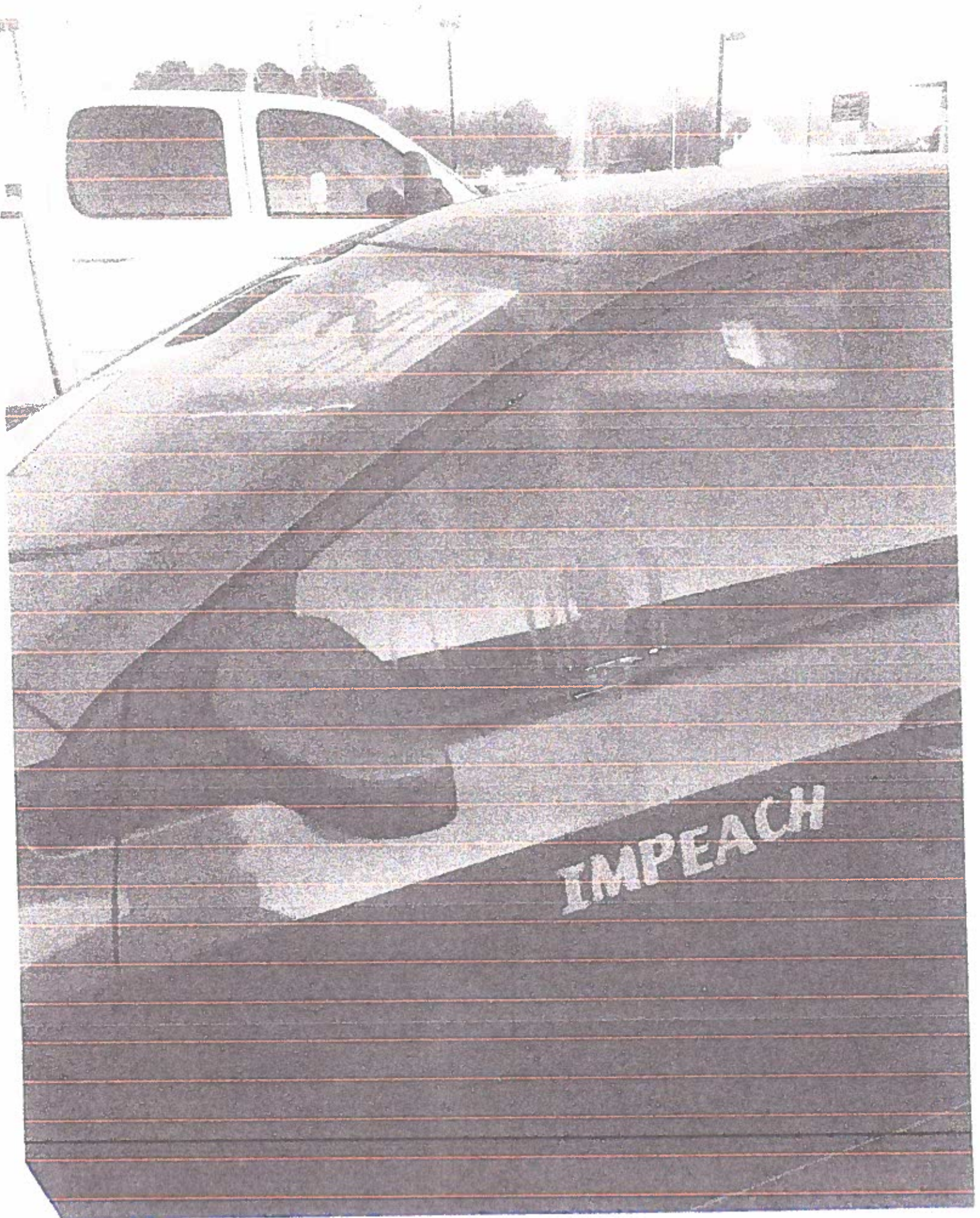


Exhibit 7

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 Amended Motion for Reargument

Plaintiff Meghan Kelly, pro se, brings this motion for reargument pursuant to FRCP Rule 59(e), and D. Del. 7.1.5 (a), on the order (D.I 17) in objection to and request to vacate each and every one of the court's findings denying my motions to expedite, for a temporary restraining order, a preliminary restraining order, exemption from bond, for emergency relief, motion to appear remotely, motion to electronically file, with a waiver of electronic filing fees, abstention under the *Younger* and the dismissal of this case, based on supremacy of federal law, the absence of opportunity for relief in state courts, essentially eliminating my ability to protect my fundamental rights through access to the courts in exchange for my license to practice law, sacrificing individual liberties including my religious exercise, speech, association and petitioning the court for relief against disparate treatment towards me by government agents motivated by their disagreement with my religious exercise, petitions, poverty, association and or speech. (D.I. 1-19).

The Court erred as a matter of law by denying all of my motions and dismissing my case per the arguments and facts stated therein. I face irreparable injury that cannot be addressed or prevented in state court, only this court has jurisdiction to grant relief, under the facts of this case. The Court must consider my pleadings before dismissing my arguments, which cannot be brought in other courts as claims.

I also seek to vacate the Order because the Court erred as a matter of law by disregarding all my pled facts, pled legal arguments. The Court abused discretion by disregarding the facts and legal arguments I pleaded in the complaint and motions, and by making no determination on such arguments

considering the immediate irreparable injury I continue to face. The Court made an error of apprehension. *Id.* Even on a Motion to dismiss the Court is required to consider “whether the allegations on the face of the complaint, taken as true, allege facts sufficient to invoke the jurisdiction of the district court.” *Licata v. U.S. Postal Serv.*, 33 F.3d 259, 260 (3d Cir. 1994). The Court abused its discretion by ignoring, failing to address all the facts and pleadings in my complaint and motions before dismissing a case, related to fundamental rights requiring strict scrutiny to be upheld. Defendants face no irreparable harm. I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. I sought to make a difference differently by attempting to revise the laws over the years. I believe religion and state must be separate. People should worship or not according to the dictates of their conscience, not the dictates of the government through their partners, including religious entities. When my religious liberties were at stake, I gave up public office aspirations for God, in hopes the Courts would safeguard our religious freedoms.

I am not asking the Court to make a disciplinary determination. I am asking the Court to, *inter alias*, (1) enjoin the Disciplinary Proceedings until a determination is made, leaving time for appeals to determine whether the conduct by the defendants violated the first amendment applicable to defendants pursuant to the fourteenth amendment concerning my free exercise of religion, speech, association, and petitioning the government to address grievances, 42 USC §§ 1985(2), 1983 (“federal law”), and (2) determine whether the proceedings themselves are a violation of federal law. (D.I. 1, 2, 3, 4, 9, 10, 7, 8, 6, 12, 11, 14.) (1) The conduct by Defendants and the coconspirators as pled are a violation of federal law, and (2) the proceedings themselves are a violation of federal law. (D.I. 1-19). I did not ask the court to conduct a disciplinary trial.

The Court abused its discretion by ignoring the laws, facts and analysis in my pleadings and motions. The Court abused its discretion by failing to grant me relief in my motions, disregarding all facts and legal arguments. Injunctive relief while the main relief, is not the only relief I requested. Protection of my freedom of speech, religious exercise, association and right to petition, despite religious

beliefs, poverty, unemployment, and profession is something I seek to protect which is far greater than my active license to practice law, or all the money in the world, for freedom cannot be bought and sold.

The Constitution and Federal laws supersede state law arguments. The court ignored superseding constitutional issues, arguments and facts related to those issues, blinding its eyes guaranteeing injustice towards me, and similarly situated parties who are not below the law by poverty or pro se status, but are afforded Constitutional protections to exercise their First Amendment rights without retaliation or interference by government agents acting under the color of law seeking to suppress or punish claimants for their exercise of fundamental liberties. The cloak of color of law by Defendants, and government agents, does not give the government lawless reign, constitutional immunity to violate the Constitution, with no accountability for such violations by using the color of the law to obstruct and prevent my access to the courts. The color of the law acts as both the sword and shield per (D.I.15 and D.I. 16), rendering the Court and the arms of the Court above the law, above the Constitution, and must be overturned to prevent clear injustice.

The Court erred by not considering or even addressing my fundamental rights and Constitutional arguments which preempt state law proceedings.

The Court erred by ignoring the Chancery Court's staff's and Delaware Supreme Court Chief Justice' apparent participation in the retaliation, and intentional interference to obstruct, harass, interfere, or pressure me to forgo my case, Kelly v Trump, by instigating DE-Lapp and ODC proceedings against me motivated by their disdain for my personal, religious affiliated beliefs, speech reflected the same, exercise of my right to petition, poverty, association and religious exercise, in violations of 42 USC Sections 1983, and 1985(2), and First Amendment violations applicable to Defendants pursuant to the Fourteenth amendment. (D.I. 1-D.I 17).

The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed

lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the Supreme Court appears to have partaken in federal law violations against me.

It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court may seek to sue me, and I no longer have a case before them. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3).

The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be above the law and Constitution as the courts participated in the conduct which is the cause of this action. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010).

The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer's address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in

exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.). The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.).

The Court cannot clean Defendants' hands because its owns hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and

injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me.

My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since I paid my active attorney dues, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents.

The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, Kelly v Trump. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents. I should like to add nominal damages too.

The Defendants and Court agents by their positions are not above the Constitutional law, allowing them to suppress, obstruct and punish me for the exercise of my First amendment rights merely by the use of the color of law to discriminate and persecute me based on my faith in Jesus. I do not lose my right to seek relief in Court for Defendants' violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me. Defendants knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great

wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts should they overstep.

I did not sell my soul to hell for my license to practice law, nor did I become enslaved to the false God of money in exchange for my license to practice law. Any sacrifice of religious freedoms of conscience for the profit and control under the guise of order of the profession, even at the cost of human sacrifice of individual Constitutional liberties, is a sacrifice too great. I am protected under the Constitution for my religious beliefs, religious exercise, speech, petitions and association, even if I am in destitute utter poverty, an attorney, and even if Defendants find my religious associated beliefs, speech and petitions, which reflect my religious exercise and beliefs, repugnant or crazy. I am protected even if I made mistakes in court, in my desperate desire to serve Jesus by protecting God's holy name. Defendants are not immune for conduct they knew or should have known as attorneys were Constitutional violations. Immunity is removed. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015), I.D 2 at 188, 194, 201-204, 236-239, 336,

My faith in God the father, Jesus, and the holy spirit are in issue in this case, my complaint *Kelly v Trump* relating to a substantial burden upon my free exercise of religion, and are in issue, as the motive, an improper motive for Defendants' case Board Case No. 115327-B per Defendants admission per the attached complaint marked as (Exhibit 1. at 7), and per my Complaint, motions and exhibits. (D.I. 1-12, 14) Defendants bring a wrongful proceeding against me because they find my religious beliefs in Jesus, "a serious concern regarding my mental capacity." *Id.* They allege they do not understand my beliefs in Jesus "are objectively illogical; and rely on non-legal sources, including the Bible." See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.) ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") (Defendants' wrongful action against me relate

to my pleadings in RFRA action **Kelly v Trump**); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the **plausibility of a religious claim.**”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. (emphasis intended).

Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (**Exhibit 2**). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2.

My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the

government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law.


The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. My complaint intentionally refers to ideas to prevent an economic crash, prevent the elimination of social security, improve healthcare and other important issues beneficial to the public. D.I. 1-19. My speech would be diminished should Defendants be permitted to label me disabled but for my religious beliefs in Jesus. The Court did not examine the facts or legal arguments pled in my complaint. or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9).

With regards to whether Younger should apply, “The pertinent inquiry is whether the state proceedings afford an adequate opportunity to raise the constitutional claims.” *Middlesex Ethics Comm. v. Garden State Bar Assn*, 457 U.S. 423, 424 (1982). In my case there is no fair opportunity to raise constitutional claims in state court. Constitutional claims may be brought as a defense, illegality, not as a counterclaim in state court. This Court is the only venue that may afford me relief. Younger does not apply, even if it did exceptions apply. The prosecution is brought in bad faith to persecute me based on my religious beliefs reflected in my speech and petitions, and disdain towards me due to poverty. They prosecute an innocent party, not practicing law, defending my right to worship Jesus in *Kelly v Trump* without government persecution, only for Defendants to persecute me. The proceeding brought under color of law, as applied is utterly unconstitutional brought in violation of my first amendment right to exercise religion motivated to punish me for my beliefs in Jesus. Defendants bring the disciplinary proceeding to harass, humiliate, demean my speech in the public’s eyes and cause me emotional

distress, based on disdain for my religious beliefs, speech, petitions, poverty and, or association, as an impoverished unemployed attorney, acting as a party to protect something more valuable than money, freedom to worship God. Even if the state proceeding continues, this case cannot be dismissed and I must be afforded access to the courts in the only court that may afford relief to protect something more important than my license, my ability to worship God without government persecution.

Wherefore, the Court must grant this order to prevent manifest injustice or to correct clear error. (Exhibit 5)

Dated November³ 2021

Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,541 Count)

I declare, affirm that the foregoing statement is true and correct under the
penalty of perjury, dated Nov. 8, 2021

Meghan Kelly (printed)

Meg Kelly (signed)

Exhibit 8

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 Amended Motion for Reargument

Plaintiff Meghan Kelly, pro se, brings this motion for reargument pursuant to FRCP Rule 59(e), and D. Del. 7.1.5 (a), on the order (D.I 17) in objection to and request to vacate each and every one of the court's findings denying my motions to expedite, for a temporary restraining order, a preliminary restraining order, exemption from bond, for emergency relief, motion to appear remotely, motion to electronically file, with a waiver of electronic filing fees, abstention under the *Younger* and the dismissal of this case, based on supremacy of federal law, the absence of opportunity for relief in state courts, essentially eliminating my ability to protect my fundamental rights through access to the courts in exchange for my license to practice law, sacrificing individual liberties including my religious exercise, speech, association and petitioning the court for relief against disparate treatment towards me by government agents motivated by their disagreement with my religious exercise, petitions, poverty, association and or speech. (D.I. 1-19).

The Court erred as a matter of law by denying all of my motions and dismissing my case per the arguments and facts stated therein. I face irreparable injury that cannot be addressed or prevented in state court, only this court has jurisdiction to grant relief, under the facts of this case. The Court must consider my pleadings before dismissing my arguments, which cannot be brought in other courts as claims.

I also seek to vacate the Order because the Court erred as a matter of law by disregarding all my pled facts, pled legal arguments, ~~not limited to Defendants' conduct, and the conduct through its coconspirators, or agents De Lapp and Judge Clark, a Court of Common Pleas, in violation of federal law,~~

~~where I am a party for my exercise of federal rights, and by initiating a proceeding, under the color of the law, in violation of the Constitution and federal law, as applied against me, a party of one, under the pleadings in my complaint, and exhibits incorporated therein by reference, and in the motions, and exhibits thereto, motivated by their disdain for my religious beliefs reflected in my speech, petitions and association. Id. Judge Clark sought to intimate me with the cloak of his Court authority related to and with intent to interfere with my exercise of First amendment rights. (The Court abused discretion by disregarding the facts and legal arguments I pleaded in the complaint and motions, and by making no determination on such arguments considering the immediate irreparable injury I continue to face. D.I. 1-19). He interfered with my case, seeking to interrogate me, and demand I call him or come to his chambers. I made petitions for relief to suspend attorney license fees due to poverty. I made petitions to Master Griffin of the Chancery Court and the Supreme Court related to disparate treatment by staff based on poverty, religious beliefs, association and, or petitions. The Chancery Court through staff to misled me into almost missing my filing date to appeal Kelly Trump, and instructed me to cross off the Delaware lawyer's address in the praecipe to prevent service to local counsel. The Court abused discretion by disregarding the facts and legal arguments I pleaded, and by making no determination on such arguments. The Court made an error of apprehension. Id. Even on a Motion to dismiss the Court is required to consider "whether the allegations on the face of the complaint, taken as true, allege facts sufficient to invoke the jurisdiction of the district court." *Licata v. U.S. Postal Serv.*, 33 F.3d 259, 260 (3d Cir. 1994). The Court abused its discretion by ignoring, failing to address all the facts and pleadings in my complaint and motions before dismissing a case, related to fundamental rights requiring strict scrutiny to be upheld. Defendants face no irreparable harm. I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. I sought to make a difference differently by attempting to revise the laws over the years. I believe religion and state must be separate. People should worship or not according to the dictates of their conscience, not the dictates of the government through their partners, including religious entities. When my religious liberties were at stake,~~

I gave up public office aspirations for God, in hopes the Courts would safeguard our religious freedoms.
~~Younger does not apply.~~

I am not asking the Court to make a disciplinary determination. I am asking the Court to, *inter alia*, (1) enjoin the Disciplinary Proceedings until a determination is made, leaving time for appeals to determine whether the conduct by the defendants violated the first amendment applicable to defendants pursuant to the fourteenth amendment concerning my free exercise of religion, speech, association, and petitioning the government to address grievances, 42 USC §§ 1985(2), 1983 ("federal law"), and (2) determine whether the proceedings themselves are a violation of federal law. (D.I. 1, 2, 3, 4, 9, 10, 7, 8, 6, 12, 11, 14.) (1) The conduct by Defendants and the coconspirators as pled are a violation of federal law, and (2) the proceedings themselves are a violation of federal law. (D.I. 1-19). ~~I asked the Court for a preliminary injunction, a temporary restraining order, and waiver of bond to prevent the suppression of my right to petition to safeguard my civil rights due to destitute and inability to pay to prevent waiver of my First Amendment rights based on inability to pay. I did not ask the court to conduct a disciplinary trial. My complaint asks for additional relief, and alleged additional harm beyond injunctive relief, including but not limited to damages, physical harm, humiliation, emotional distress, harm to my life, safety, livelihood, and other relief from harm the Court did not address. Injunctive relief while the main relief, is not the only relief I requested. I would also like to include nominal relief, as the violation of my First Amendment rights are more important to protect than money or my license, though I seek to protect my license and ability to find work too. (D.I. 2, 3, 4). Uzuegbunam I did not ask the court to conduct a disciplinary trial.~~

The Court abused its discretion by ignoring the laws, facts and analysis in my pleadings and motions. The Court abused its discretion by failing to grant me relief in my motions, disregarding all facts and legal arguments. Injunctive relief while the main relief, is not the only relief I requested. ⇄
Przewski, 141 S. Ct. 792, 794. (2021). Someone talked about shooting me based on my speech reflecting my religious affiliated beliefs, albeit before the suit, a scary man took off his mask and got close to my face and yelled at me for my apparent beliefs endangering me to covid-19, and Mr. Layton

4

~~an improper motive for Defendants' case Board Case No. 115327 B per Defendants admission per the attached complaint marked as (Exhibit 1, at 7), and per my Complaint, motions and exhibits. (D.I. 1-12, 14) Defendants bring a wrongful proceeding against me because they find my religious beliefs in Jesus, "a serious concern regarding my mental capacity." Id. They allege they do not understand my beliefs in Jesus "are objectively illogical, and rely on non-legal sources, including the Bible." See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (2d Cir.) ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") My claims against Presidents Trump and Biden, and the Defendants' wrongful action against me relate to my pleadings in RFRA action Kelly v. Trump; *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Presbyterian Church in U. S. v. Mary Elisabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben Levi v. Brown*, 136 S. Ct. 930, 934. See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (Exhibit 2). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2. My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for~~

~~sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law. The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. D.I. 1-19. The Court did not examine the facts or legal arguments pled in my complaint, or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9).~~ The Constitution and Federal laws supersede state law arguments. The court ignored superseding constitutional issues, arguments and facts related to those issues, blinding its eyes guaranteeing injustice towards me, and similarly situated parties who are not below the law by poverty or pro se status, but are afforded Constitutional protections to exercise their First Amendment rights without retaliation or interference by government agents acting under the color of law seeking to suppress or punish claimants for their exercise of fundamental liberties. The cloak of color of law by Defendants, and government agents, does not give the government lawless reign, constitutional immunity to violate the Constitution, with no accountability for such violations by using the color of the law to obstruct and prevent my access to the courts. The color of the law acts as both the sword and shield per (D.I.15 and D.I. 16), rendering the Court and the arms of the Court above the law, above the Constitution, and must be overturned to prevent clear injustice.

The- Court erred by not considering or even addressing my fundamental rights and Constitutional arguments which preempt state law proceedings, and.

The Court erred by ignoring the Chancery Court's staff's and Delaware Supreme Court Chief Justice' apparent participation in the retaliation, and intentional interference to obstruct, harass, interfere, or pressure me to forgo my case, Kelly v Trump, by instigating DE-Lapp and ODC proceedings against me motivated by their disdain for my personal, religious affiliated beliefs, speech reflected the same, exercise of my right to petition, poverty, association and religious exercise, and as this case may bar me from rearguing Defendants in violations of 42 USC Sections 1983, and 1985(2), and First Amendment

violations applicable to Defendants pursuant to the Fourteenth amendment before the Delaware Supreme Court, should a negative holding against me be found. (D.I. 1-D.I 17).

The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the Supreme Court appears to have ~~partook~~partaken in federal law violations against me.

It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court ~~seeks~~may seek to sue me, and I no longer have a case before them. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3).

The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be above the law and Constitution as the courts participated in the conduct which is the cause of this action. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010).

The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer's address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.). The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the

Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.).

The Court cannot clean Defendants' hands because its owns hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me.

My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since ~~all fees were~~ paid my active attorney dues, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents.

The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, Kelly v Trump. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents. I should like to add nominal damages too.

The Defendants and Court agents by their positions are not above the Constitutional law, allowing them to suppress, obstruct and punish me for the exercise of my First amendment rights merely by the use of the color of law to discriminate and persecute me based on my faith in Jesus. I do not lose my right to seek relief in Court for Defendants' violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me. Defendants knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts should they overstep.

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Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (Exhibit 2). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my

religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2.

My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law.

The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. My complaint intentionally refers to ideas to prevent an economic crash, prevent the elimination of social security, improve healthcare and other important issues beneficial to the public. D.I. 1-19. My speech would be diminished should Defendants be permitted to label me disabled but for my religious beliefs in Jesus. The Court did not examine the facts or legal arguments pled in my complaint, or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9).

With regards to whether Younger should apply, "The pertinent inquiry is whether the state proceedings afford an adequate opportunity to raise the constitutional claims." Middlesex Ethics Comm. v. Garden State Bar Assn, 457 U.S. 423, 424 (1982). In my case there is no fair opportunity to raise constitutional claims in state court. Constitutional claims may be brought as a defense, illegality, not as a counterclaim in state court. This Court is the only venue that may afford me relief. Younger does not apply, even if it did exceptions apply. The prosecution is

brought in bad faith to persecute me based on my religious beliefs reflected in my speech and petitions, and disdain towards me due to poverty. They prosecute an innocent party, not practicing law, defending my right to worship Jesus in Kelly v Trump without government persecution, only for Defendants to persecute me. The proceeding brought under color of law, as applied is utterly unconstitutional brought in violation of my first amendment right to exercise religion motivated to punish me for my beliefs in Jesus. Defendants bring the disciplinary proceeding to harass, humiliate, demean my speech in the public's eyes and cause me emotional distress, based on disdain for my religious beliefs, speech, petitions, poverty and, or association, as an impoverished unemployed attorney, acting as a party to protect something more valuable than money, freedom to worship God. Even if the state proceeding continues, this case cannot be dismissed and I must be afforded access to the courts in the only court that may afford relief to protect something more important than my license, my ability to worship God without government persecution.

Wherefore, the Court must grant this order to prevent manifest injustice or to correct clear error. (Exhibit 5)

Dated November 2021

Respectfully submitted,

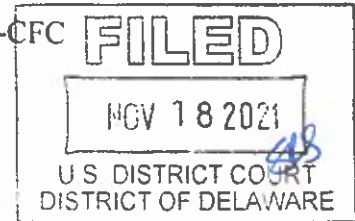
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Unrepresented indigent party,
Bar No. 4968 (Word 3,631-Count 541 Count)

APPENDIX G

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly)
Plaintiff,)
v.)
Disciplinary Counsel Patricia B.)
Swartz, et al.)
Defendants.)

No. 1:21-cv-01490-CFC



Plaintiff's Motion to Amend Exhibit G to complaint to add missing page

Plaintiff Meghan Kelly, pro se, brings this motion to amend her motion for reargument pursuant to Pursuant to FRCP 15(a)(1) to include the most important missing page to Exhibit G, the last page. Chancery Court staff Arline Simmons instructed me to cross off the address for the Delaware local counsel, in *Kelly v Trump* apparently to obstruct and prevent service to local counsel to prevent suit against former President Donald Trump because of her loyalty to the President, disdain for my desire to separate government and religion from established forced government religion, motivated by disagreements of my religious beliefs, exercise of petitions, poverty, association, and or speech or to cover up mistakes. This page shows I crossed off local counsel's address, per her instructions.

I am a paper person. I like paper copies since everything I touches appears to break lately. I did not have full scans for the exhibits, including the Exhibit title page for District Court Exhibits 8-9, but on October 25, 2021, I filed my complaint, with exhibits and motions, but the staff required electronic copies of documents.

Recall Defendants only provided me notice September 27, 2021 of threats. I had to print out 10 or more copies of everything I present to the court. So, I told the court through its staff, I do not waive the exhibits I provided and duplicated for each of the defendants and for my own records.

Due to the urgency of this case, and the continuous irreparable injury I face, I complied with the staff's request and provided them with a memory stick of what I had, because time is of the essence.

Since then, my computer broke. My computer broke the day I filed the US Supreme Court writ of certiorari, and my computer broke earlier, for a total of three times in this case.

The computer is less than two years old and is insured. This is creepy and too coincidental; that it broke on the day I filed the writ, and soon after I filed my case with this Honorable Court.

I drafted five separate proposals to impeach former President Trump on, and suspect I may be under the radar of those who do not appreciate light shed on lawless acts.

Your Honor, even the least of these is afforded protections to exercise fundamental rights without government sponsored economic, social or physical harm. I may not only be a peon before your honor, but before my family too. My Grandpop Robert Kelly was a marine. His captain sent him to Yale, not because he was smart, but I think out of pity. So, he could be an officer. All of my grandpop's mates died. He was the only one who survived World War II, thanks to the kindness of his captain.

My Grandpop went to Yale with President Bush Senior and said Mr. Bush put others down and acted better than. I believe that pride Mr. Bush reflected exhibits the image of Satan, like we all reflect when we give into temptations of our desires to harden our hearts by sin. See, D.I. 4, Exhibit A, Complaint *Kelly v Trump*. My Grandpop's brother was one of the head FBI people in Washington before he died, John Kelly.

I am distantly related to Mike Kelly of the AOL Warner Bro company, and Mark Braden, Esq, former counsel to the Republican party who coined the term "soft money," by affiliation. (See Exhibit 1)

I am also related to recently deceased Bradd McDonald who won a case before the US Supreme Court, which took over 20 years, which is injustice guaranteed, regarding sexual harassment or assaults against colleague female service members. By the time the determination was made by the courts the perpetrators may have died, or retired. Justice delayed is justice denied. Please do not deny me justice, by delay in matters of fundamental rights. (See, exhibit 2)

I know that you were appointed by President Bush, and that you studied economics. Per my pleadings, I believe people go to hell for accepting theories of economists who have what Jesus says is the evil eye, looking at money, material gain, and self-gain, instead of looking at people with love. Despite my diverse religious views, I believe you have the power to set aside personal beliefs to uphold the freedom of conscience of Americans by upholding my free exercise of conscience without government persecution, in the form of forced, trained, controlled will of Defendants and other government agents. I believe even seemingly lovely words like teamwork, "do your part," diminishes individual liberties of the mind to conform with what I believe is the mark of the beast, conditionally caring by entities without hearts, reflecting the entities they serve, churches, businesses, governments and not for profits who have no power to reflect the image of God by love. Only individuals can. I believe individuals must consciously use their mind to lay down their own wants for Gods will or they lose eternal life, should they not repent. I believe you as a judge are more powerful than the courts themselves since you have the ability to reflect the image of God by love, justice and mercy. I believe the strength and endurance of the government is the individuals within them, not money. Money is not what

keeps the government running, it is people like you who exercise their freedom in the form of free will, not forced, societal pressured will, to seek justice for all. My hope of the hero should our country collapse under the plans I provided under D.I. 3, District Court Exhibit 8, is in you and the courts. See, *The Fourth Industrial Revolution*, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version published by Portfolio Penguin, which may be found at

[https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=](https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ)

[IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ](https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ). An economic crash may be reversed and prevented by the rule of law, not by order and control, but by safeguarding freedom and guiding the misguided, not rewarding giving into temptations to harden hearts for cold hard, or electronic, cash. Please note, the past four presidents attended the economic forum meetings and are in the know or should be in the know of he planned elimination of the dollar and planned 47 percent of Americans to be unemployed by 2026-2027, including lawyers.

Pursuant to FRCP 15 (a)(1) (1) “A party may amend its pleading once as a matter of course within 21 days after serving.” On Monday October 25, 2021, I filed my complaint. This Court has not yet granted me permission to serve the defendants. Defendants are not prejudiced, and including the last page of Exhibit G which is the crossed-out address is necessary to prevent injustice. This is within 21 days.

My wealthy attorney relatives will not help me, and they are not required to. Their wealth is testimony that they sin against God per the Bible. (James 5:3, “Your gold and silver are corroded. Their corrosion will testify against you and eat your flesh like fire. You have

hoarded wealth in the last days.) . Money is not the savior; I believe justice with mercy by the courts may grant safety and relief. Matthew 23:23, Amos 5:15. I only request the courts help. There are no guarantees of justice. The Courts must protect the mere opportunity at justice through access to the courts for even the least of these, for me. See, Matthew 25:45.

I feel like a bug smooshed on the bottom of a shoe your honor. Even if you ignore my pleas for help, I pray you may someday prevent planned harm to our nation per the world economic forum's plans stemmed in self-gain at the cost of sacrificing individual liberties for control under the guise of order and aid.

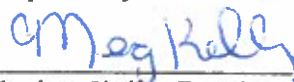
Attached please find Exhibit 3, the missing last page of Exhibit G.

Attached, please find Exhibit 4, Exhibit G with all pages, including the last page, as presented to the court in the box I provided, and as ready to present to the defendants should you grant

Wherefore I respectfully pray this Court grants my motion.

Dated November 9, 2021

Respectfully submitted,

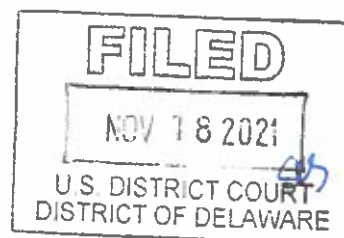


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word Count 1417)

I declare, affirm that the foregoing statement is true and correct under the
penalty of perjury, dated Nov 9, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)



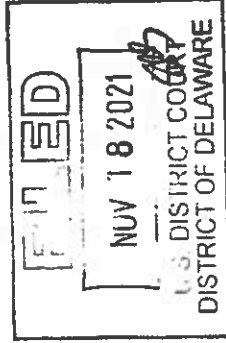
34012 Shannell
Dagoberto, DE 19937

Attn: Office of the Clerk

US District Court

844 N. King St, Unit 18

Wilmington, DE 19801-3576



INTERNATIONALLY,
DECLARATION
BE REQUIRED.



FILED

NOV 18 2021

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

U.S. POSTAGE PAID
PME 1-04V
DAGSBORO, DE
19939
NOV 18, 21
AMOUNT
\$26.60
R2305H128847-03



19801



1007

**UNITED STATES
POSTAL SERVICE®**



**PRIORITY
MAIL
EXPRESS®**

CUSTOMER USE ONLY
FROM: PLEASE PRINT

PHONE ()

Mey Kelly
34012 Shawnee Dr.
Dagsboro, DE 19939

DELIVERY OPTIONS (Customer Use Only)

1. SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the addressee is not the addressee's signature; ON 2) Purchases additional insurance; ON 3) Purchases COD (Collect on Delivery) service; ON 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

☐ No Saturday Delivery (delivered next business day)
☐ Sunday/Holiday Delivery Required (additional fee, where available)
*Rate to USPS.com® or local Post Office® for availability.

TO: PLEASE PRINT

PHONE ()

Office of the clerk
U.S. District Court, 54
N. King St. Unit 15
Wilmington, DE 19801-3710

19801-3710

For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
\$100.00 Insurance included.

PEEL FROM THIS CORNER



EJ 880 939 633 US

PAYMENT BY ACCOUNT (if applicable)

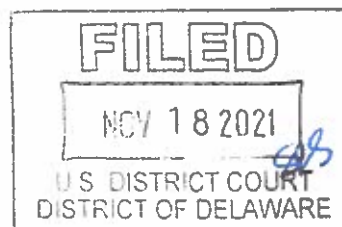
USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

ORIGIN (POSTAL SERVICE USE ONLY)

<input checked="" type="checkbox"/> 1-Day PO ZIP Code	<input type="checkbox"/> 2-Day Scheduled Delivery Date (MM/DD/YYYY)	<input type="checkbox"/> Priority Package	<input type="checkbox"/> DPO
19939	11-10-21		
Date Accepted (MM/DD/YYYY)	Scheduled Delivery Time	Insurance Fee	COD Fee
11-9-21	6:00 PM	\$	\$
Time Accepted		Return Receipt Fee	Live Annual Transportation Fee
1:05 PM		\$	\$
Special Handling/Fragile	Sunday/Holiday Premium Fee	Total Postage & Fees	
\$	\$		
Weight	Rate	Acceptance Employee Initials	
15.025		AZ	
DELIVERY (POSTAL SERVICE USE ONLY)			
Delivery Attempt (MM/DD/YYYY)	Time	Employee Signature	
Delivery Attempt (MM/DD/YYYY)	Time	Employee Signature	

LABEL 11-B, MAY 2021 PSN 7890-02-000-9996

Exhibit 1



WIKIPEDIA

Michael J. Kelly

I think he may be my dad's 2nd cousin
I think William B... worked at the same
place which is weird

Michael J. "Mike" Kelly (born 1957)^[1] is an American entrepreneur and media executive. He is the co-founder and CEO of KNV, a digital media investment and advisory firm. Prior to that, he was the president and CEO of The Weather Channel Companies, president of AOL Media Networks, and also held various executive positions at Time Warner and AOL.

Kelly is not to be confused with J. Michael Kelly, who was CFO of AOL when it was a standalone company, then CFO of AOL Time Warner after the merger, COO of the AOL division within AOL Time Warner (since renamed Time Warner), and then CEO of AOL International.^{[2][3]}

Contents

Early life and education

Career

- Time Inc. and American Town Network (1980-2002)
- Time Warner and AOL (2002-07)
- The Weather Channel (2009-12)
- Other work

Personal life

References

External links

Early life and education

Kelly was born and raised in Chicago, Illinois.^[4] His father, also named Michael J. Kelly, was a longtime advertising executive in Chicago and New York, and his great uncle was Edward Joseph Kelly, the mayor of Chicago from 1933 to 1947.^[5]

Kelly attended the University of Wisconsin–Madison and later graduated from the University of Illinois at Urbana–Champaign with a bachelor of arts in political science.^[6]

Career

Time Inc. and American Town Network (1980-2002)

Michael J. Kelly

Born	1957 (age 62–63) <div>Chicago, Illinois,<div>United States</div></div>
Nationality	American
Alma mater	University of Wisconsin <div>University of Illinois</div>
Occupation	Media executive
Years active	1980–present
Known for	<i>Entertainment Weekly</i> <div>(1996-2000)</div> <div>Founder & CEO, American Town Network</div> <div>(2000-02)</div> <div>President, AOL Media Networks</div> <div>(2004-07)</div> <div>President & CEO, The Weather Channel Co</div> <div>(2009-12) </div>
Spouse(s)	Martha Hall Kelly

Exhibit 2

104 S.Ct. 709
Supreme Court of the United States
Leroy BOYD, petitioner,
v.

John F. LEHMAN, Jr., Secretary of the Navy

No. 83-732
January 9, 1984

Synopsis

Case below, 709 F.2d 684.

Opinion

Petition for writ of certiorari to the United States Court of Appeals for the Eleventh Circuit.
Denied.

All Citations

464 U.S. 1043, 104 S.Ct. 709 (Mem), 79 L.Ed.2d 173

End of

Document

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Current Date: 9/8/2020

Source: U.S. District Court, District of Columbia (Washington DC)
Court: U.S. District Court, District of Columbia (Washington DC)
Case Title: TROUT, et al v. SECY. OF THE NAVY, et al
Case: 1:73-CV-00055
Judge: Judge Paul L. Friedman
Date Filed: 01/10/1973
Case Status: CLOSED

CASE INFORMATION

Case Number: 1:73CV00055
Jury Demand: None
Nature of Suit: Civil Rights: Employment (442)
Key Nature of Suit: Civil Rights: Employment (110.25)
Jurisdiction: U.S. Government Defendant
Cause: 42 USC 2000 Job Discrimination (Sex)

PARTICIPANT INFORMATIONExpand All

YVONNE G. TROUTToggle Section

Party Description: Individually and on behalf of others similarly situated
Type: Plaintiff
Attorney: Bradley G. McDonald
Status: LEAD ATTORNEY: ATTORNEY TO BE NOTICED
Firm Name: MCDONALD & KARL
Attorney Address: The Farragut Building
900 17th Street
Suite 1250
Washington, DC 20006-2501
Attorney Phone: 202-293-3200
Attorney Fax: 202-429-1851
Email Address: abmedonal7@aol.com
Attorney: John F. Karl, Jr.
Status: ATTORNEY TO BE NOTICED

He had a place
at Sea Colony
in Bethany

I miss talking
and visiting with
him on his
trips here where
I live.

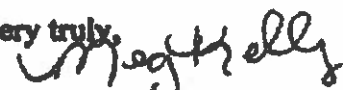
Exhibit 3

1313 N Market Street
Wilmington, DE 19801

M.K.
M.L.

Please contact me should this Honorable Court require additional
information. Thank you.

Very truly,



/s/Meghan M. Kelly
Meghan Kelly, Esquire
Pro Se
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939

Exhibit 4

APPENDIX G

MEGHAN MARIE KELLY, ESQUIRE

.....
34012 Shawnee Drive
Dagsboro, DE 19939

July 12, 2021

RE: The reason for the Withheld Subpoena to the Civil Process Clerk

Dear Honorable Justices of the Delaware Supreme Court:

I am in tears. Today July 12, 2021, I found the reason why I never got the subpoena for the civil process clerk to serve the Amended Complaint. I was booby trapped by the Court staff Arline Simmons, a self-proclaimed (former at least) Trump supporter, I thought was my friend. It was not Katrina or the Honorable Master or any Vice Chancellor.

I just saw Arline flipped my October 12 sheets, my requests for summons to the Amended Complaint. I crossed out the correct address per her guidance. I remember she directing me to do so for the amended complaint letters of instruction. Attached, please find the letters dated October 5, 2020 in a single 6 page document.

She handed over the two subpoenas, but did not hand over the one for the civil process clerk. When she provided them, she said I could not continue the action without a Delaware attorney. I remember thinking she is not giving me permission? Why else withhold the one subpoena, while handing over two.

I followed up on the missing subpoena. She requested I file additional documents after documents. I drafted document after document, full of anxiety to hurry the matter since I requested immediate expedited relief.

I did not understand why I could not get the subpoena. I had served both Trump and Barr both complaints, the Complaint and Amended complaints in the same box to each.

It would have been okay for the Master to make a determination to withhold subpoenas pursuant to her power under the statute in question, Del. Code Ann. tit. 10, § 8803(c). I was getting upset by the fact the court gave me two instead of none or all three. Why mislead me into thinking I may go forward when she intended to halt service?

Arline indicated I needed to file additional paperwork to get the civil process clerk's subpoena. I drafted paper after paper, but decided to hold off since I was intending to swiftly file a third amended complaint. I was eager and sought to expedite the case, to cure errors quickly, and thought additional paper may slow it down at that point, despite Arline's suggestion.

Arline is a self-proclaimed supporter of Trump, and believes differently than my religious beliefs. I am ardent in separation of church and state to prevent inhibiting people's free will, by cloak of government

authority, such government servant, employee or agent's shared belief inherently creates to those he or she serves.

I am in tears. Attached, please find the scans I made of all 6 pages of my letters requesting the summons. See how the civil process clerk's address is missing?

I got booby trapped by Arline when she sought to obstruct me from receiving notice so I could timely file a notice of appeal from the November 2, 2020 determination, by instructing me to cross of the address, switching the pages, and then also by telling me to file more docs.

I am in tears. I am devastated. I cannot go to the ODC since they went after me for standing up for Jesus per Judge Clark. I just discovered the reason why I did not get the subpoena now.

This is not the master's fault nor is it the Chancellor's fault. I need some time because I am so upset and heart broken.

I care about God and my case, and I care about the integrity of the court too, impartiality and justice in the courts are commanded by God too. We should not cover up evil with more evil, deceit. We should fight for truth to our own death to the end, albeit with words not weapons by shedding light on darkness to transform it, correct it to become light. See, *Ecclesiasticus 4:28*.

If possible, can you take a little more time to respond to my motion? I do not want to hurt my heart. I am devastated, shocked, and need time to regroup and heal from this painful distraction.

Thank you.

Dated: July 12, 2021

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(Word Count 720)

Exhibits to Appendix G

EFiled: Oct 12 2020 03:03PM
Transaction ID 66011956
Case No. 2020-0809-PWG



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

October 12, 2020

Via/Hand Delivery
Register in Chancery
Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
2020 OCT 12 P 2:09

RE: *Meghan Kelly v. the United States, and, the President of the United States, Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Donald Trump, in his official capacity as President of the of the United States* C.A. No. 2020-0809-PWG

President Donald J. Trump Praeceipe

Dear Honorable Clerk of Court:

Plaintiff, Meghan Kelly, has filed with this Honorable Court, on behalf of herself, Pro Se, a Second Amended Complaint against Defendant.

Plaintiff respectfully requests that the Register in Chancery, prepare a summons directing the Plaintiff to serve said summons and a copy of the Second Amended Complaint, at the following address, via registered or certified mail, pursuant to 10 Del. C. Section 3104 and Federal Rule of Civil Procedure, Rule 4(i).

**President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW,
Washington, DC 20500**

**Please contact me should this Honorable Court require additional
information. Thank you.**

Very truly,

A handwritten signature in black ink, appearing to read "Meg Kelly", written over the printed name.

/s/Meghan M. Kelly

Meghan Kelly, Esquire

Pro Se

DE Bar Number 4968

34012 Shawnee Drive

Dagsboro, DE 19939

(Word Count 199)

EFiled: Oct 12 2020 03:03PM
Transaction ID 66011956
Case No. 2020-0809-PWG



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

October 12, 2020

Via/Hand Delivery
Register in Chancery
Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

REGISTER IN CHANCERY
GEORGETOWN DE 19947
2020 OCT 12 P 2:09

*RE: Meghan Kelly v. the United States, and, the President of the
United States, Donald Trump, a.k.a. Donald J. Trump, a.k.a.
President Trump, a.k.a. President Donald Trump, in his official
capacity as President of the of the United States C.A. No. 2020-0809-
PWG
Civil process clerk Praeipce*

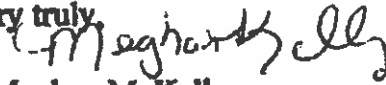
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Plaintiff respectfully requests that the Register in Chancery, prepare a
summons directing the Plaintiff to serve said summons and a copy of the
Second Amended Complaint, at the following address, via registered or
certified mail, pursuant to 10 Del. C. Section 3104 and Federal Rule of Civil
Procedure, Rule 4(i).

Civil process clerk
for the US Attorney's
Office for the District of Delaware
U.S. Attorney's Office

**Please contact me should this Honorable Court require additional
information. Thank you.**

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
Pro Se
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 199)

EFiled: Oct 12 2020 03:03PM EDT
Transaction ID 66011956
Case No. 2020-0809-PWG



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

October 12, 2020

Via/Hand Delivery
Register in Chancery
Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
2020 OCT 12 P 2:09

RE: Meghan Kelly v. the United States, and, the President of the United States, Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Donald Trump, in his official capacity as President of the of the United States C.A. No. 2020-0809-PWG

Attorney General Barr Praecipe

Dear Honorable Clerk of Court:

Plaintiff, Meghan Kelly, has filed with this Honorable Court, on behalf of herself, Pro Se, a Second Amended Complaint against Defendant.

Plaintiff respectfully requests that the Register in Chancery, prepare a summons directing the Plaintiff to serve said summons and a copy of the Second Amended Complaint, at the following address, via registered or certified mail, pursuant to 10 Del. C. Section 3104 and Federal Rule of Civil Procedure, Rule 4(i).

Attorney General
William Barr, Esquire
950 PA Ave. NW Ste 7141
Washington, DC 20530

1313 N Market Street
Wilmington, DE 19801

M.K.
M.L.K.

Please contact me should this Honorable Court require additional
information. Thank you.

Very truly,

Meghan Kelly

/s/Meghan M. Kelly

Meghan Kelly, Esquire

Pro Se

DE Bar Number 4968

34012 Shawnee Drive

Dagsboro, DE 19939

Appendix H

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly)	Civil Action No.: 1:21-1490 (CFC)
)	
Plaintiff,)	
v.)	
Disciplinary Counsel Patricia B.)	
Swartz, et.al)	
Defendants.)	

PLAINTIFF'S MOTION TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER,
DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT,
CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND
TO PREVENT MANIFEST INJUSTICE

Plaintiff, Meghan M. Kelly, pro se, this 1/11/22, pursuant to FRCP R. 52(b), and 59 (e) moves this Court to alter and amend the judgment of the Court in its December 22, 2021 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.¹

I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13th Amend., and blindly doing what they are told at a job for money to care for their family, while not caring to see clearly to love God as God, instead of money as savior and God, and not caring to see clearly to love others, by understanding how their product or service may harm others God

¹ See eg. the following for standard of review, *United States v. Fiorelli*, 337 F.3d 282, 288 (3d Cir. 2003); *Max's Seafood Cafe ex rel. Lou-Ann, Inc. v. Quinteros*, 176 F.3d 669, 677 (3d Cir. 1999); *Harsco Corp. v. Zlotnicki*, 779 F.2d 906, 909 (3d Cir. 1985).

loves.² I believe experts are rendered above the law by adherence to controlled conformity across the board which stifles improvements by freedom of thought and speech, hindered by libel laws, and defense of adherence to professional standards, delegation of duties or ignorance. I believe, fundraising, donations and government funding controls and limits what alleged experts learn, to serve lawless business greed not good, untamed by the rule of law or God's law of love. Our libel laws prevent free speech, debate and criticism to serve business greed. (D.I.4 at Ex 54 to F). Defendants allege my belief in Jesus Christ is illogical, and compel me to conform to the world, when I am commanded to be set apart, holy, or risk losing my ability to "buy and sell" by taking my license to work as an attorney.³

The trial against me is scheduled Thursday, Jan 13, 2022, days away, despite the fact I did not receive proper notice, moved to postpone the hearing, and requested an opportunity to conduct discovery to show the cause of action is illegal and to show the state does not have subject matter jurisdiction against me.

On Oct. 25, 2021, I filed a Complaint, and various motions with the District Court based on the arm's of the Delaware Supreme Court and its agents' or coconspirators interference with *Kelly v Trump* and retaliation against me for my exercise of Constitutionally protected activity under 42§§§ 1985(2), 1983, and 1988, including retaliation against me by seeking to disbar me for petitioning the Courts to remove a substantial burden upon my free exercise of religion under RFRA against the President for the establishment of government religion, established by *inter*

² See, D.I. US Ex., App E, Ex A-4, A-5, App. F, Ex. A, 1-8, 43, 46, 48, 50, 51, to App F, App H (Emphasis intended, See, *Jn. 12:40, Lk. 11:34*)

³ *Rev. 13:17, Ro. 12:2, Nu. 23:9, Heb 12:14*. Work is not the sin. When your desire for money drives out your love for God and one another, at the cost of human sacrifice, harming others to serve greed, that is sin. The Free exercise Clause permits me to worship or not according to the dictates of my conscience no matter how unreasonable my religious beliefs may be to the state, not the forced worship of business greed, money and material gain by barter or exchange.

alias executive orders that join the state and religion by partnerships through pay through barter or exchange under the deception of charity to perform government-religious business, and two petitions relating to my request for relief on attorney license dues.⁴ I sued the President to abolish executive orders that pay churches to perform government business under the guise of charity. It is business, not unconditional charitable love. This is a step to eliminate governments' function of welfare, eliminating social security and other government welfare programs, allowing lawless greed to reign by entities without hearts who have no power to do good, as individual humans may through unconditional love.⁵ These entities, will not be tamed with just laws or the law of love written on the hearts of man, should the Courts not prevent or reverse the global schemes. I read the plans the *Fourth Industrial Revolution* and the *Great Reset*. (D.I. 9 at Ex. 6, 8, 9). There is a plan through unjust policies to eliminate private property and make everything and everyone no longer free, but for sale to be rented out. *Id.* Schemes may be undone by the Courts before the courts governing power is eliminated by design through privatization and automation. The Court is my hope of a hero.

On Nov. 2, 2021, this Court entered an order without considering, analyzing or providing a legal opinion on all of the relevant facts and legal arguments pleaded to *inter alias* dismiss the Case as an improper forum to determine whether the state case against me is illegal, and dismissing all motions on November 2, 2021, reaffirming such dismissal on December 2, 2021. This court cited Defendant's 8/23/2021 letter referring to both Chancery and Delaware Supreme Court pleadings as their basis to investigate me in interference with my active case, pending

⁴ (D.I. 1-17, See especially, D.I. 4 at US Ex., Petition before the US Supreme Court, Ex. A-4 To App E, Ex. A-5 to App E, Ex 2-8 to App F., D.I. 3, with focus on District Court Ex. 11-13, 21-25, D.I. 7, Ex. 1-10).

⁵ (D.I. 2, D.I. 3, D.I. 4, at Ex A and Ex 2 of Ex F).

before the US Supreme Court at the time. (D.I. 16, D.I. 9 at Ex. 5) (Ex. A). This Court overlooked the Defendant's reference to the **Delaware Supreme Court's pleadings** as the asserted reason Defendants interfered with my active case, and retaliate against me for exercising protective activity, and evidence of the Delaware Supreme Court's participation in retaliation against me for the exercise of fundamental rights.⁶ The Delaware Supreme Court is an improper forum to determine whether the Defendants conduct against me is unlawful as a matter of law under the procedural and substantive Due process clause pursuant to the state actors and entities via the 14th Amend. and under 42 USC §§§ 1985(2), 1983, and 1988, the Equal Protections Clause for disparate treatment, and the 1st Amend. applicable to the state via the 14th Amend., and arguably 28 U.S.C.A. 605, and analyzing a full and fair opportunity to be heard by considering the analysis of (28 USCS §§ 455 (b)(1), 455(b)(5)(iv)).⁷

⁶ (emphasis intended); (D.I. 3, Ex 13 Jan 7 petition relating to attorney fees); (D.I. 4, US Ex App B, Ex A-4, A-5, Ex A of Ex. F, referring to the complaint and two motions relating to second petition relating to attorney fees, App E and F, Briefs).

⁷ See, *Davis v. Jones*, 506 F.3d 1325, 1330 (11th Cir. 2007) indicates this statute only applies to the federal courts, not state courts. The statutes analysis is useful in a procedural due process analysis regarding impartiality and a fair trial, as applied to me. The Third Circuit in *Johnson v. Carroll*, 369 F.3d 253, 259 (3d Cir. 2004) indicates, "28 U.S.C. § 455 [is for federal judges] and not on direct precedent related to the [state] trial judge's appearance of bias." This is distinguished from my case since it dealt with Section 455(a), not section 455(b)(1) and (5)(iv) as I plead. Appearance is not enough for the Third Circuit which is praise worthy because the individual justices are concerned with actual justice, under the facts, not the marketing or popularity of justice as a business).

See, *Johnson v. Carroll*, 369 F.3d 253, 259-60 (3d Cir. 2004)

"The Supreme Court held in *In re Murchison*, 349 U.S. 133, 75 S.Ct. 623, 99 L.Ed. 942 (1955), that it was unconstitutional for the same state judge, after a full hearing in open court, to punish contempt, previously committed before him while acting as a one-man "judge-grand jury" permitted under then Michigan laws. "It would be very strange if our system of law permitted a judge to act as grand jury and then try the very persons accused as a result of his investigations." 349 U.S. at 137, 75 S.Ct. 623. The Court concluded that "no man can be a judge in his own case and no man is permitted to try cases where he has an interest in the outcome." *Id.* at 136, 75 S.Ct. 623. That conclusion was based on "the basic requirement of due process" that the defendant receive "[a] fair trial in a fair tribunal." *Id.* The Court commented that although fairness certainly required "an absence of actual bias," "our system of law has always endeavored to prevent even

The District Court erred as a matter of law, in violation of the procedural and substantive Due Process Clause, the 1st Amend. and Equal Protections component of the 5th Amend. based on disparate treatment relating to religious political affiliation or pro se, in forma pauperis status, by failing to provide me with the opportunity to be heard and disregarding the clear evidence which shows the Delaware Supreme Court is an improper forum to grant damages for infliction of emotional distress, injunction or nominal damages and other relief, relating to conduct its members or agents, since the state court participated in or incited the conduct which is the subject of this dispute.

The Court also overlooked the facts indicating the Delaware Supreme Court incited or participated in the conduct in interference of and in retaliation of my exercise of Constitutionally protected conduct which is the subject of this dispute, and cannot be the judge of its own relevant conduct or participation relating to this matter, where I am not only seeking equitable relief, but I sought damages for emotional distress.⁸ I believe I developed the shingles as a result of this case on or around January 3, 2021 too.⁹

the probability of unfairness." *Id.* The Court acknowledged that its "stringent rule may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties." *Id.* However, "to perform its high function in the best way justice must satisfy the appearance of justice." *Id.* (internal quotation marks omitted).

⁸ (D.I. 2, at pages 8-9, 12-13, 48-52, 59, 68, 70, 71-74, 101,103); (Ex. B attached, Ex. B 2, attached, evidence of harassment to intentional increase emotional distress); (DI. 3 at Ex 1, 2, 3); (D.I. 20, D.I. 21 at Ex. 2, please note I was trembling at the forced violation of my religious belief that a police officer made a wellness check, per D.I. 21. Also note the pleadings relating to the physical threats to my safety based on political-religious association or speech at D.I. 1, D.I. 4, at US Ex. A-4, A-5, US petition of writ of cert, US-Ex. 52, not attached).

⁹ D.I. 2 page 103. I would also like to include nominal damages, to protect fundamental rights including the right to worship or not according to the dictates of our own conscience, not the dictates of the government. Since this right is more important than money, and is not something money can remedy. Freedom is not for sale by barter or exchange.

The entire Supreme Court may have reviewed my request to suspend active attorney license registration fees for lawyers facing economic hardship during the pandemic, and my second request for relief relating to attorney license registration fees. De-Lapp, an arm of the court, claimed their interference with my active case, was because I petitioned the Court for relief from attorney dues.¹⁰ De-Lapp, an agent of Defendants, was not going to help me. (Ex. C). I already paid the fees. They sought to gather evidence against me, to punish me for my exercise of fundamental rights, including the right to petition the court regarding attorney dues. It appears the Delaware Supreme Court justices or agents incited the arms to attack me by providing the information to DE-Lapp. I made a request for Chief Justice Collins J. Seitz, Jr. to recuse himself. *Id.* So, he did not participate in *Kelly v Trump*. Three Delaware Supreme Court Justices participated in the matter which is a source of Defendants' unlawfully motivated petition against me, Justices, Vaughn, Traynor and Montgomery-Reeves. (D.I. App A, App B); (Ex. D).

Pursuant to Federal Rules of Evidence Rule 605, "The presiding judge may not testify as a witness at the trial." I am not afforded the opportunity to ask the Delaware Supreme Court in the Board's venue or in the Delaware Supreme Court's venue to ascertain the Court's incitement and participation in the action by the Defendants. Neither is the ODC. I am not afforded a fair and impartial trial to determine the legality of the proceeding, for nominal damages, damages for emotional distress, injunctive or other additional equitable relief. The state forum does not afford a venue for the relief I seek. (Ex. E, Notice to the Supreme Courts of my objections of state court jurisdiction). Only the federal courts may afford me a fair, not fixed, opportunity to be heard. There is no guarantee of justice. Yet, injustice is guaranteed if the doors to the only fair,

¹⁰ (D.I. 9 at Ex 1, De-Lapp's letter); (D.I. 3, Ex 13 first petition relating to attorney license fees); (D.I. 4, US, Ex A-4, A-5, relating to second petition relating to license fees).

impartial forum, that may afford me, a party, with relief is closed due to pro se, in forma pauperis status, partiality to the state which is not permitted, or based on malicious motives such as religious political beliefs.

The members of the Delaware Supreme Court are material witnesses to the facts relating to my case and the petition against me. Pursuant to 28 USCS § 455 (b)(1) (5)(iv), "(b) [Judges] shall also disqualify [themselves] in the [if to] the judge's knowledge [he or she is] likely to be a material witness in the proceeding." Pursuant to 28 USCS § 455 (b)(1) A judge shall disqualify himself, "(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding." The Delaware Supreme Court members have "personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding" in the illegal as applied proceeding in state court. Id.

The facts related to the ODC's petition arose in the Chancery and the Delaware Supreme Courts ("Courts"), and create the appearance of the Courts' "personal bias or prejudice concerning a party [me, and]" personal knowledge of disputed evidentiary facts concerning the proceeding." Id. The Courts through its members or staff appeared to have instigated or participated in the retaliation or/and in interference with the exercise of my access to the courts, based on discriminating against me for my religious associated beliefs reflecting in my petitions and speech. Accordingly, the Courts must recuse themselves, pursuant to 28 USCS § 455, (a), § 455 (b)(1), and § 455 (b)(5)(iv.), and the Procedural and substantive Due process Clause.

The law library also was granted PACER access by the Delaware Supreme Court which is suspicious, evidence the Delaware Supreme Court is preparing a case against me. Justice Traynor also came into the law library looking for federal jury instructions, I believe to prepare

someone to sue me in federal court, which if it is true, makes a fair trial impossible in the Delaware Supreme Court. The state Court and the Board are without jurisdiction to hear my grievances for this unlawfully brought petition.

The Court erred as a matter of law, and creates manifest injustice by denying me a full and fair opportunity to be heard in violation of the Substantive and Procedural Due Process clause applicable to me, based on disparate treatment against me motivated by religious-political belief, *pro se informa pauperis* status, or overlooking the evidence, in clear error of the facts and clear error of legal arguments, blinded by partiality towards the state as opposed to the parties as equal under the law.

Since October 25, 2021, new and additional facts have arisen which must be considered by the Court to correct clear error of facts, to correct clear error of law and to prevent manifest injustice preventing me a full and fair opportunity make my case and litigate the issues.

On or about November 3, 2020, the Preliminary Review Committee met and determined a petition may be brought by Defendants against my person relating to my case *Kelly v Trump*.¹¹ Defendant indicated her desire to appoint counsel. I objected on religious and economic grounds. Despite my objection she requested appointed counsel with the Delaware Supreme Court. I filed a letter indicating I would object to appointed counsel, and another letter providing notice that I will object to the Supreme Court's subject matter jurisdiction. (Ex. E, F). On Fri., Dec. 10, 2021, the Board signed a notice of a hearing. I was not provided proper notice on Dec. 10, 2021. On Mon., Dec. 13, 2021, the Delaware Supreme Court appointed counsel despite having notice of my objection to counsel which caused me great emotional distress. On Thur., Dec. 16, 2021, I

¹¹ The Preliminary Investigative Committee can be removed from my complaint, as the injunctive relief sought is now moot. Additionally, should defendants David White and Kathleen Vavala abstain from involvement I will stipulate to their removal from the complaint, but I do not waive my one free Amendment of complaint before service to Defendants on this.

received a letter regarding the appointment. On Fri., Dec. 17, 2021, counsel contacted me. I immediately indicated my objection to his appointment. On Sat., Dec. 18, 2021, I filed the attached letter with the Board objecting to improper service, requiring a postponement on the hearing so I may be afforded discovery, and a decision on counsel, and notice that I intended to file a motion with the Delaware Supreme Court on Monday. (Ex. G). On Mon., Dec. 20, 2021, I filed *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021*, with the Delaware Supreme Court, with a copy to Defendant, and the Board, albeit the Board's copy was mailed Dec. 21, 2021. (Ex. H). On Dec. 21, 2021, I filed the attached letter with the Court rejecting appointment of counsel. (Ex. I). Appointed Counsel moved to terminate his appointment on Dec. 23, 2021. On Dec. 29, 2021, I filed a letter motion with the Court to inter alias object to counsel on 6th Amend. Grounds and postpone the hearing in the interest of justice. (Ex. J). The Court excused counsel.

Defendant and the Court knew appointment of counsel violated my religious beliefs. Defendants failed to provide proper notice of a hearing, and did not respond to my request for an extension of time.

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

I have not received a response. The scheduled hearing is in less than 4 days. I did not receive proper notice, and have not received a response regarding discovery or postponement of the hearing. This is not a fair proceeding. This is punishment to bend my will to conform to the state's worship of business greed at the cost of selling my soul to hell, a cost too great. My faith

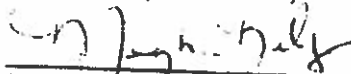
in Jesus teaches me not to be conformed to the world. The Constitution allows me to hold religious beliefs different from the state. The Constitution protects me from government retaliation for my beliefs, speech, association and petitions relating to my religious beliefs.

This Court must deny me an opportunity to be heard and a fair trial. No one is above the law. No one is below the Law. The constitution is under attack, and the United States needs you to uphold the limits on government that make us free, above procedural and statutes, or our union may dissolve. The world is on your shoulders, not in your hands to mold, but requiring you bear the burden of reading my religious thoughts and petitions, even if you disagree and do not understand my faith in Jesus Christ. You are free to believe differently than I, but you are required to uphold the constitution to protect those with diverse beliefs from mob lawless reign of lusts, with the rule of law. No one is below the law, even a peon like me. You strengthen our faith in equal access to the courts without disparate treatment in violation of the Equal protections component of the 5th amend. by opening the doors of the court to all people, regardless of poverty, religion, race, place of origin or association. You prevent people from taking justice in their own hands through misbehaving might makes right thinking, when might makes wrong. Please hear me your honor. It is the opportunity at justice, not guarantee I seek.

WHEREFORE, I respectfully request you amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice.

1/10/22

Respectfully submitted,



Meghan Kelly, Esquire

DE Bar Number 4968

34012 Shawnee Drive

Dagsboro, DE 19939

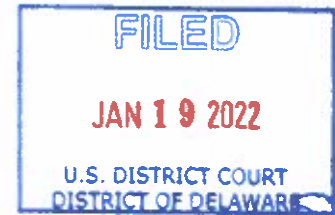
meghankellyesq@yahoo.com, (3,728 Words)

Appendix I

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly)
)
Plaintiff,)
v.)
Disciplinary Counsel Patricia B.)
Swartz, et.al)
Defendants.)

Civil Action No.: 1:21-1490 (CFC)



PLAINTIFF'S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE

Plaintiff, Meghan M. Kelly, pro se, this 1/18/22, pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) moves this Court to alter and amend the judgment of the Court in its 12/22/21 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.

1. I also am providing notice that I will likely, to my chagrin, amend my complaint to include the Delaware Supreme Court as a Defendant and individual judges for nominal and equitable relief.¹ The Supreme Court incited, participated or caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms' interference in my lawsuit *Kelly v Trump* on violation of 42 USC Section 1985(2). Whether the Delaware Supreme Court's report to DE-Lapp was out of concern for poverty or a malicious purpose is in issue. A complaint was made apparently by the Supreme Court or its agent based on my petition for relief from attorney

¹ I respectfully request to include nominal damages should the Court allow amendments to the complaint. See, *Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, *49-50. Also see, *Molina v. Pa. Soc. Serv. Union*, 2019 U.S. Dist. LEXIS 120040, *27, 2019 WL 3240170.

dues to the arm's of the Court. (Ex. 1st A). De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission. (D.I. 3, District Court Exhibit 13, D.I. 9, Exhibits 1, 2, 3). The Delaware Supreme Court did not grant my petition, and ignored my second petition, deeming me unworthy of the opportunity to be heard on relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amend. as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights. This Court overlooked the Delaware Supreme Court's apparent incitement of the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights. I desire to protect the Courts, to protect those I seek to correct in this case. I am sad your honor did not enjoin the state proceeding to date, forcing me to add the Delaware Supreme Court and its members. My hope of a hero to preserve our union and to make it more just and freer is with the Courts.

2. I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). ((Ex. A), Email to Defendants regarding my religious beliefs since my religious beliefs are in question), also see (Ex. C, Ex D, Ex. Ex. E, internal Ex. F, H, I).

3. I am making this Motion in addition to, not in amendment of or in replacement to the previous motion (also referred to "M1"), I made seeking similar relief, albeit with additional facts which must be included to prevent clear error of fact, of the law and to prevent manifest injustice. Since, I filed that motion served to the Court and Defendant via US Mail on 1/10/21,

new and additional facts arose which must be considered by this court to prevent manifest injustice.

4. Defendant Board failed to allow me to be heard on two outstanding motions, in contravention to the Procedural and Substantive Due Process requirements under the 14th Amend., and based on disparate treatment in violation of the Equal Protections grounds motivated by disdain for my religious-associated beliefs or poverty, demeaning me as unworthy of being heard, one served 12/18/21 via US Mail, requesting suspension of the hearing due 1. to ineffective service, and, 2. Requesting a suspension of hearing date until, a final determination is made on counsel, and 3. Until discovery is complete, to allow time and opportunity for me to prepare a defense, and the second outstanding motion served via US mail on 12/31/21, with courtesy copy emailed to the Board and Patricia Swartz regarding *Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs.* (Ex. B, Ex C).

5. On 12/29/21, I also served a letter with exhibits with both the Delaware Supreme Court and Defendant Board notifying them,

"The hearing is two weeks away, no determination has been made by the Court on my exercise of self-representation under the 6th amendment, and on religious grounds, and on my request to postpone the hearing so I may perform discovery to adequately defend my exercise of Constitutionally protected activity which is the subject of this petition, per the state's admission. (Emphasis Intended), (Citing M1 at Ex J page 1, and at internal-Ex A part 2 and Petition at 7).

6. On the afternoon of 12/30/21, two weeks prior to the original hearing date, the State Court granted me permission to represent myself, after fighting for the right to do so since I discovered counsel was appointed. (emphasis intended).

7. I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

8. I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on 1/10/22. The Board indicated the hearing was on schedule for 1/13/22. (Ex D at internal Ex. B).

9. On 1/11/22, I filed *Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against me to prevent manifest injustice to afford me an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against me for my exercise of fundamental rights, motivated by the state's disdain for my religious political beliefs, dated 1/11/22.* (Ex D incorporated in total)

10. I motioned both the Delaware Supreme Court and the Board, simultaneously, on 1/11/22 since the trial against me was scheduled 1/13/22, days away, despite the fact I did not receive proper notice of the hearing, moved to postpone the hearing, requested updates on receipt which were not timely addressed by the Board, and requested an opportunity to conduct discovery to show the cause of action is illegal and to show the state does not have subject matter jurisdiction against me. (Exhibit E incorporated in total with objections and additional Constitutional arguments).

11. On 1/11/22, the Delaware Supreme Court swiftly granted an order denying relief based on jurisdiction. (Ex. E Internal-Ex. B).

12. While I was grateful for the swift determination of this Court, I am concerned by the Court's footnote 2, noting "Procedures and hearings for proceedings to determine incapacity are conducted in the same manner as disciplinary proceedings." *Id.* By the Court's reference to a different proceeding conducted in the same manner as this disciplinary proceeding, it appears my life and liberty are at stake in this case. *Id.* I am scared the court, the Delaware Supreme Court, may seek to put me away for my religious beliefs in a separate proceeding noted in the order.

13. My belief in Jesus is not a mental disability, nor is my poverty. Caring for God and caring for others as myself is not a disability. I must not be punished for the exercise Constitutional rights merely because the State does not agree or understand my religious thinking and religious beliefs.

14. On 1/11/22, the Board granted an order postponing the hearing for eight days **due to alleged illness**, a reason not included in my motion. (emphasis intended) 6(Ex. E Internal-Ex. B). The Board was aware I was not feeling well when I immediately notified them, I was not feeling well, a week earlier. (Ex. E, internal Ex J, and Ex F).

15. Illness was not a reason I included in my motion. I informed the Defendants I was not feeling well to look after the health and lives of my opponents, and my own life, with love, during a global pandemic, where millions are dying. (Ex E)

16. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion. (Ex. E. at Internal Exhibits G, H, I, L, M), (Ex F).

17. The board was aware of obstacles I was facing, and the stress Defendants caused me by their desire to rush a proceeding, which required I act swiftly to object to running on empty or waive fundamental rights. (Ex. E, G)

18. Despite having knowledge, I have been under the weather, needed time to research, perform discovery, and prepare a defense, including the defense of lack of subject matter jurisdiction, and illegality of proceeding, as applied, was not heard on outstanding motions, including a motion served on 12/18/22 via mail to postpone the hearing for opportunity to perform discovery and to file motions, and a motion relation to my religious objections against being observed or examined by a health or mental health professional served via US mail, courtesy copy to the Board and ODC via E-mail on 12/31/22 , and desired to file additional motions, including a motion to dismiss based on lack of subject matter after collecting evidence for clarity, the Board denied rendering an order on my 12/18/21 motion to postpone the hearing. Instead, the Board did not respond to previous week's status update requests, or the Dec. 2021 status of receipt and update requests. The Defendants ignored, and did not afford me an opportunity to be heard on past motions in violation of the substantive and procedural due process clause, and possibly in violation of the equal protections clause as applied to me, by treating me disparately based on religious beliefs, in contravention to the norms of a fair proceeding. (Ex. E, Ex. L)

19. On 1/12/22, I appealed the Board's Order by filing *Respondent Meghan M. Kelly's Motion Appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research, file motions, be heard on*

outstanding motion(s) unaddressed by the Board, to defend her exercise of fundamental rights and to preserve her license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense, dated January 12, 2021. (Ex. E incorporated herein in total).

20. On 1/13/22, I filed a motion for the state Court to make an immediate emergency determination on my motion to appeal. (Ex. G, internal Ex. F)

21. On 1/14/22, Defendant attempted to provide a response to the December 18, 2022 Motion served December 21, 2022 beyond 20 days allowed, when the issue was already determined by the Board by the 1/11/22 order, to harass me and distract me from preparation when I already indicated to the Board and Court, I do not have enough time to research or prepare a defense.

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

23. So, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment, motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed

lusts. I am not sitting on this, but am acting in haste to protect and assert my Constitutional rights to prevent waiver.

24. On 1/15/22, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto, and incorporated herein in total, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

25. There are only 3 business days before the rescheduled hearing. I informed Defendants I am not ready, and need time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The Defendants fail to grant me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is no legitimate or important reason for Defendants to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an

unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amend.

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

27. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010). Defendants act above the law, and declare me below the law, by denial of Constitutional protections, motivated by disdain for my religious beliefs and poverty.

28. I will suffer continued irreparable harm if I am unable to gather testimony and facts to provide a defense of dismissal of the petition, based on subject matter and illegality of proceeding, as applied, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. "The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Mullin v. Sussex Cnty., Delaware*, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

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

Defendants have not met the burden of strict scrutiny to infringe upon my exercise and assertion of Constitutional rights.

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

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

32. The government runs on individual free choice, the collective free choice of the many who agree to respect the Constitutional laws' protections of all people regardless of race, religion, poverty, gender, age or place of association. When individuals within government no longer respect the Constitutional laws that make us free by limiting their government power, we are no longer a free people, but a for sale enslaved people in violation of the 13th Amend.

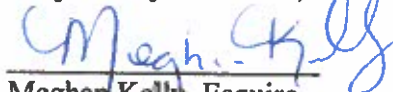
34. The Free exercise of speech, association, right to petition, and religious exercise, and freedom of conscience have not been sold, making it not a freedom, but a bargaining chip to exchange by relinquishment to serve business greed.

35. I have not sold soul to hell in exchange with the license to practice law.

WHEREFORE, this court must amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice.

1/18/22

Respectfully submitted,



Meghan Kelly, Esquire

DE Bar Number 4968

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com, (3,177 Words)

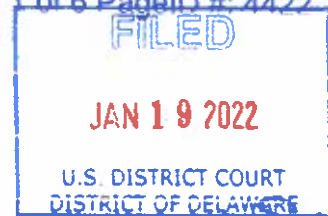


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EXHIBIT 1ST A, Letter of investigation by arm of state court, dated May 24, 2021

EXHIBIT A, E-mail to Defendant regarding my religious beliefs, and world economic forum founder's plan as outlined in the two books The Fourth Industrial Revolution "to entice people through temptations to make 47 percent of Americans unemployed, to use the unemployed by labeling them mentally disabled, for mad science to teach the lie the mind can be controlled through robotics and medicine."

EXHIBIT B Letter Motion, Dated December 18, 2021 to Board, DE Supreme Court and Defendant regarding discovery, reconsideration of counsel, and postponement of hearing due 1. to ineffective service, until after a final determination is made on counsel, and 3. Until discovery is complete, and the Receipt and postal confirmation Board and ODC received the December 18, 2022 filing on December 21, 2022

EXHIBIT C Respondent's Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs, and

Memorandum of Law in Support and Respondent's Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs

EXHIBIT D Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs, dated January 11, 2022,

Exhibit A excluded since it is a District Court Doc.

Exhibit B includes internal exhibits, in one saved document

1. Email to Board and Patricia Swartz, dated Thursday, January 6, 2022, following up on motion to postpone the hearing one week from the date, to afford a full and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and procedural due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

2. Email to the Board and Patricia, dated Monday, January 10, 2022, follow up on status of my request to postpone the hearing.

3. Email to the Board and Patricia, dated Friday, December 24, 2021, regarding following up on my request to postpone the hearing, and the outstanding issues relating to appointed counsel verses permission to represent myself, undecided by the Court. Notice of my intention to file a Motion objecting to an expert's attendance at the hearing as against my religious beliefs, and notice of my intent to file a protective order to protect myself from examinations from mental health and physical health experts on religious grounds.

4. Email notification the Board member is out until December 28, 2021, dated December 24, 2021.

5. Email from the Board dated January 10, 2022, indicating the Board plans to move forward with the virtual hearing as scheduled, despite my appeal based on improper notice, and the need to prepare to defend my case.

6. Email to the DE Supreme Court, Board and Patricia, dated January 6, 2022, regarding the federal government is helping me with the vulture attacks.

7. Accidental duplicate of Dec 24, 2021 email, at No. 3.

8. Email to Court, dated December 22, 2021, forwarded emails to appointed counsel, firing him, and copying to others to protect my safety, dated December 21 and 22, 2021.

9. Email to Court asking for the Board's number, December 22, 2021. I was only able to leave messages.

EXHIBIT E Respondent Meghan M. Kelly's **motion appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware** dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in my motion to grant postponement to afford me opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and a hearing date must be postponed until after a fair opportunity to build a defense is granted, and moves the court to suspend a hearing date until the parties and the Board determine a fair opportunity to perform discovery has been allowed so as not to violate the norms of a fair proceeding, displaying disparate treatment towards respondent based on her unique religious political beliefs, in violation of the Equal Protections clause applicable to her as a party of one, **dated January 12, 2022.**

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

Exhibit B The Delaware Supreme Court Order Denying my emergency objections and motion to postpone the hearing.

Exhibit C The Board Order granting a postponement of the hearing to the date January 21, 2021, "due to illness," a reason I did not request.

Exhibit D Email to Patricia Swartz, dated January 3, 2022, regarding I am not feeling well, took a covid tests, amd negative, but believe I am developing the shingles.

Exhibit E Email to Board, Lisa at the Supreme Court and Patricia Swartz regarding still sick, problems with phone, and vulture issue at home, which may interfere with scheduling, also attached pictures of the vultures

that chase me and peck at the glass windows, and do not go away when I yell at them.

Exhibit F Email from the Board dated January 10, 2022, responding to my most recent request on my motion to postpone the hearing indicating “The Board plans to move forward with the hearing as scheduled

Exhibit G Email To the Board and Patricia, dated December 24, 2021, regarding

1. I received docket ending before December 21, 2021,
2. Told the Board I would send them my November 19, 2021 answers to the petition via email for ease,
3. Indicated the Board is aware of my request to postpone a hearing date so I may properly defend my exercise of Constitutionally protected activity from state retaliation, but for the exercise of fundamental rights, requiring the government to bear the burden of strict scrutiny.
4. I told the Defendants I intend to file a motion objecting to an expert's attendance at a hearing, as it is against my religious beliefs. I am a child of God, not a scientific object for observation and examination by health or mental health examiners who play God by seeking to mold people like me to scientifically conditioned and conformed dictates instead of protecting the individual's dictates of conscience. Experts deem those whose will does not bend with temptations to adhere to the communally accepted trendy molds as unfit. My God teaches me those who are conformed to the world do not have eternal life and will be unfit for heaven, should they not repent.
5. I also told the Defendants I will likely file a protective order to protect myself from examination from mental health or physical health experts on religious grounds, should petitioner seek an examination. My exercise of fundamental rights, including exercise of my religious beliefs, requires the state meet strict scrutiny, which it is not likely to meet.

Exhibit H Emails dated January 11, 2022, email from Patricia Swartz to Board and me, objecting to postponing the hearing, and my responses, including my right to believe differently than the majority, and my religious objections to healthcare.

Exhibit I Email January 11, 2022, my email responding to opposing counsel, providing religious objections to healthcare and my religious beliefs, my disagreement with many democrats on healthcare when I ran for office in 2018, and a sign healthcare that cares not healthcareless, your health is your wealth, as I was still under the weather.

Exhibit J January 4, 2022 email to Court, Board and Defendant regarding I wasn't feeling well. The covid test was negative, but looks like I developed shingles.

Exhibit K Email, dated January 5, 2022, relating to a broken phone through the federal government

Exhibit L Email dated December 31, 2022, to the Board of motion, *Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs; Memorandum of law in support of this motion, certificate of service, postal receipt, table of contents of the exhibits, and exhibits thereto contained, dated December 31, 2021*

Exhibit M Emails January 12, 2022, regarding I was not making a new motion merely because I communicated with the Board and Defendant I desired time to afford a fair opportunity to prepare a defense.

Exhibit F Answer to petition, excluding exhibits.

Exhibit G *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of*

jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.

(Internal Exhibits) Exhibit A Post Office Receipt, and certified mail receipt and confirmation the December 18, 2021 letter motion requesting opportunity to perform discovery and file motions to dismiss was received by the Board and ODC on December 21, 2021

Exhibit B Postal Receipt for December 29, 2021 letter to Court, Board and ODC, dated December 29, 2021

Exhibit C Emails to and from Patricia regarding moot motion

Exhibit D January 12, 2022 email correction to Motion filed January 12, 2022, the federal government is helping me with the vultures, forwarded email from the Federal government representative.

Exhibit E Email to and from federal government official relating to the fact there is no charge for federal assistance with elimination of vulture problem, so as not to violate my religious beliefs.

Exhibit F Email filing dated Thursday, January 13, 2022, motion to expedite motion to appeal with the Delaware Supreme Court.

Exhibit 1st A

After Judge
Clark's Interrogation

Lawyers Assistance Program

Carol P. Waldhauser, Executive Director
The Renaissance Centre
405 N. King Street, Suite 100 B
Wilmington, Delaware 19801
www.de-lap.org

Private: (302) 777-0124
Toll Free: 877-243-3527
Fax: (302) 658-5212
cwaldhauser@de-lap.org

MAY 24, 2021

CONFIDENTIAL

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

Dear Meghan:

We understand that you may be experiencing some financial difficulties with regard to license fees, etc. As a member of the Delaware Bar we care about you. For that reason, we are reaching out, confidentially, to see if we might be able to offer assistance to you.

The Delaware Lawyers Assistance Program, The SOLACE Committee, The Delaware Lawyers Assistance Fund and the Professional Guidance Committee all provide support to attorneys who may need resources for basic needs, as well as referral options as needed or required. Again, these services are free and confidential.

To better understand, how we can assist, we want to meet with you - either virtually - or in person. Do you have WIFI available where we might meet virtually? Or in the alternative, are you able to come in Georgetown to meet? Once again, this is confidential, and we would like to be able to explore our resources and determine if our services can help you.

So please, reach out to us either by e-mail or phone. Our information is: Carol cwaldhauser@de-lap.org and/or Eleanor can be reached at emkiesel@aol.com, or call Carol at DE-LAP 302-777-0124. We hope that you can connect with us and see if our resources and/or referrals can assist you. Remember, DE-LAP is a Confidential, Free, Non-Judgmental Service Just for Delaware Lawyers and Judges. Equally important, we do together what need not be done alone!

Very truly yours,


Eleanor M. Kiesel, Esquire, PhD, Lawyers Assistance Committee


Carol Waldhauser, Executive Director, Lawyers Assistance Program (DE-LAP)

Electronically forwarded with encls: meghankellyesq@yahoo.com

SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org)

To: meghankellyesq@yahoo.com

Cc: emkiesel@aol.com

Date: Monday, May 24, 2021, 11:58 AM EDT

Meghan:

Please find attached a self-explanatory letter.

Please contact us within the next 10 days regarding it.

Thank you.

Carol

Carol P. Waldhauser, Executive Director

The Delaware Lawyers Assistance Program

(DE-LAP)

405 N. King Street, Suite 100B

Wilmington, DE 19801

(302) 777-0124

Cell: (410) 409-8874

cwaldhauser@de-lap.org

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FREE, CONFIDENTIAL AND NON-JUDGMENTAL, DE-LAP has assisted the Delaware Bar with quality of life and quality of professionalism issues. We Do Together What Need Not Be Done Alone!

Threat 10
days

Exhibit A

47 percent of Americans unemployed by design BD 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov

Cc: lisa.dolph@delaware.gov; karlis.johnson@delaware.gov

Date: Wednesday, January 5, 2022, 12:58 PM EST

Hi Patricia,

I believe people go to hell for fundraising and organized charity should they not repent of such wickedness. Jesus teaches it is not true charity in Matthew 6:1-4. I think donations to colleges with strings attached has misguided research and controlled what is expertise. Science is driven by the love of money to control people, driving out love for one another, instead of freely (not for sale forced) encouraged by the love of the truth, and the pursuit to find it to care for, not control, humanity.

I did not realize how bad the world was until I ran for office. The democrats hated my proposed plans to improve healthcare to care for people, instead of exploiting their need to serve greed, not good, with more bad care. It was if they knew a pandemic was planned. See my complaint against the democrats.

Our libel laws protect serving what I believe is the beast spoken of in Revelation, business greed, at the cost of killing, stealing and destroying people. Human sacrifice for material gain is against my religious beliefs. Money through grants and donations encourages bad business, by rewarding bad care. Protecting the free exchange of ideas, including finding flaws and criticism in business proposals, would improve care. The libel laws inhibit improvements, stifling the free flow of ideas and speech. The donations and government grants to schools buy control of a no longer free market, but a forced, compelled market in violation of the 13th Amendment.

My religious beliefs that money is not God, money is not what controls me, do not align with what the world teaches. My religious belief in love for humanity and for God pose no danger but offer protection towards humanity by entities who would sacrifice their life and liberty to serve greed, not good.

Individuals are what hold the government together, not money. The love of money and material gain may destroy our government if it's not tempered with the rule of just laws to care for humanity.

There is a plan to entice people through temptations to make 47 percent of Americans unemployed, to use the unemployed by labeling them mentally disabled, for mad science to teach the lie the mind can be controlled through robotics and medicine. Please see the book I provided to you *The Fourth Industrial Revolution*. Look at the last few pages. My God teaches me, we have free will, not a controlled will through medicine and robotics. We have a choice, no matter the temptations to sin, the pressures to violate our faith, even the choice of death in order not to violate our religious beliefs in God's will.

There is a plan to harm humanity to control humanity by eliminating the governments' power to govern, and the eventual elimination of our government.

The Courts are my hope of a hero to stop the lawlessness in the other two branches of government, to prevent the wicked schemes by those who entice our government officials to give into temptations. The government must govern and guide, not collude or market businesses and be controlled by business greed, allowing entities to be above the law, to the ultimate destruction of the law down the line as government private partners take over the governing function of governments by the lawless reign of its desires without restraint in the form of just laws.

The world is in trouble. The courts can only save us by preventing or reversing the manufactured crash of the dollar, and the "Great Reset," if someone with standing to sue either of the two other branches, asks them. I am hoping an Attorney General may have the courage to do so.

I know I may get into trouble for asking you to care to love humanity above money to do a job. Despite that I have hope that maybe one of you three someday will choose to reflect the image of God, by unconditional love, to be a hero by preventing great harm. We are not stuck should individually judges behave as more than machines, but as humans capable of reflecting the image of God by love. We have free will no matter if others lie by saying there is no choice.

There is always a choice to do the right thing, right now, to exercise our freedom of conscience to love humanity instead of merely going through the motions of a job for the love of money. We need a hero. I hope an individual judge will choose to save humanity.

I hope you have a good day.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr

Dagsboro, DE 19939

meghankellyesq@yahoo.com

4968

Exhibit B

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Administrative assistant to the Board on Professional Responsibility

405 N. King Street, Suite 505

Wilmington, DE 19801

**RE: Entitled to Discovery/Reconsideration on counsel/postpone hearing until
counsel determination and discovery is complete including appeals/ ODC Board
Case No. 115327-B (Meghan M. Kelly, Esquire)**

December 18, 2021

Dear Board members:

**On Thursday, December 16, 2021, I received the Delaware Supreme Court's
order, dated December 13, 2021, regarding the appointment of counsel, despite
notice of my intent to object, attached hereto. On Friday afternoon, December 17,
2021, David Hutt, Esquire emailed me the notice of hearing you sent dated
December 10, 2021.**

**Please be advised, service was ineffective. I did not receive this through the
mail. I object to the ineffective service to me, and to the appointment of counsel.**

**I intend to file a motion for reconsideration with the Delaware Supreme
Court on Monday December 20, 2021.**

**I am entitled to discovery, and would like time to draft interrogatories and
perform other discovery before a hearing is conducted.**

I respectfully request we post pone scheduling hearing until:

1. a final determination is made on my opposition to counsel, and
2. Until discovery is completed.

Please be advised, I immediately told David Hutt, Esquire of my intention to the appointment of counsel per the attached.

Thank you for your kind consideration.

Very truly,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
(Word Count 270)

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

Dated: December 18, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

EXHIBIT 1

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of the Supreme Court

55 The Green

Dover, DE 19901

RE: ODC Board Case No. 115327-B (Meghan M. Kelly, Esquire)

November 22, 2021

Dear Clerk:

I intend to object to the ODC's attached request for appointment of counsel with regards to the above referenced matter for me on religious grounds, and object to potential costs too. Albeit the letter noted the appointment of an attorney would be "without cost."

Thank you.

Very truly,

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

No Phone

meghankellyesq@yahoo.com

Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

Appendix J

U.S. DISTRICT COURT, DISTRICT OF DELAWARE

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

2022 JAN 19 AM 1:01
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

**PLAINTIFF MEGHAN M. KELLY'S 3rd EMERGENCY MOTION
PURSUANT TO FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65**

AND NOW this 1/19/22, respondent, Meghan M. Kelly, pro se, files emergency motion to pursuant to FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6) and 65 moves this Court to alter and amend the judgment of the Court in its 12/22/21 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.

1. Since yesterday, January 18, 2022, after I served a second emergency motion pursuant to pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) additional facts must be presented and considered by the court to prevent manifest injustice, and to allow for relief this court Plaintiff already requested pursuant to FRCP R. 65 in her motions for a preliminary injunction and temporary restraining order. (D.I. 6, 7, 8, 9, 10, 11, 33) (Ex. A, Return receipt of January 18, 2022 motion served to the court).

2. The Defendant Board rendered a decision, attached hereto, denying me of the right to subpoena witnesses, cross examine witnesses, and present evidence, by denying her ability to collect the same, in defense of my exercise of fundamental rights without state interference and punishment by bringing the petition against me, but for my religious beliefs and exercise of fundamental rights including the freedom of conscience to think, believe, exercise religious beliefs, speak based on her beliefs, petition the courts, and associate. (Ex B, informal decision along with critical emails)

3. The State has brought a petition against me for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13th Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly** to love God as God, instead of money as savior and God, and not caring to **see clearly** to love others, by understanding how their product or service may harm others God loves.¹

4. On December 13, 2017, the Delaware Supreme Court appointed counsel despite having notice of my objection.

¹ (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

5. I experienced emotional distress relating to this government compelled violation of my religious belief and filed a number of papers before the Delaware Supreme Court granted me permission to represent myself on December 30, 2021.

6. Prior to that date, I filed a motion for time to prepare a defense, research and perform discovery to determine which witnesses to call.

7. I followed up numerous times with the Board on the status of my motion, but it was not until January 10, 2022, that an indirect determination was made. The Board ignored my motion, escaping an appealable order to deprive me of an opportunity to be heard in violation of the substantive and procedural due process clause, arguably basing their disparate treatment towards me, by partiality towards the state, demeaning my religious beliefs, religious exercise and exercise of the right to petition, and associate and speak, as unworthy of protection in violation of the Equal Protections Clause, and the Due process and substantive due process clause of the 14th Amend. (Ex B).

8. On January 11, 2022, I filed an emergency motion, simultaneously with the Board and Delaware Supreme Court, appealing the refusal of the Board to afford me an opportunity to prepare a defense, gather facts, research and perform discovery.

9. The Delaware Supreme Court denied my appeal, since the unofficial decision rendered by the Board maliciously designed to prevent a fair opportunity for me to be heard and appeal, was not deemed a final appealable order by the Delaware Supreme Court.

10. The Board rendered an order later on January 11, 2022.

11. Without delay, I appealed this order with the Delaware Supreme Court on January 12, 2022.

12. The next day, January 13, 2022, I filed a motion for an emergency immediate decision on my January 12, 2022 appeal.

13. The following day, January 14, 2022, the State brought an answer to a motion rendered moot to harass and distract me, knowing I argued I did not have enough time to prepare and present a defense, with no opportunity for discovery or to call witnesses.

14. The day after that, Saturday, January 15, 2022, I served a different motion with the Board to call specific witnesses, requesting subpoenas, and additional time to send Requests for admissions and interrogatories to Defense Counsel, which are necessary for my defenses to this case, the illegality of the proceeding as applied, motivated by the state's desire to punish me for my exercise of protected conduct in contravention to the First Amendment applicable to the State pursuant to the 14th Amend., and in violation of the Equal Protections Clause

by disparate treatment towards me based on my religious beliefs and poverty, deeming me unworthy to be heard and unworthy of other Constitutional rights.

15. Immediately after the holiday weekend, two business days after my appeal, on Tuesday, January 18, 2022, the Delaware Supreme Court denied my appeal, which was based on protecting my fundamental rights. (Ex C., attached Order, dated January 18, 2022, Ex D, prior Order of the Supreme Court, dated January 11, 2022, Ex F, prior order of the Board, dated January 11, 2022).

16. My defense of subject matter jurisdiction is based on the Delaware Supreme Court's participation in inciting the illegal proceeding, as applied.

17. On my January 15, 2022 motion filed with the Board, I noted the court's apparent participation, and the need to cross examine Chief Justice

18. The Court maliciously indicated, indirectly the right to a fair, impartial, opportunity to be heard, opportunity to defend basic liberties was somehow frivolous, to allow the lawless reign of lusts, their will be done, instead of honoring the Constitutional protections afforded to me, the least of these, in violation of the Equal Protections Clause, and substantive and procedural due process clause. (Ex. C)

19. The Delaware Supreme Court is depriving me of an opportunity to be heard and a fair trial. The Board denies me the right to prepare a defense, to subpoena witnesses, and cross examine necessary witnesses. This is not a lawful

proceeding. This is my hanging but for my belief in Jesus the Christ. I am in great immediate danger.

20. The Court indicated it would not hear any frivolous motions, giving a colluding sign to the Board not to file an official order, to prevent my opportunity to be heard on appeal.

21. On January 18, 2022, the Board rendered a decision, while not placing the decision in an official Order with the intent to deprive me of the opportunity to be heard on appeal. (Ex. B).

22. An unlawful secret proceeding is scheduled against me on Friday, January 21, 2022, with the purpose to punish me for exercising my religious beliefs, speech defending the exercise of such beliefs without government sponsored burdens, and petitions relating to my exercise of fundamental rights, and my associated rights as a Christian, as an American and as an attorney to believe in Jesus Christ without compromise, and without sacrifice of fundamental rights or my license to practice law. (Ex B)

23. The Supreme Court appears to be conspiring with Defendants to punish me in violation of 42 USC Sections 1983, 1988, and in potential violation of 1985(2), with intent to harass and interfere with my assertion of Constitutional rights, by depriving me of a fair opportunity to be heard.

24. The Court and its members must be included on the Complaint as necessary Defendants, including Chief Justice Collins J. Seitz, Jr., Justice Traynor, Justice James T. Vaughn, Jr., and Justice Tamika R. Montgomery-Reeves. The latter three reviewed and rendered orders in *Kelly v Trump*. I seek equitable relief and nominal relief for deprivation of my constitutional rights.

25. I am grateful I informed the Court of my intent to add the Delaware Supreme Court and its members as Defendants, prior to receipt of the January 18, 2022 state Supreme Court order by service of my Motion, *Plaintiff's Second additional motion pursuant to FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) to amend findings of facts and alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice*, incorporated herein by reference in its totality.

26. My intent is now cemented by the great injustice towards me, and injustice towards all Americans by disparate selective application of who is worthy of Constitutional rights, by denial of my rights merely because they disagree with my personal beliefs.

27. In America I am free to believe differently, even have beliefs others find repugnant, or unsound. In America I should be free to worship Jesus Christ without sacrificing fundamental rights, and without sacrificing my paid for active license to practice law.

28. On October 26, 2021, I asked a Court representative, Renee Buskirk, to ask the Chief Justice whether he filed a complaint against me to get De-Lapp and the ODC, in hopes to get an affidavit to prevent the need to subpoena the Chief Justice as a witness. (Ex. B)

29. To my horror, I discovered Renee appeared to work for Defendant, ODC, as I later discovered her on an email with the Defendants. (Ex. F)

30. The Defendants knew of my desire to question Chief justice and other witnesses. I asked for opportunity to perform discovery in hopes to gain answers in a gentler form than subpoenaing witnesses. (Ex. B) However, with the recent denial of the Board on January 11, 2022, and denial of the appeal to the Supreme Court, dated January 18, 2022, I had no choice but to act in presumptive haste by filing a motion on January 15, 2022 to subpoena witnesses to cross examine during the state court hearing.

31. The Delaware Supreme Court's assertion relating to ignoring frivolous appeals, while not calling the appeal frivolous is a signal for the Board not to render an order so as to deprive me of the opportunity to be heard on appeal.

32. The Delaware Supreme Court's assertion that having an opportunity to prepare and present a defense based on 1. illegality of proceeding as applied, and 2. lack of subject matter jurisdiction, due to its own incitement or participation in inciting its arms of the court to attack me, but for the exercise of fundamental

rights, is unworthy of consideration, is clear evidence of its inability to be impartial in my case.

33. I object to the illegal proceeding as applied. I object to the deprivations of my substantive and procedural due process rights, as applied to me by denying me opportunity to research, collect evidence and prepare a defense. I objected to lack of notice and the form of notice provided as insufficient by the Board for any hearing. I objected to the denial of my right to cross examine and present a defense in violation of the 6th Amend.

34. The State must meet strict scrutiny to overcome any of my objections, which it cannot meet, rendering these violations of my Constitutional rights unexcusable.

35. I am incredibly disappointed in the lawlessness exhibited by the state.

36. I also objected to the closed proceedings, and requested the proceeding be conducted in open court to protect me from secret, concealed collusion from the state to let their will be done, instead of applying limitations on the state with the rule of Constitutional law.

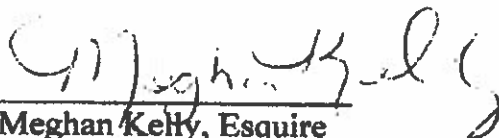
37. On January 18, 2022, I filed a different motion with the Court, the Court is scheduled to receive today with information that I include and incorporate herein by reference in its totality.

38. I do not waive my motions to exemption of PACER fees, but am filing this now, so as not to violate a greater sin against God by failure to assert my rights. Not all sins are weighted the same per Jesus the Christ. (*Matthew 23:23*). Injustice in the courts is damnable per God, by loving costs, convenience and comfort more than God or one another. (*Amos 5:15*); (*Also see, Isaiah 10:1-2* “Woe to those who enact unjust statutes and issue oppressive decrees, to deprive the poor of fair treatment and withhold justice from the oppressed.” Whenever God says “Woe to you” I believe it means damned to hell are you should you not repent by unhardening your head and unhardening your hearts to love to overcome lusts that lead to the second death.).

Wherefore I pray the Court grants my motion to appeal and immediately reconsiders my motions for a temporary restraining Order and preliminary restraining order to enjoin the hearing scheduled January 21, 2022.

Dated Jan. 19th, 2022

Respectfully submitted,


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968
(Word 2, 237)

Appendix K

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

The Honorable Colm F. Connolly

Care of the Clerk of Court

Office of the Clerk

United States District Court

844 North King St Unit 18

Wilmington, DE 19801-3570

RE: / Kelly v Swartz /doctored praecipe/ concealing elimination of key witness by retiring Arline Simmons and Katrina Krugar/ Free speech argument ruling that DRDC Rules 12 and 13 are unconstitutional per se and as applied

April 26, 2022

Dear Honorable Colm F. Connolly:

On Friday, April 22, 2022, with a heavy heart, I went to the Chancery Court in Sussex County to pick up the attached praecipe, dated October 5, 2022, labeled as **Exhibit A**. A Chancery Court staff member, Arline Simmons wrote on the praecipe, without my authorization, testifying as a witness without cross examination, on a public court record, misleading courts on appeal, which contributed to the confusion as to why I could not serve US Attorney General, David Weiss in *Kelly v Trump* Chancery Court No. 20-0809, DE Supreme Court No. 119-2021, and United States Supreme Court No., 21-5522.

I did not know Arline Simmons wrote on it, and could not understand why I was not issued the Summons for the First Amended Complaint or the Second

amended Complaint for local counsel, US Attorney General David Weiss, through the civil process clerk. The handwritten notes give some clarity.

Per the attached exhibit, incorporated herewith as **Exhibit B**, I wrote a letter dated July 12, 2021 and filed with the Delaware Supreme Court, upon discovery that the Civil Process clerk's address was crossed off. Arline Simmons, flipped through the documents and instructed me to cross off the address, with initials. I complied, thinking she may have found a typo, not knowing this would prevent service to the Civil process clerk.¹ In tears I lamented, "I was booby trapped by the Court staff Arline Simmons." Attached, please find **Exhibit C**, the praecipe to serve Delaware local counsel, through the Civil Process clerk, with the address crossed off and my initials, through the instructions of Arline Simmons.

The signature pages were apparently switched. See **Exhibit D**, the praecipe with the switched signature page.

¹ I apologize that I am a poor typist. In high School I did so poorly in my typing class that I dropped out so I did not affect my GPA, which was over 100 because academic courses were weighted. My little brother, Andrew Patrick Kelly was valedictorian, class of 98 at Indian River High School, and my beautiful big sister Amanda Elizabeth Kelly Gordines and had a better GPA than I did too. I have family of beautiful, smart successful people. I am the least of these in my family and in the eyes of the world, but I am rich in faith for God, your honor. My father is a little ugly like I am, but my dad is my hero because he does that right thing, even at a material loss. My dad, the legendary R. Pat Kelly teaches high school, used to life guard at the beach, coached football and continues to coach basketball.

My dad makes doing the right thing look cool and he drove our prejudice against people of diverse races, socio-economic statuses and places of origin by using his coolness to drive out cruelty, when he taught Civics at Indian River High School, located in Sussex County Delaware. I was in Girl's State in High School only because my dad is smart. I listened to him speak of history on the car ride to school and repeated my father's captivating analysis, not mine, that dazzled my history teacher, Mr. Abbott. Mr. Abbott nominated me and Mary Wilgus. My Principal Dr. Patterson nominated me as student liaison. I had surgery in high school that made me forever weak. That is why I studied healthcare courses at Law School and a course at UD to improve our care that kills and harms and I believe damns people to hell. Just because I am poor, weak and ugly does not mean I am worthless your honor. I am priceless. I gave my life to God, not man or money that means I care about others as myself, and I cannot turn a blind eye in the face of oppression.

I did not understand why no subpoena was issued to me for the Civil Process clerk. Per **Exhibit E**, attached hereto, in a letter dated, October 19, 2020, I wrote Master Patricia Griffin regarding inter alias, that Defendants had 60 days to respond to my complaint as opposed to 20 days like a normal person, since they were agents of the federal government. On a side note, that is unfair, granting partiality and the luxury of more time to the powerful federal government, and less opportunity for the common lay person to assert their grievances against the federal government. I also received disparate treatment by the Chancery Court staff, and noted I acted as a party not as an attorney advocate, to alert the court it is okay for staff to yell at lawyers, but it is prejudicial to yell at parties. Id.

In a letter attached hereto as **Exhibit F** dated November 10, 2020 to the assigned Vice Chancellor, I noted I served President Trump and William Barr the Complaint and Amended Complaint, and stated, “The US Attorney for the District of Delaware has not been served... I requested subpoenas, including the one for the civil process clerk, in a letter to the Honorable Master, dated October 30, 2020.” (**Exhibit F** at 3, and the entire document, also see **Exhibit G**, the letter to Master Griffin, dated October 30, 2020, albeit it related to time constraints and removal.)

We were in a dangerous part of the pandemic when former President Trump was diagnosed with Covid-19, and I erroneously thought William Barr also contracted Covid-19.

Despite, the perils of germ spreading to and from notaries, the Chancery Court staff required I notarize documents. So, I sought a waiver, which the Delaware Supreme Court had already granted unbeknownst to the Chancery Court staff and myself.

Per **Exhibit H**, through a letter dated, October 9, 2020 to Master Patricia Griffin, a letter dated October 7, 2020 to the assigned Vice Chancellor of the Chancery Court, and a letter dated October 7, 2020 to the Delaware Supreme Court, I requested a waiver of the notary requirements to prevent loss of life and health, and copied William Barr on these requests. ²

The Delaware Supreme Court sent me a letter attaching the emergency order, while copying the Defendant's administrator to the Board of Professional Responsibility, Karlis Johnson. (**Exhibit I**).

Throughout this time I noticed disparate treatment towards me, based on religion, political beliefs or association or poverty in violation of the equal

² Albeit your honor I made a mistake by not sending copies to local counsel, David Weiss. My mistake is not a mental disability, but based on my desire to act quickly to prevent irreparable loss in terms of government incitement infringement and loss of my First Amendment rights. I did not have easy access to research or even a working computer, or a printer at the time. I did not make the same mistake twice in this case. I served the Defendants through their local counsel, Zi-Xiang Shen, despite the fact this court withheld issuing service of the complaint and amended complaint.

protections clause, by the Chancery Court staff, apparently based on religious belief, political beliefs and or poverty. Per **Exhibit J**, attached hereto, in a letter dated, December 1, 2020, I wrote the Master Patricia Griffin of the Delaware Chancery Court concerning the prejudicial treatment based on protected beliefs and activity, and attached emails to **Katrina Kruger and Arline Simmons concerning the same**. (Emphasis Intended)

On or about November 6, 2020, I wrote Master Patricia Griffin regarding her staff, Arline Simmons, misleading me to almost miss my filing deadline to appeal, attached hereto as **Exhibit K**.

I sought discovery and alerted the Defendants of potentially calling Arline Simmons as a witness in the state proceeding. To my absolute horror, as I picked up the Praecipe dated October 5, 2020, on Friday April 22, 2022, I discovered Arline Simmons and Katrina Kruger were no longer with the Chancery Court, apparently encouraged to retire to protect themselves and the Court in this federal proceeding. Albeit I did not desire to sue or harm either of these individuals. Though, Arline Simmons mistreated me, she is my friend. I desired to safeguard my ability to worship Jesus without government incited economic, social, or physical persecution for my religious beliefs in God as savior, not as money as savior.

Defendants prevented discovery concerning potential witnesses to hide the fact these two witnesses with first hand knowledge, were no longer available through the state in the Board proceeding.

I emailed Defendants I did not want Arline Simmons to get into trouble, before learning she was no longer with the Court. I merely desired the ability to exercise my constitutionally protected liberties without state persecution. I also noticed another government agent with a connection to me, Secretary of Education Dr. Celeste Bunting, retired, probably by state pressure after learning of her ties to me. **(Exhibit L)** Please note, I inadvertently sent the email, in Exhibit L, to the wrong Lisa, and meant to send it to Lisa Dolph, to end interference in my active case.

In addition, I noted Judge Smalls of the Court of Common Pleas, may have been forced to retire when the state learned, he told me to go back to Pennsylvania, not knowing I am from Delaware, showing prejudice based on place of origin. **(Exhibit L)**. He was the first judge I made an appearance before, as an attorney on behalf of another lawyer who requested I fill in for them. Please see my letter to the Delaware Supreme Court concerning partiality by judges, incorporated herein by reference at D.I. 4 Exhibit 5. (Also see, D.I. 4, Exhibits 2, 3, 4 and 6. regarding partiality towards money and convenience at the cost of injustice by the state's agents, towards religious beliefs.)

I have been devastated, reasonably emotionally distraught, at the prospect Arline and Katrina may have lost their jobs because of the Defendants desired to conceal disparate treatment by state actors towards me based on disdain for my religious, political beliefs, speech, affiliation or poverty. I did not want them to lose their job. I did not desire to sue them either. I care about them. I merely love God more than them, other people and my own life, and must assert my right to love God without government economic, social or physical persecution. I gave my life to God your honor, not man or money.

I am also disappointed in Defendant David White, and Kathleen Vavala for persecuting me based on my religious-political petitions, speech, association and exercise. I sent them page 39 of the Fourth Industrial Revolution which includes the elimination of lawyers, as you know there is a plan to eliminate judges too, to automate justice in the decades to come. **(Exhibit M)**

David White knows I am a good lawyer. I drafted the attached pleading for an arbitration he handled upon my request for Insight Homes. **(Exhibit N)** I understand Insight retained him for other cases.

I believe the ODC's function worsens the practice of law and guarantees injustice by its focus on serving business greed not good, by focusing on what I believe is the mark of the Antichrist, partiality towards self, looking after their own, the appearance of the profession, money, convenience, positions and power,

not unearned required care for the public and professionals, while protecting individual liberties from satanic mob reign of lusts. I hate it when judges in courts misbehave by feigning humility to get out of doing their duty by indicating “the people elected the President or congress, I cannot overstep by rewriting the law, or acting as executive by cry babying “political question.”

The Court must balance these two imbalanced branches to protect individual liberty, the freedom of the individual from the satanic conditional conformed reign of lusts, with no ability to unconditional love. The Courts must exercise their duty to prevent the planned elimination of the dollar, the intended crash of the global economy, and the planned elimination of governments down the line. The Courts must not give into temptation to immediate gratification, ease, position, profit, only to lose it all down the line. There are plans for our Country’s harm and the world’s harm. The World Government Summit met on March 29-30, 2002, and alluded to a cold war after a hot war, and a depression and much more concerning issues. If they predict it, they plan it. The World Bank and the International Monetary Fund, aka, IMF, also had their yearly meeting, April 18-24th and plan inflation. Your honor, can place his foot down on the President or Congress and prevent the planned inflation and worsening conditions to cause a crash of the dollar and world economy, albeit in another case. You are my hope of a hero, as well as the Delaware Courts, who persecute me now. Jesus says justice, with mercy and

faithfulness are more important commands than laws dealing with material gain. Citing *Matthew 23:23*. God teaches partiality is sin. Justice in the courts is a command. *Amos 5:15*. You may save lives and eternal lives if you freely choose, your Honor. I hope you do.

With regards to this outside Court balancing the partiality and injustice guaranteed by self-regulation of state courts, lawyers, professional lawyer associations and Professional Disciplinary Procedures and counsel, the ODC stifles improvement and correction within by requiring training all lawyers through CLE's to equally provide poor service, seeking sameness, conformity, uniformity, not growth and learning.

As I mentioned previously in Exhibits and in my Complaint, comments of diverse suggestions for improving the practice of law, were not well received at continuing lawyer classes. The State through their agents desire "their will be done," like Satan, controlling attorneys like widgets, human commodities, not caring for them and the public. (See, 1 *John 5:19*, "We know that we are children of God, and that the **whole world** is under the **control of the evil one**." (Emphasis intended), note the reference to control, not caring for humanity while protecting their freedom to choose even choose wrongly. When we force our will upon others, that is not freedom but tyranny, albeit just laws govern, guide and correct people who kill, steal and destroy to serve business greed, the mark of the beast,

conditionally caring for your own with no unconditional love); (See also , 2 *Corinthians* 4:4, “the **god of this world** [Satan] hath blinded the **minds** of them [with enticing temptations of reward, avoidance of harm, societal peer pressure, shame, praise and conditional caring with no God in them, controlling humanity through temptations] which believe not, lest the light of the glorious gospel of Christ, who is the image of God, should shine unto them.”)

The ODC merely treats the practice of law as a business, cold hearted while feigning superficial optimism and concern to sell a product to the exploited public, while treating lawyers as human capital as opposed to human beings with souls.

The Courts provide a government service to all unearned, required, even to those with religious-political beliefs, religious-political exercise which state agents do not understand, disagree with and find repugnant, like my own your honor. Maybe your honor, may require the Board and the ODC to care for, not control lawyers, while encouraging improvements of the profession, instead of stifling innovation through conformed bad standards that exploit and oppress people for convenience and profit.

I filed the attached complaint against Judge Kavanaugh, and it appeared the ODC cowardly cared about retaliation from its ruler, the highest court, Supreme Court Justice Kavanagh, and did not improve the profession, just created a false appearance of justice. (**Exhibit O**).

The time for correction for Justice Kavanagh was during the appointment of nominees. That time has passed. Vengeance is injustice, with no room for correction that guides the misguided to become better by love, not by material gain or money. So, no impeachment should be made for him or for Justice Thomas regarding Anita Hills.

Upon learning this hard truth of the ODC's marketing function creating injustice guaranteed, I believe the Courts should not self-regulate, but should allow impeachment to be the only means of a government check. There is corruption and internal bias to look after your own at the public's expense, while creating the illusion of justice, it creates injustice guaranteed. That said, I do not desire Justice Kavanagh or Justice Thomas to be impeached for their past errors or with regards to Justice Thomas's, his wife's conduct relating to the attempted coup on January 6, 2020. Half of the nation were misled by former President Trump's sweet nothings. Courts must guide the misguided, not punish them for being human as opposed to cold hearted machines seeking cold hard or electronic currency.

I also desire to include additional count and claim, to declare Disciplinary Rules 13 and 14 Unconstitutional, in violation of our Constitutional protections relating to free speech, and inhibiting gathering aide in my defense to accusations against me for my political-religious petitions, speech, association and exercise.

Delaware Rules of Disciplinary Procedure, Rule 13 requires:

- a) Confidentiality. Prior to the Hearing Panel's submission to the Court of its final report, and except as otherwise described in these rules, disciplinary and disability proceedings and the official record in such matters are confidential. If the Hearing Panel's report recommends that the matter be dismissed, that a lawyer not be transferred to disability inactive status, or that a private sanction be imposed, any further proceedings by the Court and the official record in the matter are confidential unless and until otherwise ordered by the Court. (b) Protective orders. Upon proper application with good cause shown, or on a sua sponte basis, the Chair or Vice Chair of the Board, the Chair of the Hearing Panel, or the Court may issue appropriate protective orders with respect to any proceedings, reports, documents, or other information which may otherwise be made public, for the purpose of preserving confidentiality. (c) Complainant's right to appear. The complainant in a disciplinary matter, if any, shall have the right to appear at any Board hearing on sanctions or any Court hearing on a petition for interim suspension relating to the matter for the sole purpose of making a statement on the record regarding the matter. (d) Requests for confidential information. A request for the release of confidential information as described under these Rules shall be made by written application, with good cause shown, directed to the Administrative Assistant. Such application shall be considered and determined by the Court. (e) Release of confidential information. The work product of the ODC may not be disclosed or released except pursuant to Rule 13(f). The pendency, subject matter, or status of a disciplinary matter may be disclosed or released if: (1) the respondent has waived confidentiality in writing; (2) the proceeding is based upon allegations which include the conviction of any crime; (3) the respondent has been placed upon interim suspension or disability inactive status; (4) such disclosure or release is necessary to obtain the assistance of another person, agency, or organization, provided that such person, agency, or organization agrees to maintain the confidentiality mandated by these Rules; (5) the proceedings are based upon allegations which have otherwise been made public; or (6) with the approval of the Court, such disclosure or release is necessary in order to correct false or misleading public statements with respect to any otherwise confidential proceeding or information, or is necessary to prevent public confidence in the disciplinary system from being undermined. (f) Cooperation with criminal justice authorities. Any evidence or information obtained through the disciplinary process indicating criminal conduct by a lawyer, including documents,

transcripts, and work product, or any selected portions thereof, may be disclosed or turned over to the appropriate criminal justice authorities for their independent review and investigation. (g) Duty of participants. All participants in a proceeding under these Rules shall conduct themselves so as to maintain the confidentiality mandated by these Rules. (Amended, effective May 14, 2008.)

Delaware Rules of Disciplinary procedure Rule 14 provides:

“The ODC shall publicly disseminate all information relating to disciplinary matters and proceedings as is consistent with these Rules. In particular, the ODC shall transmit notices and information regarding the imposition of all public discipline, transfers to or from disability inactive status, or reinstatements to:

- (a) the disciplinary enforcement agency in any jurisdiction in which the respondent is admitted,
- (b) the chief judicial officers of all courts of this State,
- (c) the chief judicial officers of all federal courts located in this State, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court,
- (d) any national data bank maintained for the purposes of reporting disciplinary action relating to lawyers, and
- (e) the news media.”

Rule 13, allegedly protects the accused, including me, while protecting the ODC from libel law suits. It does not require I keep the proceeding confidential.

However, Rule 14, gives the illusion the State, ODC, and coconspirators have immunity to verbally persecute the accused, should they win, , including me inciting social, economic and physical persecution verbal government attacks cause, based on my religious-political beliefs, religious-political speech, religious political association, and religious-political petitions.

I argued the Defendants are not immune from suit and Rule 14 will not protect them should they attack me further in the future, per the analysis in my Complaint. See Id. 2.

With new and additional information commonly arising in my case, I have a running request to **amend the complaint to conform with additional and new evidence**, as they arise at the end of the proceeding, to include additional or new claims or evidence.

I am also mailing you and Defendants electronic copies

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused oppression and injustice per Jesus the Christ's teachings in *Matthew 6:1-4*. I sinned and I am sorry your honor.

2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.

3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.

4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

5. Pictures of me attending a Democratic function, misbehaving, when I should have been available to all people, regardless of party to prevent **conditional conformity** with the party's agenda, which prevents **unconditional love** and service for all citizens, regardless of each individual's position and party affiliation.

6. Video of me lamenting about how Nancy Pelosi and congress people misbehaved by failing to impeach. Nancy Pelosi remarked on respecting the flag when she transferred the articles for impeachment, placing her hand to my face on my article of impeachment to safeguard the NFL player's freedom to associate and speak out on alleged disparate treatment towards Black Americans in the judicial system. Our officials put on a deceptive horse and pony show, feigning concern on government racist persecution of the people. They do not seek justice for the oppressed as I asked them to. They misbehave, and are need of Court correction and guidance.

7. PDF's of the pleadings I filed against the democrats, suing them without violating Jesus Christ's teachings by asking for donations or signatures, which I believe damns people to hell. I would be a bad leader if I encouraged conduct that harmed people in this life and damned them to hell forever your honor.

8. I also attached some of my marketing material so you can understand my heart, but I feel dirty. Government is a service not a business. Officials should be elected not based on appearance or popularity but based on their heart. The people should vote on their ideas not appearance. Jesus teaches us judge correctly, not based on appearance. The title marketing appears naughty to me, your honor.

I am not a bad guy. I am an imperfect Christian, not crazy. I freely choose to have the mind of Christ, not the mind of the world.

Thank you for your time and attention to this important matter.

Very truly,



/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

Bar Number 4968

(4,039 Words)

April 26, 2022

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

Dated: April 26, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

2e MK

Table of Exhibits for Letter

Exhibit A Doctored up praecipe, dated October 5, 2020, filed October 6, 2020

Exhibit B July 12, 2021 Letter to the Delaware Supreme Court regarding “I was booby trapped by the Court staff Arline Simmons”

Exhibit C The praecipe to serve Delaware local counsel, through the Civil Process clerk, with the address crossed off and my initials, through the instructions of Arline Simmons.

Exhibit D The praecipe with the switched address/signature page.

Exhibit E Letter to Master Patricia Griffin regarding I am not an attorney advocate in the case, and the 60 days allowed for Federal agents to respond.

Exhibit F Letter to Assigned Vice Chancellor, dated November 10, 2020, regarding I served both Attorney General William Barr and President Trump, both the complaint and amended complaint, and requested subpoenas to serve local counsel Unites States attorney General David Weiss through the civil process clerk.

Exhibit G Letter to Master Patricia Griffin, dated October 30, 2020, regarding removal, immunity removed, and President Lincoln’s misbehavior that President Trump copied.

Exhibit H Letters to the Delaware Courts requesting waiver of notary requirements since a party President Trump contracted Covid-19 at the time.

Exhibit I Letter from the Court indicating a waiver of notary requirements has already been issued unbeknownst to the Chancery Court staff and myself.

Exhibit J Letter to Master regarding disparate treatment, based on religion, political beliefs or association or poverty in violation of the equal protections clause, with attached emails to Court staff Katrina Kruger and Arline Simmons.

Exhibit K Letter to Master regarding Chancery Court staff misled me to almost miss the appeal deadline.

Exhibit L Email to David Weiss and opposing counsel regarding Dr. Bunting, Judge Smalls potentially relating to my petitions.

Exhibit M Email to opponents, with page 39 of the Fourth Industrial Revolution, relating to the elimination of lawyers, and courts down the line.

Exhibit N My pleading before arbitrator, Defendant David White.

Exhibit O An ODC's response to my complaint against Justice Kavanaugh, and the complaint against Judge Kavanaugh

Electronic Data

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Exhibit A

EFiled: Oct 06 2020 03:29PM EDT
Transaction ID 65994549
Case No. 2020-0809-PWG



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Bar Number 4968

October 5, 2020

Via/Hand Delivery
Register in Chancery
Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

REGISTER IN CHANCERY
GEORGETOWN, DE 19947
2020 OCT - 5 A 11:25

RE: *Meghan Kelly v. the President of the United States Defendant, Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Donald Trump, his official capacity as President of the of the United States Case No. 2020-0809*

Dear Honorable Court:

Plaintiff, Meghan Kelly, has filed with this Honorable Court, on behalf of herself, Pro Se, a Verified Complaint, exhibits thereto, Motions for a Temporary Restraining Order, a Motion to Expedite and a Memorandum of Law in Support of Plaintiff's Motions for a Temporary Restraining Order and Expedited Relief against Defendant.


Pursuant to Chancery Court Rule 15, Plaintiff has also filed a Motion to Amend her Complaint, a First Amended Complaint and an Order with this Honorable Court.

Please prepare a summons directing Plaintiff to serve said summons and a copy of the Amended Complaint, Plaintiff's Motion to Amend the

Complaint and Motion for an extension to serve both the Complaint and Amended Complaint together, the Verified Complaint, exhibits thereto, Motions for a Temporary Restraining Order, a Motion to Expedite and a Memorandum of Law in Support of Plaintiff's Motions for a Temporary Restraining Order and Expedited Relief against Defendant, on the defendants at the following address, via US Mail, return Receipt:

**President Trump
C/O Civil Process Clerk for
the US Attorney's Office for the District
of DE, US Attorney's Office
1313 N. Market St.
Wilm., DE 19801**

Please contact me should this Honorable Court require additional information. Thank you.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
Pro Se
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939

*10/5/2020 Meghan Kelly Esq. Said to efile this
Letter of instructions + RPT not to drop Summons.*

AS

Exhibit B

MEGHAN MARIE KELLY, ESQUIRE

**34012 Shawnee Drive
Dagsboro, DE 19939**

July 12, 2021

RE: The reason for the Withheld Subpoena to the Civil Process Clerk

Dear Honorable Justices of the Delaware Supreme Court:

I am in tears. Today July 12, 2021, I found the reason why I never got the subpoena for the civil process clerk to serve the Amended Complaint. I was booby trapped by the Court staff Arline Simmons, a self-proclaimed (former at least) Trump supporter, I thought was my friend. It was not Katrina or the Honorable Master or any Vice Chancellor.

I just saw Arline flipped my October 12 sheets, my requests for summons to the Amended Complaint. I crossed out the correct address per her guidance. I remember she directing me to do so for the amended complaint letters of instruction. Attached, please find the letters dated October 5, 2020 in a single 6 page document.

She handed over the two subpoenas, but did not hand over the one for the civil process clerk. When she provided them, she said I could not continue the action without a Delaware attorney. I remember thinking she is not giving me permission? Why else withhold the one subpoena, while handing over two.

I followed up on the missing subpoena. She requested I file additional documents after documents. I drafted document after document, full of anxiety to hurry the matter since I requested immediate expedited relief.

I did not understand why I could not get the subpoena. I had served both Trump and Barr both complaints, the Complaint and Amended complaints in the same box to each.

It would have been okay for the Master to make a determination to withhold subpoenas pursuant to her power under the statute in question, Del. Code Ann. tit. 10, § 8803(c). I was getting upset by the fact the court gave me two instead of none or all three. Why mislead me into thinking I may go forward when she intended to halt service?

Arline indicated I needed to file additional paperwork to get the civil process clerk's subpoena. I drafted paper after paper, but decided to hold off since I was intending to swiftly file a third amended complaint. I was eager and sought to expedite the case, to cure errors quickly, and thought additional paper may slow it down at that point, despite Arline's suggestion.

Arline is a self-proclaimed supporter of Trump, and believes differently than my religious beliefs. I am ardent in separation of church and state to prevent inhibiting people's free will, by cloak of government

authority, such government servant, employee or agent's shared belief inherently creates to those he or she serves.

I am in tears. Attached, please find the scans I made of all 6 pages of my letters requesting the summons. See how the civil process clerk's address is missing?

I got booby trapped by Arline when she sought to obstruct me from receiving notice so I could timely file a notice of appeal from the November 2, 2020 determination, by instructing me to cross of the address, switching the pages, and then also by telling me to file more docs.

I am in tears. I am devastated. I cannot go to the ODC since they went after me for standing up for Jesus per Judge Clark. I just discovered the reason why I did not get the subpoena now.

This is not the master's fault nor is it the Chancellor's fault. I need some time because I am so upset and heart broken.

I care about God and my case, and I care about the integrity of the court too, impartiality and justice in the courts are commanded by God too. We should not cover up evil with more evil, deceit. We should fight for truth to our own death to the end, albeit with words not weapons by shedding light on darkness to transform it, correct it to become light. See, *Ecclesiasticus 4:28*.

If possible, can you take a little more time to respond to my motion? I do not want to hurt my heart. I am devastated, shocked, and need time to regroup and heal from this painful distraction.

Thank you.

Dated: July 12, 2021

Respectfully submitted,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(Word Count 720)

Appendix L

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

December 4th, 2021

Office of the Clerk
United States District Court
844 North King St Unit 18
Wilmington, DE 19801-3570

RE: Kelly v Office of Disciplinary Counsel Patricia Swartz, 21-1490 (cfc) New and Additional evidence of Defendants' bad faith and harassment

Dear Honorable Chief Justice Colm F. Connelly,

Attached hereto please find new and additional evidence of Defendants' harassment and bad faith that did not occur until after I filed my Complaint and pending motions that should be considered by the Honorable Court in determining the outstanding motions in the interest of justice.

Please contact me by mail or email with any questions. Thank you.

Dated December 4th, 2021

Respectfully submitted,

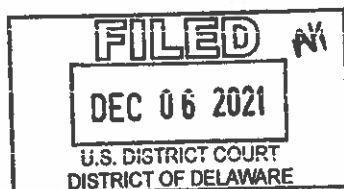
Meghan Kelly

Meghan Kelly, Esquire
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Bar Number 4968

meghankellyesq@yahoo.com

No phone

(Word Count 143)



Appendix M

Appendix M

U.S. COURT OF APPEALS, THIRD CIRCUIT

Meghan Kelly)	
Plaintiff,)	Appellate Court
v.)	No.: 21-3198
Disciplinary Counsel Patricia B.)	No. 22-2079
Swartz, et al.)	
)	District Court
Defendants.)	No.: 1:21-cv-01490-CFC

Appellant Plaintiff Meghan M Kelly's Motion to stay the Proceeding until the conclusion of the originating disciplinary proceeding, until final non-appealable determinations are made or the time of appeal has lapsed. I further move the Court, for good cause for permission to file the "for cause" motion 30 days after the stay is lifted.

I, Appellant, Plaintiff Meghan M. Kelly, move this Court to stay this proceeding, until conclusion of the originating disciplinary proceeding, until final non-appealable determinations are made or the time of appeal has lapsed. I further moves the Court, for good cause, for permission to file the "for cause" motion 30 days after the stay is lifted.

1. On January 1, 2023, I previously requested this Court grant an extension of time in the amount of 45 days, which I incorporate herein by reference, incorporating each document referred to therein herein too. 3DI 126.

2. I understand this Court must afford opposing counsel an opportunity to respond in accordance to the rules. The date they have to respond is on or before the due date of the brief January 10, 2023. This places me in a dangerous position where I may potentially lose the opportunity to be heard in defense of my

First Amendment rights, and to prevent the loss of my license and opportunities associated for it for punishment for the exercise of my private petitions to alleviate a substantial burden and to seek relief relating to bar dues without selective application that disparately treats similarly situated attorneys.

3. I seek meaningful opportunity to appeal to another Court, the US Supreme Court, the original disciplinary Order and a reciprocating disciplinary Order.

4. Any determination by the US Supreme Court will affect this case, albeit I seek relief for state interreference and procedural due process violations in Kelly v Trump too.

5. There is evidence the Delaware Supreme Court retaliated against me for two petitions in January 2020 and February 2020, as well as petitions in Kelly v Trump.

6. The statute of limitations will soon expire to seek relief for the retaliations against me for petitioning the Court for relief on bar dues.

7. I do not feel well and require time to care for my health to sustain my health and life.

8. I lost data. I have had technical problems with regards to printing, computers and internet.

9. I will likely overturn the Delaware Supreme Court decision on appeal for procedural due process violations. It is not normal for Courts to conceal evidence in the accused favor my pleadings to fix the outcome, terminate potential witnesses, preventing their discovery, denying orders by ignoring motions or rendering email orders, lying by stating notice is sent out on a date I was not served and no opposing counsel was appointed yet, and other blatant procedural due process violations based on disdain for my religious political beliefs, speech, affiliation and petitions.

10. The Defendants are allowed to think my beliefs suck. Even if they think my religious beliefs suck, people who have beliefs that allegedly suck are protected by the First Amendment from government persecution for their religious beliefs, speech, petitions, exercise of beliefs and affiliation. US Amend I, XIV.

11. My beliefs are genuine. I believe in Jesus but I do not want to be persecuted by the government through government agents or government incitement of private conduct which selectively targets me based on unconformity with government religious belief.

12. The Delaware Supreme Court placed my Delaware license to practice law on disabled inactive on August 10, 2022.

13. I seek the opportunity to access to the courts to appeal this Order, not the guarantee of being heard. It is the opportunity I fight for. There is no hope of justice when people are denied the right to petition the courts for help.

I. A stay is required to prevent increased potentially needless costs from creating an obstacle to my access to the Courts in defense of my first amendment rights, and the compelled violation of my religious belief against indebtedness

14. Fighting multiple cases at once creates a substantial burden upon my access to this court and the US Supreme Court on appeal, due to time constraints, my poverty and religious beliefs against debt. (*Bible, Romans 13:8*)

15. I require a stay from this Court in order to seek a meaningful opportunity to appeal the Delaware disciplinary order with the US Supreme Court.

16. A determination on appeal by the US Supreme Court of the original disciplinary matter may lead courts to vacate pending disciplinary proceedings.

17. A stay is required to protect my meaningful access to the courts, this court and other courts.

18. The additional law suits have increased costs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

19. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs.

20. I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental rights.

21. I am utterly poor. A stay is required to prevent a substantial burden and obstacle to my access to the Courts, and compelled violation of my religious belief against debt, in contravention to my First Amendment right to access to the Courts applicable to the State via the 14th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *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.") *Citing, e.g., Pryor v. Brennan*, 914 F.2d 921, 923 (7th Cir. 1990); *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.")

22. “Because this case implicates the [Constitutionally protected] right of access to the courts,” in defense of my First Amendment rights of speech, religious belief, religious exercise, and association, the government’s decision to grant a stay, based on poverty, is still determined under a strict scrutiny basis test. *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

23. 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)

24. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giaratano*, 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

25. I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religious-political belief, exercise of religious and political speech, and association as a

party, attorney, democrat, and Christian, without government incited persecution, but for my exercise of fundamental rights.

26. The Delaware Disciplinary proceeding and determination against me creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work at a law firm. The State of Delaware's conduct harms my reputation to make me less attractive to other employers by harming my prospects of employment by the libelous published accusations against me. 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 is protected.

27. Fundamental First Amendment rights of speech, belief, exercise of belief, and association are implicated, in this case. Thus, this Court must have a compelling reason to deny my request for a stay of the proceeding to prevent irreparable to me, narrowly tailored to meet the important justification.

28. There is no compelling reason to deny my request for a stay. Defendants are not prejudiced, nor is the public. Nor is any justification narrowly tailored to meet any compelling reason. This Court must grant a stay to prevent an

obstacle to my access to the courts. This Court may stay the case, with no prejudice, while potentially avoiding needless work for the court, the appellate courts and the parties.

29. However, I face an undue burden should this court deny my request for a stay of the proceeding. I risk loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

II. Legal Authority to grant a stay

30. “This Court has discretion to stay a civil proceeding.” *Sec. & Exch. Comm’n v. Hvizdzak Capital Mgmt.*, Civil Action 1:20-154, at *1-2 (W.D. Pa. Aug. 11, 2021), *Citing. Landis v. North American Co.*, 299 U.S. 248, 254 (1936); *Bechtel Corp. v. Local 215, Laborers’ Int’l Union*, 544 F.2d 1207, 1215 (3d Cir. 1976).

31. “While staying a case is an extraordinary measure, ...courts will not hesitate to grant a stay when the interests of justice seem to require it.” *Id. Citing, United States v. Breyer*, 41 F.3d 884, 893 (3d Cir. 1994); *See Kashi v. Gratsos*, 790 F.2d 1050, 1057 (2d Cir. 1986); *see also United States Secs. and Exch. Comm’n v. Santillo*, No. 18 Civ. 5491, 2018 WL 6039324 (S.D.N.Y. Nov. 2, 2018); *Aluminium Bahrain B.S.C. v. Dahdaleh*, No. 8-299, 2012 WL 5305167

(W.D. Pa. Oct. 25, 2012); *Walsh Secs., Inc. v. Cristo Prop. Mgmt., Ltd.*, 7 F.Supp.2d 523 (D.N.J. 1998).

32. Justice requires a stay in my case.

33. “The Court's discretion to stay a matter is ‘incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants. How this can best be done calls for the exercise of judgment, which must weigh competing interests and maintain an even balance.’” *Id.*, *Citing, Landis*, 299 U.S. at 254-55.

34. “In deciding how to exercise this discretion, the Court must ‘initially assess to what extent the issues in ... cases overlap, and consider the status of the ... case, including whether the defendant has been indicted.’” *Id. Citing, Int’l Fidelity Ins. Co. v. Podlucky*, No. 07-0235, 2007 WL 2752139, at *2 (W.D. Pa. Sept. 19, 2007); (*citing In re Derivative Litig.*, No. 06-02964, 2007 WL 1101276 (E.D. Pa. April 11, 2007)).

35. Per the Western District of Pennsylvania District Court, in *Sec. & Exch. Comm’n v. Hvizdzak Capital Mgmt.*, Civil Action 1:20-154, at *2 (W.D. Pa. Aug. 11, 2021), “the Court is not to consider whether [the Delaware Disciplinary proceeding and civil rights case] ‘overlap in their entirety,’ but whether and to

what extent the issues overlap.” Id. “The record presently before the Court [in my case] demonstrates adequate similarity of issues weighing in favor of a stay.” Id. at

*3. The two cases relate to the same facts and issues as the case before this Honorable Court.

36. After the Court examines the overlap of cases, then, the court must weigh the following factors: (1) the interests of the court (2) the Defendant’s interests and the potential prejudice to the Defendants of a delay; (3) the interests of third parties; and (4) the interest of the public; and (5) the prejudice to me. Id. *Citing, Golden Quality Ice Cream Co., Inc. v. Deerfield Specialty Papers, Inc.*, 87 F.R.D. 53, 55 (E.D. Pa. 1980)).

III. Factor 1, Interest of the Court

37. The Court has a strong interest in judicial efficiency. Staying this action could restructure the proceeding in this Court because collateral estoppel could prevent re-litigation of issues adjudicated on appeal in the original matter and in the civil rights proceeding. In addition, should the US Supreme Court vacate the original disciplinary proceeding, this case may be vacated as well. Thus, the interests of the Court weigh in favor of a stay, to prevent needless waste of judicial resources by a superseding US Supreme Court decision.

IV. Factors 2, 3, and 4, Defendant's Interests, third parties' interests and the public's interest

38. There is no prejudice towards the Defendants, third parties or the public by a delay, should a stay be granted. I agree not to practice law in this jurisdiction, without this court's authorization. I am retired in this jurisdiction. I require time and meaningful opportunity to not only defend myself on appeal in the original proceeding, but also to present my case in the civil rights proceeding.

39. I require time to preserve my life and health too.

40. On January 4, 2022, I discovered my Aunt Jackie's health deteriorated. I asked opposing counsel to please consider not objecting to my Motion for additional time in order that I may also have time to pray for my aunt Jackie before it is too late and she is dead, her fate sealed for judgment day for eternal life or death. See attached Exhibit A.

41. I require time to pray in order that she may have a fuller type of love with God please.

42. The public and third parties are not harmed by a stay. Yet, the public may be harmed if a stay is not granted, by setting a precedent that the state may eliminate Constitutional liberties in a government compelled exchange for the

license to buy in sell in a profession. Every citizen, holding a license, may lose Constitutional rights or be in danger of being adjudicated disabled, for merely believing differently than the state, or for standing up for their religious-political beliefs in Court, should I not be granted meaningful opportunity to contest the original case on appeal to the US Supreme Court and in the civil rights case.

43. I have good cause to contest the decision of the Delaware Supreme Court to place me on disabled inactive, as punishment for my exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and my exercise of the right to make religious-political petitions.

44. The Delaware Disciplinary proceeding is defective on its face. The record shows evidence of fraud, and collusion. The Court was not partial, but instigated the proceeding against me and colluded with the state.

45. The Delaware Supreme Court's members concealed evidence in my favor to prejudice the fixed outcome against me in aid of the Delaware ODC. The Court denied my requests for opportunity to perform discovery and for adequate time to prepare to hide the fact they terminated two court staff who are material to my case. The Court also secretly sealed four of my pleadings in Kelly v Trump that were material to my defense.