

## 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 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.<sup>1</sup> 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

<sup>1</sup> 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.1<sup>st</sup> 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,

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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 14<sup>th</sup> 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 6<sup>th</sup> 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).

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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).

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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).

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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*

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*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

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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

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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.

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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 13<sup>th</sup> Amend.

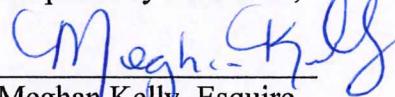
34. The Free exercise of speech, association, right to petition, and religious exercise, and freedom of conscience have not been sold, making it not a freedom, but a bargaining chip to exchange by relinquishment to serve business greed.

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)

I declare, affirm that the foregoing statement is true and correct under the  
penalty of perjury, dated 1/18/22

Meghan Kelly (printed)

Meghan Kelly (signed)

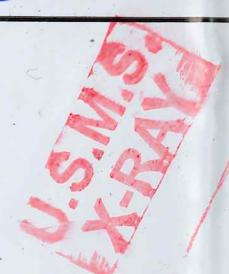
Meg Kelly  
 340 1/2 Shawnee Dr.  
 Dagsboro, DE 19939



**Handle with Care / Fragile**



**Office of the Clerk**  
**United States District Court**  
**844 N. King St. Unit 1F**  
**Wilm. DE 19801**



FILED

JAN 19 2022

U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

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**EXHIBIT 1<sup>ST</sup> 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, and 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 1<sup>st</sup> 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](http://www.de-lap.org)

Private: (302) 777-0124  
Toll Free: 877-243-3527  
Fax: (302) 658-5212  
[cwaldhauser@de-lap.org](mailto: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](mailto:cwaldhauser@de-lap.org) and/or Eleanor can be reached at [emkiesel@aol.com](mailto: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, Esq.*  
Eleanor M. Kiesel, Esquire, PhD, Lawyers Assistance Committee

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

Electronically forwarded with encls: [meghankellyesq@yahoo.com](mailto: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  
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# 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.

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Document: 155-3

Page: 23

Date Filed: 02/21/2023

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:

Case: 21-3198

Document: 155-3

Page: 26

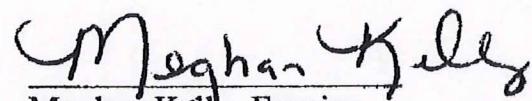
Date Filed: 02/21/2023

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)

Megh 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**

## EXHIBIT 2

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel/

**Re: Board Case NO. 115327-B/Motion for reargument Counsel/**

From: Meg Kelly (meghankellyesq@yahoo.com)

To: dhutt@morrisjames.com

Cc: meghankellyesq@yahoo.com

Date: Friday, December 17, 2021, 02:43 PM EST

Good afternoon,

Thank you for the message. I do not have any working phone. There is no way to get a hold of me by phone. E-mail, so long as I have internet may be the best way. I am receiving internet through a government program that may end February 18, 2022.

I am in receipt of the letter appointing you as counsel, received yesterday. I intend to file a motion for reargument and an objection to the appointment of counsel on religious grounds, and on due process grounds on Monday. I am pretty shaken up as I gave the court notice of my intent to object.

I will keep you in the loop. I have not drafted anything yet, and will appeal to the US Supreme Court should it be denied.

Thank you for forwarding the attachment relating to a hearing. I must file a motion for an extension of time, or in the alternative, maybe you can until a final determination on reargument relating to counsel.

I intend to be in Georgetown on Monday to hand in my motion for reargument. May I drop off a memory stick of documents to you in an envelop, for you to keep relating to the documents I filed, and Defendants' documents? I hope to get this done by Monday. I have not even started. If for any reason I am unable to hand you a memory stick on Monday, I will email you.

Please note in my answer I objected based on subject matter jurisdiction, and I have a case pending before the 3rd Circuit. (See attached).

I believe people go to hell for a lot of things. So I keep myself separate. I believe mental health and psychologists teach the mark of the beast as fact, conditionally caring based on relationship, reward and avoidance of harm as the goal, without unconditional love, chasing after desires and wants instead of laying down our desires to care to use our conscience mind to choose to do God's will, by critically thinking to care to know, to love.

I am a Christian. The bible teaches let the holy spirit be your advocate when you are taken to court. I should not be forced to go to hell, forced to compromise my belief in Jesus by undergoing examinations I object to, in order to maintain my license to practice law.

Thank you for understanding and I apologize that they appointed you when I do not desire assistance. Either way, we will need an extension of time.

My answer was 100 pages. I objected on subject matter jurisdiction because the Delaware Supreme Court appeared to participate or instigate in the retaliatory proceedings against me. So, the prosecutor must not be the judge and jury too.

I hope you have a nice weekend.

I will provide you with what I file on Monday too. Have a great weekend. Stay healthy and safe.

Very truly,  
Meg

On Friday, December 17, 2021, 02:02:53 PM EST, Hutt, David C. <dhutt@morrisjames.com> wrote:

Case: 21-3198 Document: 155-3 Page: 31 Date Filed: 02/21/2023

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel

Meghan,

Please see the attached letter with enclosures.

Thanks,

David

**Morris James**

David C. Hutt | Partner  
107 W. Market Street, P.O. Box 690, Georgetown, DE 19947  
19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971  
Phone: 302.856.0018 | Fax: 302.856.7217  
[morrisjames.com](http://morrisjames.com) | [dhutt@morrisjames.com](mailto:dhutt@morrisjames.com)  
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object pages dismiss.pdf  
408.3kB

Case: 21-3198 Document: 155-3 Page: 32 Date Filed: 02/21/2023



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12/18/2021 09:05 AM

Product	Qty	Unit Price	Price
First-Class Mail®	1		\$0.78
Letter			
Wilmington, DE 19801			
Weight: 0 lb 1.60 oz			
Estimated Delivery Date			
Tue 12/21/2021			
Certified Mail®			\$3.75
Tracking #:			
70210350000131665721			
Affixed Postage			-\$1.16
Affixed Amount:			\$1.16
Total			\$3.37
First-Class Mail®	1		\$0.78
Letter			
Wilmington, DE 19801			
Weight: 0 lb 1.60 oz			
Estimated Delivery Date			
Tue 12/21/2021			
Certified Mail®			\$3.75
Tracking #:			
70210350000131665714			
Affixed Postage			-\$1.16
Affixed Amount:			\$1.16
Total			\$3.37
Grand Total:			\$6.74
Cash			\$7.00
Change			-\$0.26

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All Priority Mail Express shipments mailed  
between December 22 and December 25, 2021  
will not be eligible for postage refunds  
unless the package is not delivered  
or an attempt to deliver is not made  
within two delivery days of the date of  
the accepted scan event.

Earn rewards on your business account  
purchases of Priority Mail labels  
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<b>OFFICIAL USE</b>	
Certified Mail Fee \$3.75	
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Extra Services & Fees (check box, add fee if applicable)	
<input type="checkbox"/> Return Receipt (hardcopy) \$10.00	
<input type="checkbox"/> Return Receipt (electronic) \$10.00	
<input type="checkbox"/> Certified Mail Restricted Delivery \$10.00	
<input type="checkbox"/> Adult Signature Required \$10.00	
<input type="checkbox"/> Adult Signature Restricted Delivery \$10.00	
Postmark 12/18/2021	
Postage \$0.78	
Total Postage and Fees \$4.53	
Sent To: 1500 11th Street, Suite 850, A Street and Apt. No., or P.O. Box No. 7000 City, State, ZIP/49201	
PS Form 3800, April 2015 EDS 1230-02 500-3647 See Reverse for Instructions	

7021 0350 0001 3166 5721

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Certified Mail Fee \$3.75	
\$0.00	
Extra Services & Fees (check box, add fee if applicable)	
<input type="checkbox"/> Return Receipt (hardcopy) \$10.00	
<input type="checkbox"/> Return Receipt (electronic) \$10.00	
<input type="checkbox"/> Certified Mail Restricted Delivery \$10.00	
<input type="checkbox"/> Adult Signature Required \$10.00	
<input type="checkbox"/> Adult Signature Restricted Delivery \$10.00	
Postmark 12/18/2021	
Postage \$0.78	
Total Postage and Fees \$4.53	
Sent To: 1500 11th Street, Suite 850, A Street and Apt. No., or P.O. Box No. 7000 City, State, ZIP/49201	
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# Exhibit C

**BOARD ON PROFESSIONAL RESPONSIBILITY  
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**RESPONDENT MEGHAN M. KELLY'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 NOW, Dec. 31, 2021, respondent, Meghan M. Kelly, pro se, files this

Motion simultaneously with her memorandum of law in support of this motion, and hereby objects to and moves this court to enjoin the attendance of health or mental health professionals or alleged experts from reviewing any enclosures or attending any hearing or trial relating to this matter to observe or analyze me to render an expert opinion or expert report to be submitted as part of the record, as violating my religious exercise and beliefs under the First Amendment applicable to the State pursuant to the Fourteenth Amendment, Procedural Due Process and Substantive Due Process Grounds, and, under the Equal Protections Clause, applicable to her as a party of one, including the attendance of John D. Shevoch, MSM, FACHE, FACMPE motivated by disdain by the state towards my exercise of religious belief, speech, petitioning of grievances, association or utter poverty,

and, or, their requirement that I violate my religious beliefs in order to defend my government license to practice law.

1. On or about December 18, 2021, I objected to ineffective service of the Notice of Hearing, objected to the appointment of counsel, and moved the Board to postpone the hearing to allow for discovery so I may have opportunity to gather information to safeguard my protected constitutional exercise from threats to my person and to my license to practice law, but for the state's retaliation against me by bringing this petition for my exercise of First Amendment rights, by sending my objection to the Board via First Class mail, return receipt. (Exhibit 1)

2. On or about December 21, 2021, the Board received the December 18, 2021 filing. (Exhibit 2).

3. On or about December 24, 2021, I received Notice of the hearing dated December 10, 2021, in an envelope post marked December 21, 2021, two weeks after the notice, affording me little opportunity to respond to this urgent matter. (Exhibit 3). I reassert my arguments in Exhibit 2.

4. It is against my religious beliefs to be observed or examined by mental health or health professionals for the purpose of which is to render an expert opinion on my fitness to practice law. (Exhibits 4 affidavit).

5. The State seeks to punish me by declaring me mentally disabled in retaliation for my religious beliefs and exercise of Constitutionally protected

activity, which is quite insulting and poses a great danger to my person, in addition to a substantial burden upon my exercise of Constitutional liberties. "Retaliation by public officials against [my] exercise of First Amendment rights is itself violation of the First Amendment." *Zillich v. Longo*, 34 F.3d 359 (6th Cir. 1994), U.S.C.A. Amend. 1.

6. I have been threatened with physical harm but for my religious, political beliefs. A stranger talked about shooting me based on the stickers on my vehicle reflecting my religious-political beliefs. (Exhibit 5, discusses a threat to my safety, and provides examples of how mental health and physical exams violate my religious beliefs) (Exhibits 6, 7, 8, referred to in Exhibit 5, District Court Complaint which discusses healthcare objections)

7. In April of 2021, an out of state man from Maryland got in my face in BJs, located in Millsboro for his assumption of my political associated beliefs, endangering me to covid 19, during a global pandemic. A young man came to my defense and asked if this man was bothering me. The man walked away. I did not know how this stranger from out of state assumed to know my beliefs or association. I assumed it may be because I drafted proposed articles of impeachment and contacted all 541 federal congress people to support impeachment of former President Trump.

8. Declaring me mentally disabled, as punishment for my religious beliefs and for exercising my freedoms under the First Amendment, would create a substantial burden upon my freedom of speech, from government forced societal peer pressured attacks in the form of official name calling, demeaning my creditability, and diminishing my voice, and exercise of religious beliefs in the community, and preventing me from working, deeming me unfit to be a worker.

9. Declaring me mentally disabled would endanger my life from threats by those who believe people with diverse beliefs or who are declared mentally disabled people are unworthy of life or liberty by such official name calling, during these troubling times as murder and attacks based on religious and political beliefs in America have occurred in the United States in recent years.

10. Just because I do not believe the government established beliefs does not mean I am mentally disabled. None are free, and the Constitutional protection of rights is an illusion if the freedom to think and believe by the dictates of own conscience without government social, economic or physical attacks against our person or property for such exercise, is not respected, but instead is ignored by government agents and partners to bend our will to give into temptations of the state's forced conditioned, controlled will.

11. The Board must not force me to violate my religious beliefs in order to defend my exercise of Fundamental rights, the exercise of which is the subject

of this petition, by allowing a mental health or healthcare professional to observe or examine me to render an expert opinion or expert report to become part of the record.

12. I believe people go to hell for allowing mental health and health experts to diagnose humans like me, as specimens, instead of people capable of reflecting the image of God. I believe our healthcare and mental healthcare causes harm and damnation in hell. I believe more evil is done in healthcare and mental healthcare than any other industry even the military which violates God's commands. I took courses in college and proposed laws to improve care for patients, as opposed to exploiting them for profit. (Exhibit 8). The fact people did not know harm would result, or thought sacrifice of life was worth it does not remove the harm done or damnation in hell on the last day. Not knowing is guilt to God. There is evidence healthcare and mental healthcare harms. Exhibits 9, 10. Just laws that protect patients as opposed to rewarding profits for harmful care is the solution. Money is the problem not the solution. Exhibit 8.

13. The requirement the state must meet to compel me to violate my religious beliefs by allowing an expert to observe or examine me during a hearing to render an expert opinion or report, is strict scrutiny, which the state is not likely to meet. My fundamental rights are more important than any alleged interest the state proffers. There is no 'de minimis' defense to a First Amendment violation."

*Doe v. Indian River School Dist*, 653 F.3d 256, 283 n.14 (3d Cir. 2011) (“*Elrod v. Burns*, 427 U.S. 347, 374, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976) (“The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.”); see also *Schempp*, 374 U.S. at 225, (“[I]t is no defense to urge that the religious practices here may be relatively minor encroachments on the First Amendment.”).

14. Further, I am impoverished. Should any hearing be conducted, though I intend to file a motion to dismiss on lack of subject matter grounds at the conclusion of discovery, which will likely prevent such hearing, I object to having a Court reporter or transcription service for transcribing the hearing. If the hearing is conducting via zoom, there should be a method of recording the Zoom meeting without incurring any fees.

15. I object to any fees relating to transcription and any potential fees relating to experts as against my religion. Going into debt violates my religious beliefs. I believe it damns people to hell. Exhibits 7.

16. I also object to taking off the tape on any computer at a zoom meeting so you can see my face on safety grounds. My safety and privacy on the unsafe internet should not be subjected to threats for the convenience of my attackers or the State or the State’s arms or agents. I object to being examined by any mental health or health expert during discovery.

WHEREFORE, I respectfully request the Board:

1. Enjoin outside mental health and health care professionals from participating at any hearing relating to this matter for the purpose of observing, examining, or rendering an expert opinion or report concerning respondent's fitness to practice law to prevent government compelled violations of respondent's religious exercise and belief in violation of the First Amendment applicable to state agents pursuant to the Fourteenth Amendment.
2. Enjoining John D. Shevoch, MSM, FACHE, FACMPE, a member of the Board of Professional Conduct of the Supreme Court of Delaware from rendering an expert opinion or report to be submitted, separately, as part of the record, and to further enjoin him hereby from discussing this matter with experts in order to gain an expert opinion or report outside of the proceeding to prevent Respondent's opportunity to cross examine, and in violation of the Procedural and Substantive Due Process Clause, and in violation of respondent's protected religious exercise, as a party of one, under the Equal Protections Clause applicable to state government agents pursuant to the Fourteenth Amendment, with no compelling interest more important than safeguarding petitioner's fundamental rights to justify knowingly, willfully violating respondent's freedom from government compelled forced violations of her religious beliefs.

3. Permitting Respondent to keep a cover a device during any hearing to block her image to protect her privacy and safety on the unsecure internet.

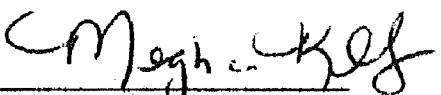
4. Moving the Board to consider recording the hearing without incurring costs, or requiring a transcription, via Zoom or alternatives, and if there is no possibility, the Board will waive transcription fees, or other costs upon indigent respondent as such costs compel her to violate her religious belief, including costs for transcription should she appeal to the Delaware Supreme Court.

5. Moving the Board to waive fees relating to transcription, any potential fees relating to experts, or other fees against petitioner, to prevent compelling her to violate her religious beliefs.

6. Any other relief the Board deems just.

Dated Dec 31, 2021

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  
(Words 1,699 )

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

Dated: Dec. 31, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

**BOARD ON PROFESSIONAL RESPONSIBILITY  
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**MEGHAN M. KELLY'S MEMORANDUM OF LAW IN SUPPORT OF  
HER OBJECTION AND MOTION TO ENJOIN EXPERT OBSERVATION  
AND ANALYSIS OF RESPONDENT AT HEARINGS AND INDISCOVERY  
AND NOTICE SHE WILL MOVE FOR A PROTECTIVE ORDER DURING  
THE DISCOVERY STAGE**

AND NOW, Dec. 31, 21, respondent, Meghan M. Kelly, pro se, filed a Motion contemporaneously with this Memorandum of Law in support of the Motion and hereby objects to and seeks to enjoin the attendance of health or mental health professionals or alleged experts from reviewing any enclosures or attending any hearing or trial relating to this matter to observe or analyze me to render an expert opinion or expert report, to be presented separately as part of the record, as violating my religious exercise and beliefs under the First Amendment applicable to the State pursuant to the Fourteenth Amendment, Procedural Due Process and Substantive Due Process Grounds, and, under the Equal Protections Clause, applicable to her as a party of one, including the attendance of John D. Shevoch, MSM, FACHE, FACMPE, motivated by disdain by the state towards my exercise of religious belief, speech, petitioning of grievances, association or utter poverty, and, or, their requirement that I violate my religious beliefs in order to defend my government license to practice law.

**I. STATEMENT OF FACTS:**

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

These executive orders allow money or support to be transferred between government agents and religious organizations. I believe the money or support in the bought, not free union of church and state, is one reason why religious-political attacks seemed to have increased in recent years, including government incited religious-political attacks against me. President Biden's Valentine's Day executive

Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to be bestowed to religious organizations, like churches in other countries, to perform government business under the guise of charity. Some things the government through its agents praise as good, I believe are evil and violate my religious beliefs, and cause emotional distress based on my religious belief the establishment of government-religion based on barter or exchange, not freedom, misleads people to harm and possibly hell for worshipping the beast sin, business greed, as Godly.

My exercise of speech in the pleadings based on my religious beliefs, are in issue. I believe the government through its agents violate the teachings of God misleading people to harm and hell by *inter alia* organized charity, partnerships with private entities, required pro bono, forced labor to receive welfare, using military to subdue the free will of others by the forced will of the government, and by rewarding ignorance bad business and business greed by allowing the powerful to delegate their duties, instead of correcting individuals within entities, and by eliminating individual liberties to protect collective interests of entities who have no power to do good. Only individuals may choose to do good by unconditional love. Entities with conformed, conditional interests run on conditional labor and money, and are not capable of doing any good by unconditional love. The

establishment of government-compelled religion forces me to be harmed and I believe damns many to hell for the love of money, merriment and material gain.

The State appears to create a situation that may force me to violate my religious beliefs, per the Notice of a hearing, including a heavily credentialed health care professional as a member of the jury who may possibly render an expert report or opinion, or the Petitioner may seek a mental or health care professional, despite having notice of my objections to healthcare and mental health examinations through observations or otherwise. Due to the severity of violations of my religious beliefs, damnation in hell, in addition to substantially burdening my religious exercise, I am filing this motion to prevent foreseeable harm with regards to compelled violations of my religious belief and damnation in hell. My religious beliefs are not a fairy tale despite the fact some people telling my faith is. One man, a friend, a pagan at my former gym, saw my God as a fairy in the sky. My faith in Jesus is more real than anything or anyone in this world to me.

## II. STATEMENT OF QUESTIONS INVOLVED:

Per the letter by Office of Disciplinary Counsel Patricia B. Swartz to me , dated August 23, 2021:

[Her] Office has reviewed several pleadings [I] have filed in the Court of Chancery and the Supreme Court in connection with this lawsuit Meghan

*Kelly v Donald Trump.* The contents of the documents raise serious concerns as to your mental capacity and fitness to practice law.”

So, the State brings this action because they have concerns relating to my exercise of a fundamental right, petitioning of the court, to safeguard Constitutionally protected activity, my exercised of religious beliefs, and speech and association relation to that exercise from a substantial burden the Presidents caused, in part through enforcement of the above referenced executive orders.

On or about December 17, 2021, I mailed out a letter to the Board and Petitioner requesting postponement of the hearing. The Confirmation of receipt indicated the Board received the notice on December 21, 2021. I continue to respectfully request more time for discovery. On December 24, 2022, I received notice through the US mail for the Hearing scheduled for January 13, 2021. On December 30, 2021, the Delaware Supreme Court made a determination on counsel, permitting me to represent myself in this matter to safeguard my exercise of Constitutionally protected activity.

It is against my religious beliefs to be examined or observed by a health care or mental health care professional to determine my fitness to work, as if they are God. I seek to enjoin observations and examinations by the government to prevent the government from compelling me to violate my faith in Jesus by economic or other pressures, including the potential loss of the ability to buy and sell without

worship of the beast, business greed, the professional aim of marketing instead of rendering true justice by safeguarding individual liberties which would instill more respect in the courts by teaching the people even a peon like me, no wealth, no husband, no kids, no job, is deemed an equal in the eyes of the law to a powerful, well connected, wealthy individual, the President of the United States. The courts have the ability to teach no one is above the law and no one is below the law because the law is not for sale. I do not regret imperfectly trying to the right thing against all odds.

## ARGUMENT PRELIMINARY INJUNCTION

### A. Standard for a Preliminary Injunction

The test for the issuance of a preliminary injunction consists of four factors:

"(1) the likelihood that the plaintiff will prevail on the merits at final hearing; (2) the extent to which the plaintiff is being irreparably harmed by the conduct complained of; (3) the extent to which the defendant will suffer irreparable harm if the preliminary injunction is issued; and (4) [that] the public interest [weighs in favor of granting the injunction]." *Greater Phila. Chamber of Commerce v. City of Phila.*, 949 F.3d 116, 133 (3d Cir. 2020), *Citing, A.T.&T. Co. v. Winback & Conserve Program, Inc.*, 42 F.3d 1421, 1427 (3d Cir. 1994) (internal citations omitted) (quoting *Merch. & Evans, Inc. v. Roosevelt Bldg. Prods.*, 963 F.2d 628, 632–33 (3d Cir. 1992) )

"In First Amendment [issues] the initial burden is flipped. The government bears the burden of proving that the [application of procedural] law is constitutional; thus, the plaintiff "must be deemed likely to prevail" if the

government fails to show the constitutionality of the [law's application as applied]”.” Id.

**1. Irreparable Injury to Respondent and to the Public**

If the Board denies my preliminary restraining order requested herein, Respondent and the citizens of the United States, will suffer irreparable injury 1. In terms of suppression of the fundamental right to freely exercise religious beliefs, or not, without fear of government persecution, or compelled violation of religious beliefs in violation of the First Amendment applicable to the state pursuant to the Fourteenth Amendment, 2. In terms of a license for government agents to create a substantial burden upon respondent's and citizen's right to petition the courts, and right to defend the exercise of petitions against claimants by government agents for the exercise of Constitutionally protected activity, in possible violation of the Due process or substantial due process clauses.

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

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

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

Any interest the state may have is not necessary to meet a compelling interest to force respondent to violate her religious beliefs.

**2. The Merits of Respondent's claims for protection;**

Given the fundamental rights at issue, and the requirement petitioner must prove are in furtherance of a compelling government interest, and the least restrictive means of furthering that compelling government interest that is somehow more important than my freedom to freely exercise my first amendment right to exercise my religious beliefs, I have a high likelihood of success on the merits of my claims.

**3. Whether the harm towards the State outweighs the harm to respondent**

The State has no important interest or necessary interest in allowing an expert to examine or observe me for the purpose of determining whether my active license to practice law should be taken away as retaliation for my exercise of the right to petition, speak, associate and worship. I have not worked as a lawyer in over 6 years. I do not enjoy litigation. I hate it, but I love God, and am willing to do what I hate to uphold my ability to worship God without government incited

threats against me. My family is struggling during this global pandemic and economic down turn. I would like the ability to perform real estate settlements at my old law firm so I can afford to live and help them live. They will likely not hire me back should I be punished for the exercise of fundamental rights.

WHEREFORE, I respectfully request no mental health or healthcare experts be permitted to examine or observe me for the purpose of rendering an expert opinion or report as to my fitness to practice law.

Dated Dec. 31, 21

Respectfully submitted,

Meghan Kelly

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Not acting as attorney advocate  
Bar No. 4968  
(Words 1,922)

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

Meghan Kelly (printed)

Meghan Kelly (signed)

# Exhibit D

**THE SUPREME COURT OF THE STATE OF DELAWARE**  
**BOARD ON PROFESSIONAL RESPONSIBILITY**  
**OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**RESPONDENT MEGHAN M. KELLY'S EMERGENCY OBJECTIONS  
AND EMERGENCY MOTION TO POSTPONE THE HEARING TO  
PREVENT MANIFEST INJUSTICE TO AFFORD HER AN  
OPPORTUNITY TO PERFORM DISCOVERY, POTENTIALLY CALL  
WITNESSES AND PREPARE A DEFENSE FOR THE STATE'S  
ILLEGALLY MOTIVATED PETITION AGAINST HER FOR HER  
EXERCISE OF FUNDAMENTAL RIGHTS, MOTIVATED BY THE  
STATE'S DISDAIN OF HER RELIGIOUS POLITICAL BELIEFS**

AND NOW this 1/11/22, respondent, Meghan M. Kelly, pro se, files emergency objections and emergency Motion with both the Board of Professional Responsibility for the Supreme Court of Delaware (“Board”), and the Delaware Supreme Court (“Court”), (Board and Court, collectively “Court”), simultaneously, to postpone the hearing against me to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state’s illegally motivated petition against her for her exercise of fundamental rights, motivated by the state’s disdain for her religious political beliefs.

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.<sup>1</sup> 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 13<sup>th</sup> 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.<sup>2</sup>

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. 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 active license to work as an attorney, despite notice of my hope to regain a position at my

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<sup>1</sup> (Dec. 29, letter, Exhibit A Part 2).

<sup>2</sup> 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)

former law firm to help my family during this global pandemic and global economic crisis.<sup>3</sup>

I believe the State has also brought a petition against me in violation of the Equal Protections Clause of the Fourteenth Amendment because they demean me, motivated by my class of one, as an indigent Christian with individual, unconforming religious beliefs, as unworthy to exercise other Constitutionally protected activity, not mentioned in its Petition, due to inability to buy or barter worthiness, to exercise fundamental rights compared to the President and others with money, power and connections to trade the ability to exercise rights.

I sought to run for the position of the President of the United States without compromising my religious beliefs in Jesus Christ. I did not know how wicked donations, organized charity, fundraising, organized conditional volunteering, gathering statistics on people for material gain, polls and collection of signatures was until after I ran for office, in 2018. I believe such activity misleads people to harm and hell. While people are free to live and believe by the dictates of their

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<sup>3</sup> *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. My father needs a car. My parents gave me a car because they were ashamed of my ugly car when I ran for office. I no longer have my beloved ugly car. I love my parents more than material things, “moth and rust.” (Mt 6:19-20). I want to give the car back and use my former firm’s company car to perform real estate settlements.

conscience, the Free exercise clause protects my free exercise of conscience to worship by the dictates of my free will, uncompromised, without State interference and retaliation and punishment but for my exercise of religious belief.

The government compelled me to violate my faith in Jesus or waive running for President. I sought to run for Congress, and sought permission from the Democratic party, and the State, through the Board of elections. I was denied permission to exercise the fundamental right for an opportunity to run for office without compromising my belief in Jesus. I filed a lawsuit against the Democrats and the State to compel a waiver, but withdrew it when the pandemic arose. I sought to protect people's lives and health. I filed *Kelly v Trump*, when I realized eternal lives were at stake, my own and others, by the establishment of government religion.

I also filed various petitions, unmentioned by the State to government agents relating to my religious beliefs, which I believe may be an impermissible source of the State's suit against me.

I should be afforded a fair, reasonable opportunity to build a defense, to ascertain the reason for the petition against me. While it is true, only I can defend my belief in Jesus before the State, not an attorney advocate, but the advocate of

the holy spirit **reminding me** of his Word, I still require time and opportunity to defend myself relating to **secular reasons**, gathering the facts to uncover the truth.<sup>4</sup>

The trial against me is scheduled Thursday, Jan 13, 2022, two 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, as applied, and to show the state does not have subject matter jurisdiction against me.

I filed a letter Motion with the Board on December 18, 2021 to postpone discovery to *inter alias* afford me an opportunity to build a defense relating to my exercise of Constitutionally protected activity.<sup>5</sup> I filed the same letter motion with the Board and the Court in a letter dated January 29, 2021, as an attachment.

Additionally, the Board and Court had notice of my desire to file motions prior to a trial-hearing.<sup>6</sup> I should be afforded an opportunity to be heard on motions the Court was noticed I intended to file. The Court must not eliminate my

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<sup>4</sup> (John 14:26, “the Advocate, the Holy Spirit... will teach you all things and will remind you of everything I, [Jesus], have told you.); (Mark 13:11, “But when they arrest you and hand you over, do not worry beforehand what to say. Instead, speak whatever you are given at that time, for it will not be you speaking, but the Holy Spirit.”).

<sup>5</sup> See **Exhibit A**, the attached federal court documents which explains reasons why the Court lacks subject matter jurisdiction. Regardless as to whether the Court had pure motives, concern for my poverty and hunger, reporting my petition concerning attorney dues to the ODC or arms, including DE-Lapp, but for caused the state’s lawsuit against me, incited the interference with my exercise of protected activity, and retaliation against me, for exercising rights.

<sup>6</sup> See Motion for Reconsideration of the Court’s December 13, 2021 Order on appointed Counsel, despite notice of my objections to appointed counsel, and objection on the Board’s failure to provide notice of the Hearing on December 10, 2021. This was served on the Board and Court. (D.I. unavailable)

opportunity to be heard, and defend myself, in violation of the Substantive Due Process Clause, Procedural Due Process Clause, Equal Protections Clause, as applied to me, motivated by state actors' disdain for my religious-associated beliefs manifested in my petitions, speech and protected conduct or their decision that I am not worthy to have Constitutional freedoms based on my poverty, health and my refusal to worship business greed as God or as good.

I followed up with the Board on the status of my motion to postpone the hearing last Thursday, and again on Monday. Instead of providing me with an update, they waited until 01/10/21 to deny my motion, with no order, and demand a hearing be held. This places me in a terrible position of not having an Order to appeal. On 1/10/21, I refiled the 12/18/21 Motion, to prevent any argument it was not received by the Board due to the issues as to representation via their email, served on the state at the time of original service.

On or about 12/10/21, the Board failed to serve me with the Notice of a Hearing filed that day. On or about 12/13/21, the Delaware Supreme Court appointed counsel, despite notice of my objection to counsel based on my religious beliefs.

I objected to the hearing on grounds of not being served proper notice on December 10, 2021, and 2. not being afforded an opportunity to perform discovery to have a fair hearing.

I maintain my above referenced and incorporated by reference objections, and include additional objections on the following grounds.

1. Board's failure to allow me a fair opportunity to gather evidence, perform discovery, and research, under the facts of this case, to perform a defense against the state's claims against me for the exercise of my fundamental rights under the First Amendment applicable to the government under the Fourteenth Amendment, motivated by disdain for my religious beliefs, petitions, speech, affiliation, poverty, association as an attorney or other disparate treatment including perceived health,

2. Object on improper notice of the Notice of Hearing on the date notice was sent,

3. Object because my outstanding motion relating to postponing the hearing has not been answered, preventing an opportunity to be heard, by utter denial.

4. Object because the Court is aware of additional motions I intend to file before a hearing/trial, denying me an opportunity to be heard, by conducting a hearing/trial despite notice I seek the opportunity to be heard on motions prior to a hearing/trial, possibly preventing the need for one.

5. Object on the Board's delay in responding to my motion to postpone the hearing with an email sent, less than 3 days of the date of the hearing after I filed a number of emails concerning this request (Exhibit B),

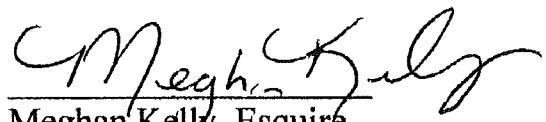
6. I object on procedural and substantive due process and equal protections grounds as applicable to me, a party of one.

7. I object to the decision not to postpone the hearing as unconscionable and creating manifest injustice, under the facts of this case.

Wherefore I pray the Court grants my motion.

Dated Jan. 11, 2022

Respectfully submitted,



Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Not acting as attorney advocate  
Bar No. 4968  
(Word 1954)

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

Dated: 1/11/22

Meghan Kelly (printed)

Meghan Kelly (signed)

## Exhibit B

# Exhibit 1

## Status of motion to postpone hearing/ Motion postpone/Bd 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov  
Cc: meghankellyesq@yahoo.com  
Date: Thursday, January 6, 2022, 11:50 AM EST

Good afternoon,

I am following up on the status of the attached letter, which should be construed as a motion to postpone the hearing scheduled for one week from today, to afford a full and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
4968

## Exhibit 2

## Bd 11537 B / December 18, 2021 Motion

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: supreme\_court\_bprfilings@delaware.gov; karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com; zi-xiang.shen@delaware.gov; lisa.dolph@delaware.gov; david.weiss@usdoj.gov  
Date: Monday, January 10, 2022, 02:03 PM EST

Afternoon your honor,

Please provide me with an order on my motion to postpone the hearing.

You confirmed receipt of my filings without specifying which ones. I am assuming all.

I am re-sending the filing dated December 18, 2021, my letter motion requesting the Board postpone the hearing, objecting to improper service on the date December 10, 2021, and objecting based on the fact I do not have a full and fair opportunity to prepare and conduct discovery for my defense.

You did not reject my document or send it back as unaccepted. I asked whether it was accepted. You indicated my documents were accepted.

If for any reason you argue this motion was not accepted, I am filing it to the E-mail you provided, already sent to opposing counsel via US mail on the original date attached hereto.

Please provide me with an opportunity to appeal to the Delaware Supreme Court, but I require an order first.

I do not think they will accept your email as an order. Albeit if in the interest of justice they do, I would be grateful.

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

Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

 Cert of service mailing Dec letter motion.pdf  
52.2kB

 confirmation of receipt.pdf  
119.5kB

 Dec 18 lttr counsel discovery appeal time.pdf  
207.7kB

 tracking ret rec Dec 18 letter.pdf  
75.3kB

## Exhibit 3

thank you/Dec 18 Letter missing

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: karlis.johnson@delaware.gov  
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com  
Date: Friday, December 24, 2021, 03:05 PM EST

Good afternoon,

Thank you for the letter received today, December 24, 2021.

I am in receipt of the dockets in the mail today. The Delaware Supreme Court did not give appointed Counsel all of the documents.

I am similarly concerned the Board may have accepted the CD I provided with my answers instead of the physical copies. I was not able to upload the documents on the CD completely or correctly with the threat counsel may be appointed before I provided answers.

I will work on scanning the answers to make sure your records reflect the physical documents. It may take me a few hours, and I may have to send them after hours or over the weekend. I also do not have the capacity to scan in large documents.

Should the Delaware Supreme court grant me permission to scan large documents at the law library, I would be grateful. The law library is able to scan about 100 pages at a time.

I saw your docket does not show receipt of my letter requesting postponement of the hearing until after I am afforded an opportunity to perform discovery, and after a determination is made on appointed counsel. I also provided the Board notice of my intent to file a Motion to object to appointed counsel, which you are in receipt of, in the attached December 18, 2021 letter.

The attached post office records indicate both you and Petitioner received the attached letter and certificate of service. It is likely you did not review the mail before you sent out the docket.

Thank you for providing the docket. I also received the Notice of the Hearing, dated December 10, 2021, in an envelope dated December 21, 2021, received today December 24, 2021.

You are now 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.

I see the members have enclosures. I would like a copy of the enclosures they received emailed to petitioner and me. I understand that I may have to file a formal request. Given incomplete filings were given to David Hutt, I would like to confirm the record is complete.

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.

I also 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.

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

Have a safe and healthy day.

Very truly,  
Meghan Kelly  
No 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

-  tracking ret rec Dec 18 letter.pdf  
75.3kB
-  Cert of service mailing Dec letter motion.pdf  
52.2kB
-  Dec 18 lttr counsel discovery appeal time.pdf  
207.7kB
-  confirmation of receipt.pdf  
119.5kB
-  Rec Dec 24 Notice of hearing w envelop.pdf  
113kB

## Exhibit 4

Automatic reply: thank you/Dec 18 Letter missing

From: Johnson, Karlis P (Courts) (karlis.johnson@delaware.gov)

To: meghankellyesq@yahoo.com

Date: Friday, December 24, 2021, 03:06 PM EST

I am out of the office and will return on Tuesday, December 28th.

## Exhibit 5

RE: Postponed hearing/maintaining objections/ Bd 1157B

From: Johnson, Karlis P (Courts) (karlis.johnson@delaware.gov)  
To: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov  
Date: Monday, January 10, 2022, 12:31 PM EST

Ms. Kelly,

The Board plans to move forward with the virtual hearing as scheduled. A Zoom link will be sent via email later this week.

**From:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Sent:** Monday, January 10, 2022 11:42 AM  
**To:** Johnson, Karlis P (Courts) <[karlis.johnson@delaware.gov](mailto:karlis.johnson@delaware.gov)>; Schwartz, Patricia (Courts) <[Patricia.Schwartz@delaware.gov](mailto:Patricia.Schwartz@delaware.gov)>  
**Cc:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Subject:** Postponed hearing/maintaining objections/ Bd 1157B

Hello,

Last Thursday I checked on the status of the hearing, maintaining my objection due to improper service, and required time to perform discovery to show 1. the state does not have subject matter jurisdiction, and 2. the proceeding is illegal as applied to me, motivated to punish me for Constitutionally protected activity.

I have not heard back from the Board or opposing counsel on the status.

The Board confirmed receipt of documents. I received no notice my December 18, 2021, letter was rejected or returned by the Board.

Please confirm the hearing will be postponed. I also would like to set aside time to have the vulture expert from the federal government come too.

I hope both of you and your loved ones are well. I am concerned sickness may be the reason for the delay in response.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Drive

Dagsboro, DE 19939

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

Acting as party not attorney advocate on behalf of another

## Exhibit 6

Fw: Vulture problem/Federal government is helping/ Bd 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov; lisa.dolph@delaware.gov; karlis.johnson@delaware.gov

Bcc: meghankellyesq@yahoo.com

Date: Thursday, January 6, 2022, 12:50 PM EST

Good afternoon,

Per the message below, the government is helping me to prevent the buzzards and vultures from attacking my person. I am grateful.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr

Dagbsoro, DE 19939

meghankellyesq@yahoo.com

4968

----- Forwarded Message -----

**From:** Michaels, Trevor A - APHIS <trevor.a.michaels@usda.gov>

**To:** meghankellyesq@yahoo.com <meghankellyesq@yahoo.com>

**Sent:** Thursday, January 6, 2022, 12:00:07 PM EST

**Subject:** Vulture problem

Good morning,

Your name and email was forwarded to us by DNREC in regards to vulture issues. We would be happy to assist with the issue if possible. It sounds like the use of a loaner laser or pyrotechnics (by one of our staff) may be the best course of action depending on the site layout. Would it be permissible to send someone out for a site visit to assist? If so, is there a day/time that would work best? Thank you,

Trevor Michaels

District Supervisor APHIS MD/DE/DC Wildlife Services

Chesapeake Bay Nutria Eradication Project

2145 Key Wallace Dr.

Cambridge, MD 21613

Office: 443-225-7430

Cell: 443-205-2726

Trevor.a.michaels@usda.gov

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## Exhibit 7

thank you/Dec 18 Letter missing

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: karlis.johnson@delaware.gov  
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com  
Date: Friday, December 24, 2021, 03:05 PM EST

Good afternoon,

Thank you for the letter received today, December 24, 2021.

I am in receipt of the dockets in the mail today. The Delaware Supreme Court did not give appointed Counsel all of the documents.

I am similarly concerned the Board may have accepted the CD I provided with my answers instead of the physical copies. I was not able to upload the documents on the CD completely or correctly with the threat counsel may be appointed before I provided answers.

I will work on scanning the answers to make sure your records reflect the physical documents. It may take me a few hours, and I may have to send them after hours or over the weekend. I also do not have the capacity to scan in large documents.

Should the Delaware Supreme court grant me permission to scan large documents at the law library, I would be grateful. The law library is able to scan about 100 pages at a time.

I saw your docket does not show receipt of my letter requesting postponement of the hearing until after I am afforded an opportunity to perform discovery, and after a determination is made on appointed counsel. I also provided the Board notice of my intent to file a Motion to object to appointed counsel, which you are in receipt of, in the attached December 18, 2021 letter.

The attached post office records indicate both you and Petitioner received the attached letter and certificate of service. It is likely you did not review the mail before you sent out the docket.

Thank you for providing the docket. I also received the Notice of the Hearing, dated December 10, 2021, in an envelope dated December 21, 2021, received today December 24, 2021.

You are now 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.

I see the members have enclosures. I would like a copy of the enclosures they received emailed to petitioner and me. I understand that I may have to file a formal request. Given incomplete filings were given to David Hutt, I would like to confirm the record is complete.

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.

I also 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.

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

Have a safe and healthy day.

Very truly,  
Meghan Kelly  
No 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

-  tracking ret rec Dec 18 letter.pdf  
75.3kB
-  Cert of service mailing Dec letter motion.pdf  
52.2kB
-  Dec 18 ltrr counsel discovery appeal time.pdf  
207.7kB
-  confirmation of receipt.pdf  
119.5kB
-  Rec Dec 24 Notice of hearing w envelop.pdf  
113kB

## Exhibit 8

No counsel Fw: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: lisa.dolph@delaware.gov  
Cc: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov  
Date: Wednesday, December 22, 2021, 05:48 PM EST

Hi Lisa,

I think you mistakenly thought I was represented by counsel. Per the attached, sent to you via mail, and the below email David Hutt agreed to respect my wishes.

In light of this, please put the motion on record, should any issues arise. Please note, the attached letter indicates briefing may not be required. It is seemingly moot but should be on the record.

Thank you,  
Meg

----- Forwarded Message -----

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** David C. Hutt <dhutt@morrisjames.com>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>; Chris Calio <chris.calio@yahoo.com>; Chris Johnson <christopher.johnson@gmail.com>; Darin McCann <darin.mccann@coastalpoint.com>; Matthew <matthewkosiorek@comcast.net>; Glenn Rolphe <grolphe@newszap.com>; Cris Barrish <cbarrish@whyy.org>; Liz Sillick <sillickliz@gmail.com>; Ike Adams <iadams@sidley.com>; E. Mark Braden Esq. <mbraden@bakerlaw.com>; Tim Mastrogiacomo <tmastro@gmail.com>; Aggie Kelly <aggiekelly@comcast.net>; dad <coachkellyirhs@yahoo.com>; Mary Kelly <mbkpadef@yahoo.com>; Mary Mastrogiacomo <marykmastro@gmail.com>; Cris Barrish <cbarrish@comcast.net>; Andy <candykelly@diveltoflood.com>; Amanda Gordines <mandygordines@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>; Mckayla Braden <mckayla.braden@gmail.com>; Greg Layton <misillionink@gmail.com>; Jeff Day <jday1632@gmail.com>; Chris Coons <andrew\_crawford@judiciary-dem.senate.gov>; christie.mcdonnell@mcdonnelllawfirm.com <christie.mcdonnell@mcdonnelllawfirm.com>

**Sent:** Wednesday, December 22, 2021, 10:23:16 AM EST

**Subject:** Fw: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

You are fired. I declined your representation. My poverty and my belief in Jesus Christ does not make me disabled. I already declined your representation. I am copying people for my safety.

----- Forwarded Message -----

**From:** Hutt, David C. <dhutt@morrisjames.com>  
**To:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Wednesday, December 22, 2021, 09:11:27 AM EST  
**Subject:** RE: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Meg,

I do not believe that a person appointed by the Court in an ODC matter is required to also file an entry an appearance on behalf of the person they represent. The Court appointed them so there would be no need to also enter an appearance on behalf of the person being represented.

I reviewed your recent submissions to the Supreme Court.

I continue to believe that you would benefit from being represented by counsel in these proceedings. While I understand your position and strategy on the merits of this matter, I think there are additional or other strategies that you should consider or explore that may benefit you as you seek to maintain your license to practice law. I am happy to undertake those discussions with you.

That said, if your position remains that you would like to submit your motion requesting to remove me as your counsel, then I will do so.

I caution you in two respects and offer a further word of advice.

First, there is an age old adage, that he who represents himself has a fool for a client. Adages are what they are, but there is often at least a bit of wisdom in them.

Second, I'm not sure you can decline representation because, as I indicated previously, the declination of representation assumes that the person declining representation has the capacity to make a knowing, voluntary and informed decision.

Finally, if you haven't done so already, please consider speaking with a pastor, spiritual advisor or other counselor about your present course. It is always a good idea to consult with others and find out their thoughts on your view of defending oneself in a Court-like proceeding. I know several such pastors and advisors and would be happy to put you in contact with one of them.

Thanks,

David

**From:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Sent:** Tuesday, December 21, 2021 8:42 PM  
**To:** Hutt, David C. <[DHutt@morrisjames.com](mailto:DHutt@morrisjames.com)>  
**Cc:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Subject:** Re: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

David,

I declined your representation. You are fired in this matter, through no fault of your own.

They have not received the attached letter where I declined your services.

I need a docket of the Board matter. I have a right to the docket and need it for my lawsuit to enjoin the proceeding in federal court. I contacted the Board and made a request via email yesterday.

Do not make an appearance. What action if any have you taken in this case that I may not be aware of?

Thank you.

Meg

On Tuesday, December 21, 2021, 06:11:54 PM EST, Hutt, David C. <[dhutt@morrisjames.com](mailto:dhutt@morrisjames.com)> wrote:

Meg,

Please see the email below and attached letters that I received from the Clerk of the Supreme Court this afternoon.

You will see that the Court rejected the document filed on Monday with the explanation set forth in the attached letter.

As you know, I am still relatively new to this matter and am working through the documents given to me by the Supreme Court, which appear to be ODC's Complaint and your Answer.

When I complete that review, I will let you know my thoughts on the best response and defenses.

Thanks,

David

# Morris James LLP

**David C. Hult | Partner**  
107 W. Market Street, P.O. Box 690, Georgetown, DE 19947  
19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971  
**Phone:** 302.856.0018 | **Fax:** 302.856.7217  
[morrisjames.com](http://morrisjames.com) | [dhult@morrisjames.com](mailto:dhult@morrisjames.com)

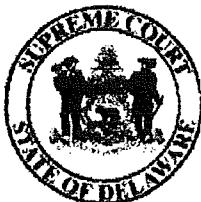
[Facebook](#) | [LinkedIn](#) | [Twitter](#)

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**From:** Dolph, Lisa (Courts) <[Lisa.Dolph@delaware.gov](mailto:Lisa.Dolph@delaware.gov)>  
**Sent:** Tuesday, December 21, 2021 1:59 PM  
**To:** Hult, David C. <[DHult@morrisjames.com](mailto:DHult@morrisjames.com)>; Schwartz, Patricia (Courts) <[Patricia.Schwartz@delaware.gov](mailto:Patricia.Schwartz@delaware.gov)>  
**Subject:** In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Good afternoon. Please see the attached. Thank you.

**Lisa A. Dolph**  
**Clerk of Supreme Court**  
**55 The Green**  
**Dover, DE 19901**  
**(302) 739-4187**



Cert of serv sent Dec 21.pdf

38.5kB

Letter representation rejected.pdf

105kB

## Exhibit 9

Fw: Board 1153270/Docket/permission to email/In the Matter of Meghan Kelly

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: lisa.dolph@delaware.gov  
Cc: meghankellyesq@yahoo.com  
Date: Wednesday, December 22, 2021, 05:15 PM EST

Hi Lisa,

May I please have Karlis Johnson's email? I do not think Mason is the correct person, and I do not think she will respond to my response for the docket. Mark Vavala gave me her email, but she works for the ODC, not the Board of PR as an administrator or clerk like you. I think Karlis is the correct person.

Thank you for your help noting the urgency of this matter.

Thank you,  
Meg

----- Forwarded Message -----

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** kjohnson@state.de.us <kjohnson@state.de.us>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Wednesday, December 22, 2021, 05:09:24 PM EST  
**Subject:** Board 1153270/Docket/permission to email/In the Matter of Meghan Kelly

Good evening,

May I please have the docket for Board Case 115327-B emailed to me? Please be advised I am not represented by counsel.

May I please email you filings? I have been using the post office. It may be easier for staff who work remotely if I scan them when able.

Thank you. Have a good night.

Very truly,  
Meg Kelly

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# Exhibit E

**THE SUPREME COURT OF THE STATE OF DELAWARE**  
**BOARD ON PROFESSIONAL RESPONSIBILITY**  
**OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**RESPONDENT'S MOTION APPEALING ORDER  
OF THE BOARD ON PROFESSIONAL RESPONSIBILITY  
OF THE SUPREME COURT OF THE STATE OF DELAWARE DATED  
JANUARY 11, 2022,**

**GRANTING POSTPONEMENT OF HEARING FOR 8 DAYS  
DUE TO ILLNESS, NOT A REASON IDENTIFIED IN MY MOTION TO  
GRANT POSTPONEMENT TO AFFORD ME OPPORTUNITY TO  
PREPARE A DEFENSE, PERFORM DISCOVERY, RESEARCH, FILE  
MOTIONS, BE HEARD ON OUTSTANDING MOTION(S)  
UNADDRESSED BY THE BOARD, TO DEFEND MY EXERCISE OF  
FUNDAMENTAL RIGHTS AND TO PRESERVE MY LICENSE TO  
PRACTICE LAW, ON THE GROUNDS THE AMOUNT OF TIME IS NOT  
ENOUGH AND A HEARING DATE SHOULD BE POSTPONED UNTIL  
AFTER A FAIR OPPORTUNITY TO BUILD A DEFENSE IS GRANTED**

AND NOW this 1/12/22, respondent, Meghan M. Kelly, pro se, pursuant to the Substantive and Procedural Due Process Clause and the Equal Protections Clause applicable to the state pursuant to the 14<sup>th</sup> Amend., and the 1st Amend. applicable to the state pursuant to the 14<sup>th</sup> Amend., appeals to 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.

1. On January 10, 2022, I filed a Motion *Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against 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*, incorporated herein by reference. (Ex. A)

2. On January 10, 2022, The Delaware Supreme Court kindly, swiftly granted an order denying relief based on jurisdiction. (Ex. B).

3. While I am grateful for the swift determination of this Court, I am insulted and 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." (Ex. A). It appears my life and liberty are at stake in this case, with the reference of a different proceeding conducted in the same manner as this disciplinary proceeding. 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.

4. On 1/10/22, the Board granted an order postponing the hearing for eight days due to alleged illness, a reason not included in my motion. (Ex. B)

5. The Board was aware I was not feeling well when I immediately notified them, I was sick. On 1/5/22, I emailed Patricia Swartz ("ODC") to apprise her I felt sick during a global pandemic to prevent contagion. (Ex. D, Ex J). I Emailed the Board and ODC on 1/6/22, notifying them

1. I was getting worse,
2. was getting attacked by vultures, which the federal government is not agreeing to help me with,

3. and to lament on the fact I applied for a government sponsored phone which accepted money for a service it did not provide. (Ex. E, Ex. K) These 3 issues may interfere with the scheduling and ease of the proceeding.).

6. Despite having knowledge, I have been under the weather, needed time to file to perform discovery, and prepare a defense, 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 last week's status update requests, or the Dec. 2021 status of receipt and update requests. They 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. F, Ex. L)

7. 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. G, H, I, L, M).

8. Illness was not a reason I included in my motion. I have a duty to look after the health and lives of my opponents, with love, during a pandemic too. I do not want the ODC to get sick or die, should I fall ill. (Ex J)

9. I want the ODC to have softer hearts of love, not acting as cold hearted machines going through the motions, without true power to render justice with mercy to correct, to prevent harm and condemnation, as only individual people may choose to do beyond the letter of the law, written on their hearts, so she may have eternal life. *Jeremiah 31.*

10. I think there is a plan to increasingly automate the law, especially real estate, to reduce the power of individual justices, to possibly eliminate judges' governing and guiding authority down the line. Judges are more powerful than the court and are what holds the court together, not money.

11. Judges are special in that they have the power to reflect the image of God by unconditional love by their independent thinking and choice. Machines cannot do that. The judges must not be conformed, controlled, conditioned by the dependent thoughts of others within the two branches. They must remain impartial

in order to place checks on the other two branches should they overstep Constitutional authority. Judges are powerful, not powerless.

8. One asserted reason for time for discovery was to investigate whether my exercise of Constitutionally protective activity, running for office, filing a law suit to run for office without compelled violations of my religious beliefs by asking for signatures and money to pay for the right, no longer free, is an impermissible reason for the State's petition against me.

9. Another reason is to investigate, and gather facts as to this court's participation in interference and retaliation against me, but for my exercise of Constitutional rights to present a motion on subject matter grounds. I seek to protect the integrity of the Court

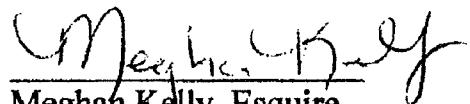
10. I must be granted an opportunity to gather facts, research and present evidence for a defense against me to protect my life and liberty, against state punishment for the exercise of First Amendment rights.

11. I also respectfully request the Court immediately, or urgently respond to this motion, so opportunity to notify the ODC and the Board prior to the January 21, 2022 hearing is allowed.

Wherefore I pray the Court grants this motion.

Dated Jan. 12, 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 Count 1, 258)

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

Dated: January 12, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

## Exhibit A

**THE SUPREME COURT OF THE STATE OF DELAWARE**  
**BOARD ON PROFESSIONAL RESPONSIBILITY**  
**OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**RESPONDENT MEGHAN M. KELLY'S EMERGENCY OBJECTIONS  
AND EMERGENCY MOTION TO POSTPONE THE HEARING TO  
PREVENT MANIFEST INJUSTICE TO AFFORD HER AN  
OPPORTUNITY TO PERFORM DISCOVERY, POTENTIALLY CALL  
WITNESSES AND PREPARE A DEFENSE FOR THE STATE'S  
ILLEGALLY MOTIVATED PETITION AGAINST HER FOR HER  
EXERCISE OF FUNDAMENTAL RIGHTS, MOTIVATED BY THE  
STATE'S DISDAIN OF HER RELIGIOUS POLITICAL BELIEFS**

AND NOW this 1/11/22, respondent, Meghan M. Kelly, pro se, files  
emergency objections and emergency Motion with both the Board of Professional  
Responsibility for the Supreme Court of Delaware ("Board"), and the Delaware  
Supreme Court ("Court"), (Board and Court, collectively "Court"), simultaneously,  
to postpone the hearing against me to prevent manifest injustice to afford her an  
opportunity to perform discovery, potentially call witnesses and prepare a defense  
for the state's illegally motivated petition against her for her exercise of  
fundamental rights, motivated by the state's disdain for her religious political  
beliefs.

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.<sup>1</sup> 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 13<sup>th</sup> 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.<sup>2</sup>

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. 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 active license to work as an attorney, despite notice of my hope to regain a position at my

---

<sup>1</sup> (Dec. 29, letter, Exhibit A Part 2).

<sup>2</sup> 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)

former law firm to help my family during this global pandemic and global economic crisis.<sup>3</sup>

I believe the State has also brought a petition against me in violation of the Equal Protections Clause of the Fourteenth Amendment because they demean me, motivated by my class of one, as an indigent Christian with individual, unconforming religious beliefs, as unworthy to exercise other Constitutionally protected activity, not mentioned in its Petition, due to inability to buy or barter worthiness, to exercise fundamental rights compared to the President and others with money, power and connections to trade the ability to exercise rights.

I sought to run for the position of the President of the United States without compromising my religious beliefs in Jesus Christ. I did not know how wicked donations, organized charity, fundraising, organized conditional volunteering, gathering statistics on people for material gain, polls and collection of signatures was until after I ran for office, in 2018. I believe such activity misleads people to harm and hell. While people are free to live and believe by the dictates of their

---

<sup>3</sup> 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. My father needs a car. My parents gave me a car because they were ashamed of my ugly car when I ran for office. I no longer have my beloved ugly car. I love my parents more than material things, “moth and rust.” (Mt 6:19-20). I want to give the car back and use my former firm’s company car to perform real estate settlements.

conscience, the Free exercise clause protects my free exercise of conscience to worship by the dictates of my free will, uncompromised, without State interference and retaliation and punishment but for my exercise of religious belief.

The government compelled me to violate my faith in Jesus or waive running for President. I sought to run for Congress, and sought permission from the Democratic party, and the State, through the Board of elections. I was denied permission to exercise the fundamental right for an opportunity to run for office without compromising my belief in Jesus. I filed a lawsuit against the Democrats and the State to compel a waiver, but withdrew it when the pandemic arose. I sought to protect people's lives and health. I filed *Kelly v Trump*, when I realized eternal lives were at stake, my own and others, by the establishment of government religion.

I also filed various petitions, unmentioned by the State to government agents relating to my religious beliefs, which I believe may be an impermissible source of the State's suit against me.

I should be afforded a fair, reasonable opportunity to build a defense, to ascertain the reason for the petition against me. While it is true, only I can defend my belief in Jesus before the State, not an attorney advocate, but the advocate of

the holy spirit reminding me of his Word, I still require time and opportunity to defend myself relating to **secular reasons**, gathering the facts to uncover the truth.<sup>4</sup>

The trial against me is scheduled Thursday, Jan 13, 2022, two 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, as applied, and to show the state does not have subject matter jurisdiction against me.

I filed a letter Motion with the Board on December 18, 2021 to postpone discovery to *inter alias* afford me an opportunity to build a defense relating to my exercise of Constitutionally protected activity.<sup>5</sup> I filed the same letter motion with the Board and the Court in a letter dated January 29, 2021, as an attachment.

Additionally, the Board and Court had notice of my desire to file motions prior to a trial-hearing.<sup>6</sup> I should be afforded an opportunity to be heard on motions the Court was noticed I intended to file. The Court must not eliminate my

---

<sup>4</sup> (John 14:26, “the Advocate, the Holy Spirit... will teach you all things and will remind you of everything I, [Jesus], have told you.); (Mark 13:11, “But when they arrest you and hand you over, do not worry beforehand what to say. Instead, speak whatever you are given at that time, for it will not be you speaking, but the Holy Spirit.”).

<sup>5</sup> See **Exhibit A**, the attached federal court documents which explains reasons why the Court lacks subject matter jurisdiction. Regardless as to whether the Court had pure motives, concern for my poverty and hunger, reporting my petition concerning attorney dues to the ODC or arms, including DE-Lapp, but for caused the state’s lawsuit against me, incited the interference with my exercise of protected activity, and retaliation against me, for exercising rights.

<sup>6</sup> See Motion for Reconsideration of the Court’s December 13, 2021 Order on appointed Counsel, despite notice of my objections to appointed counsel, and objection on the Board’s failure to provide notice of the Hearing on December 10, 2021. This was served on the Board and Court. (D.I. unavailable)

opportunity to be heard, and defend myself, in violation of the Substantive Due Process Clause, Procedural Due Process Clause, Equal Protections Clause, as applied to me, motivated by state actors' disdain for my religious-associated beliefs manifested in my petitions, speech and protected conduct or their decision that I am not worthy to have Constitutional freedoms based on my poverty, health and my refusal to worship business greed as God or as good.

I followed up with the Board on the status of my motion to postpone the hearing last Thursday, and again on Monday. Instead of providing me with an update, they waited until 01/10/21 to deny my motion, with no order, and demand a hearing be held. This places me in a terrible position of not having an Order to appeal. On 1/10/21, I refiled the 12/18/21 Motion, to prevent any argument it was not received by the Board due to the issues as to representation via their email, served on the state at the time of original service.

On or about 12/10/21, the Board failed to serve me with the Notice of a Hearing filed that day. On or about 12/13/21, the Delaware Supreme Court appointed counsel, despite notice of my objection to counsel based on my religious beliefs.

I objected to the hearing on grounds of not being served proper notice on December 10, 2021, and 2. not being afforded an opportunity to perform discovery to have a fair hearing.

I maintain my above referenced and incorporated by reference objections, and include additional objections on the following grounds.

1. Board's failure to allow me a fair opportunity to gather evidence, perform discovery, and research, under the facts of this case, to perform a defense against the state's claims against me for the exercise of my fundamental rights under the First Amendment applicable to the government under the Fourteenth Amendment, motivated by disdain for my religious beliefs, petitions, speech, affiliation, poverty, association as an attorney or other disparate treatment including perceived health,

2. Object on improper notice of the Notice of Hearing on the date notice was sent,

3. Object because my outstanding motion relating to postponing the hearing has not been answered, preventing an opportunity to be heard, by utter denial.

4. Object because the Court is aware of additional motions I intend to file before a hearing/trial, denying me an opportunity to be heard, by conducting a hearing/trial despite notice I seek the opportunity to be heard on motions prior to a hearing/trial, possibly preventing the need for one.

5. Object on the Board's delay in responding to my motion to postpone the hearing with an email sent, less than 3 days of the date of the hearing after I filed a number of emails concerning this request (Exhibit B),

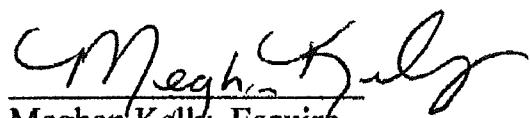
6. I object on procedural and substantive due process and equal protections grounds as applicable to me, a party of one.

7. I object to the decision not to postpone the hearing as unconscionable and creating manifest injustice, under the facts of this case.

Wherefore I pray the Court grants my motion.

Dated Jan. 11, 2022

Respectfully submitted,



Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Not acting as attorney advocate  
Bar No. 4968  
(Word 1954)

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

Dated: 1/11/22

Meghan Kelly (printed)

Meghan Kelly (signed)

## Exhibit B

IN THE SUPREME COURT OF THE STATE OF DELAWARE

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

Submitted: January 11, 2022  
Decided: January 11, 2022

Before **SEITZ**, Chief Justice; **VALIHURA** and **MONTGOMERY-REEVES**,  
Justices.

*PER CURIAM*

**ORDER**

Upon careful consideration of the emergency objections and emergency motion to postpone the hearing (“the Motion”) filed by Respondent in this Court,<sup>1</sup> the Motion is denied. Respondent is the subject of an ongoing proceeding in the Board on Professional Responsibility. The hearing panel chair assigned to Respondent’s matter decides “scheduling, administrative, procedural, and evidentiary matters.”<sup>2</sup> The decisions of the panel chair or panel may not be appealed before submission of the panel’s final report and recommendation to this Court.<sup>3</sup> When the panel submits its final report and recommendation to the Court

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<sup>1</sup> Respondent also filed the Motion in the Board on Professional Responsibility.

<sup>2</sup> Del. Lawyers’ R. Disciplinary Proc. 2(c). Procedures and hearings for proceedings to determine incapacity are conducted in the same manner as disciplinary proceedings. *Id.* 19(c).

<sup>3</sup> *Id.* 9(e); 19(c).

for review, Respondent will have the opportunity to object to the report and recommendations as well as prior rulings of the panel chair.<sup>4</sup>

IT IS SO ORDERED.

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<sup>4</sup> *Id.* 9(e).

## Exhibit C

**BOARD ON PROFESSIONAL RESPONSIBILITY  
OF THE SUPREME COURT OF DELAWARE**

IN THE MATTER OF A  
MEMBER OF THE BAR OF  
THE SUPREME COURT OF  
DELAWARE

MEGHAN M. KELLY,  
RESPONDENT.

§  
§  
§  
§  
§  
§  
§  
§

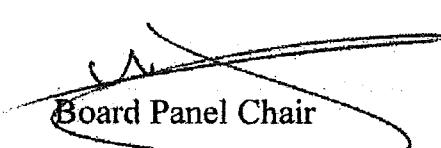
**CONFIDENTIAL**

Board Case No. 115327-B

**ORDER ON REQUEST TO POSTPONE HEARING**

This 11<sup>th</sup> day of January 2022, upon consideration of the Respondent's request to postpone the Hearing scheduled for Thursday, January 13, 2022, due to illness:

IT IS SO ORDERED that the request for postponement is GRANTED and the hearing is rescheduled for Friday, January 21, 2022, at 9:30 a.m. via Zoom.

  
Board Panel Chair

## Exhibit D

Bd 11537 Touching base/covid free/but under the weather looks like shingles

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Monday, January 3, 2022, 06:10 PM EST

Good evening,

I am not feeling so well. I took a covid test an hour ago, and it indicates I am covid free, but I wanted to let you know in case I take a downturn.

I had shingles when my grandmom Cecelia Batten died, and I think I may be developing the same thing now. It looks the same on my leg.

It was today January 3, 2021, I experienced symptoms. I am going to keep taking tests just in case.

Thank you. Have a good night.

Very truly,  
Meg

## Exhibit E

Bd 11537 B/phone/Meg is getting a little worse/Fw: Vulture and buzzards are attacking me/Please help/ a weak peon

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: patricia.schwartz@delaware.gov; lisa.dolph@delaware.gov; karlis.johnson@delaware.gov  
Cc: meghankellyesq@yahoo.com  
Date: Wednesday, January 5, 2022, 08:40 AM EST

Good morning,

I am feeling worse today. I am losing my voice, very dehydrated, and am experiencing more unpleasant symptoms. Per the message and pictures below, it appears I smell like death. I have been getting attacked by buzzards and I am seeking the state's help.

Should anything happen to me, and I am unable to get back to you I apologize.

Thank you for your understanding during this global pandemic and time of uncertainty.

On an aside, I applied for a free phone through the government's program. I was provided a phone that doesn't work. I attempted for months to get it fixed, as witnessed by the law librarian. I used her phone to call the providers.

The phone provider took government money without providing a working phone or service for months. They misled me to believe a working phone would be sent to me. No working phone came. They sent a letter indicating they will cut off service which they never provided me if I do not make one call by January 19, 2022. It appears, when I talked with them on the phone at the law library and made test calls from the broken phone, that still allowed them to make a month's worth of money without providing a service for months, so long as I continued to try to fix the phone. It did not matter that no test call went through. I am learning how poor people are exploited under the guise of aide through government private partnerships, by applying for programs for the poor. The government partners are difficult to correct since the government colludes by supporting funding to the private partners instead of governing and guiding private entities. Thus, the government backs private partners through pay, making their hands too dirty to clean private entities' hands.

I apologize for not being accessible by phone at this time. Thank you.

Very truly,  
Meg  
Meghan Kell

----- Forwarded Message -----

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** Christopher.Wade@delaware.gov <christopher.wade@delaware.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>; david.saveikis@delaware.gov <david.saveikis@delaware.gov>; anthony.gonzon@delaware.gov <anthony.gonzon@delaware.gov>; Glenn Rolphe <grolphe@newszap.com>; Darin McCann <darin.mccann@coastalpoint.com>; Cris Barrish <cbarrish@whyy.org>  
**Sent:** Wednesday, January 5, 2022, 08:12:27 AM EST  
**Subject:** Vulture and buzzards are attacking me/Please help/ a weak peon

Hi Chris Wade,

Thank you for previously helped me regarding murder hornets. Can you please help me with the buzzards and vultures attacking me, and whooping at my head, and banging on the windows?

I do not have a phone and am unable to call animal control. I understand they buzzards are protected. I hope you value humans as even more valuable and in need of protection.

The turkey vultures smell Sulphur. I had a surgery in my youth which makes my menstruation difficult, making me smell like death. I always lose 5 pounds of water weight and become weaker and even have fainted should I not drink additional water during my period. I have my period now. They smell Sulphur. It is pretty humbling to tell you I smell like death.

The birds were setting me up knocking on the door, banging on the glass, while 50 now 100s of the different kind of buzzards, (the black ones without the red heads, the ones with the clawed feet), have been surrounding trees around the house. They have been watching me for some time before they made attacks, swooping in on me, with quick escapes. I almost didn't make it. The claws were so close, It is creepy, one sliced a screen at a window.

The black buzzards sometimes attack weak prey like me. It appears they go for eye balls and tongues and buttocks of weak prey. They twice chased me to go into my car, ten feet above my head.

It was about two or three different days I caught them banging at the windows. They are so big and scary and are growing in numbers. I am scrawny 110 pounds. I am not strong.

Will you please help me, or provide an email of the correct person to contact with the government? Please do not provide emails of private entities or government partners.

On an aside, I am losing my voice, and prefer not to come out, as I am not feeling so well. I do not have covid, but I think I have the shingles. I tested myself for covid and have additional test kits.

Thank you,  
Meg

Will you help me please? I understand they are protected species. Since, I am not feeling well, I do not want to come out. I do not have covid, but I think I have the shingles. Sorry.

I live at 34012 Shawnee, Drive Dagsboro, DE 19939

Thank you,  
Meg

 IMG\_1977.JPG  
1.8MB

 IMG\_1979.JPG  
1.9MB

 bad birds.jpg  
450.1kB

 misbehaving misguided birds.jpg  
249.3kB









## Exhibit F

RE: Postponed hearing/maintaining objections/ Bd 1157B

From: Johnson, Karlis P (Courts) (karlis.johnson@delaware.gov)  
To: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov  
Date: Monday, January 10, 2022, 12:31 PM EST

Ms. Kelly,

The Board plans to move forward with the virtual hearing as scheduled. A Zoom link will be sent via email later this week.

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Monday, January 10, 2022 11:42 AM  
**To:** Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov>; Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>  
**Subject:** Postponed hearing/maintaining objections/ Bd 1157B

Hello,

Last Thursday I checked on the status of the hearing, maintaining my objection due to improper service, and required time to perform discovery to show 1. the state does not have subject matter jurisdiction, and 2. the proceeding is illegal as applied to me, motivated to punish me for Constitutionally protected activity.

I have not heard back from the Board or opposing counsel on the status.

The Board confirmed receipt of documents. I received no notice my December 18, 2021, letter was rejected or returned by the Board.

Please confirm the hearing will be postponed. I also would like to set aside time to have the vulture expert from the federal government come too.

I hope both of you and your loved ones are well. I am concerned sickness may be the reason for the delay in response.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Drive

Dagsboro, DE 19939

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

Acting as party not attorney advocate on behalf of another

## Exhibit G

thank you/Dec 18 Letter missing

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: karlis.johnson@delaware.gov  
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com  
Date: Friday, December 24, 2021, 03:05 PM EST

Good afternoon,

Thank you for the letter received today, December 24, 2021.

I am in receipt of the dockets in the mail today. The Delaware Supreme Court did not give appointed Counsel all of the documents.

I am similarly concerned the Board may have accepted the CD I provided with my answers instead of the physical copies. I was not able to upload the documents on the CD completely or correctly with the threat counsel may be appointed before I provided answers.

I will work on scanning the answers to make sure your records reflect the physical documents. It may take me a few hours, and I may have to send them after hours or over the weekend. I also do not have the capacity to scan in large documents.

Should the Delaware Supreme court grant me permission to scan large documents at the law library, I would be grateful. The law library is able to scan about 100 pages at a time.

I saw your docket does not show receipt of my letter requesting postponement of the hearing until after I am afforded an opportunity to perform discovery, and after a determination is made on appointed counsel. I also provided the Board notice of my intent to file a Motion to object to appointed counsel, which you are in receipt of, in the attached December 18, 2021 letter.

The attached post office records indicate both you and Petitioner received the attached letter and certificate of service. It is likely you did not review the mail before you sent out the docket.

Thank you for providing the docket. I also received the Notice of the Hearing, dated December 10, 2021, in an envelope dated December 21, 2021, received today December 24, 2021.

You are now 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.

I see the members have enclosures. I would like a copy of the enclosures they received emailed to petitioner and me. I understand that I may have to file a formal request. Given incomplete filings were given to David Hutt, I would like to confirm the record is complete.

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.

I also 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.

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

Have a safe and healthy day.

Very truly,  
Meghan Kelly  
No 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

-  tracking ret rec Dec 18 letter.pdf  
75.3kB
-  Cert of service mailing Dec letter motion.pdf  
52.2kB
-  Dec 18 lttr counsel discovery appeal time.pdf  
207.7kB
-  confirmation of receipt.pdf  
119.5kB
-  Rec Dec 24 Notice of hearing w envelop.pdf  
113kB

## Exhibit H

Re: (Dec 18 motion outstanding)(Motion already filed )Re: (Patricia's stance) ODC's stance on postponing the hearing Bd 11537B

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: patricia.schwartz@delaware.gov  
Cc: lisa.dolph@delaware.gov; karlis.johnson@delaware.gov; meghankellyesq@yahoo.com  
Date: Tuesday, January 11, 2022, 03:16 PM EST

Patty,

You received my previous motion to postpone the hearing twice before too, as a filing with the Board and attached to a filing with the Court. It is not my fault the Board did not provide a determination, albeit informally until yesterday, with one full day before the hearing today.

I am not sitting on this, but am acting humbly imperfectly, swiftly to protect my life and liberty from compelled forced violations of my religious beliefs or loss of my license. My faith in Jesus is not for sale in exchange for my license to practice law. I should not be penalized by losing the ability to buy and sell as an attorney, but for believing differently than most. The rule of law protects the minority from mob rule. I am allowed to keep myself separate. I am not hurting you by loving Jesus and others more than material gain. God desires mercy not sacrifice. I desire the ability to worship my God without government punishment.

Have a good day.

Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Tuesday, January 11, 2022, 03:02:24 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Patty,

Noted, you object.

You received my more important reasons for postponement via email this morning, served via US Mail this morning, where I had to request a waiver for volume.

My faith in Jesus, my eternal life, is even more important than my life here.

With regards to my health, I do have a sore throat, and fatigue too, but covid tests are negative for now. Should I continue to grow worse, I will let you know.

With regards to the shingles, I think it is healing, beyond the fluid blister, scab like stage.

I am not going to be examined by doctors or going to a hospital during a global pandemic. Going there means sickness and death by contagion, and loss of eternal life.

I would still like copies of the dockets via email from the Board and Court due to the immediate nature of this issue.

Karlis Johnson, may I please have a copy of the documents of the Board sent to me via email as soon as possible?

Thank you.

Regards,  
Meg

Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Tuesday, January 11, 2022, 02:35:25 PM EST, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Kelly

The ODC has not been served with a motion to continue the hearing on Thursday January 13, 2022 based on your medical condition of shingles. Please be advised, the ODC opposes any other motions for a continuance that are not based on your claim of "not feeling well. I am getting over the shingles" as stated in your below email. By copy of this email to Ms. Karlis Johnson, Administrator for the Board, the ODC advises the Board of its opposition to a continuance for any reason other than your current medical condition of shingles.

Patty Schwartz

Patricia Bartley Schwartz  
Office of Disciplinary Counsel  
Supreme Court of Delaware  
405 N. King Street, Suite 420  
Wilmington, DE 19801  
Temporary number 302-668-3467

## Exhibit I

(Motion already filed )Re: (Patricia's stance) ODC's stance on postponing the hearing Bd 11537B

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: patricia.schwartz@delaware.gov  
Cc: lisa.dolph@delaware.gov; karlis.johnson@delaware.gov; meghankellyesq@yahoo.com  
Date: Tuesday, January 11, 2022, 01:41 PM EST

Good afternoon,

Thank you for your response. With regards to your offer, I already filed the motion.

I also object to examination and mistreatment as an object to use for pay by doctors or health professionals on religious grounds.

Our healthcare is terrible. I drafted state and federal healthcare proposals to improve care to care for patients, instead of harming them for profit in 2018.

I believe our healthcare harms instead of heals, causes death and damns people to hell. I even had a sign to improve healthcare when I ran for office. As you see in the Complaint, I sent you where I sued the democrats, they did not want me to run because they opposed my healthcare stance. They wanted more bad care. More is not better when the funding is received in exchange for using patients as lab tests in experiments for profit, not for the patients' good.

I believe people go to hell for serving business greed under the guise of good or love, should they not unharden their heads and hearts. I believe even referring people to businesses or charities that work for conditional purposes serves deception that misleads people to hell by teaching conditionally caring is unconditional love. I believe masking pain, inhibiting people's mental faculties prevents them from using their conscience mind to love God and one another, potentially damning them to hell should they die, exchanging their desire to feel better with the loss of eternal life, exchanging their trust in God with the trust of a fallible person.

One of the leadings causes of death in America is going to the doctors.

Doctors and other experts are rendered above the law. They are rendered to be the law before the courts as judges turn to experts' forced thought and professional standards instead of serving the people by independently thinking as individual judges. I believe judges sin against God by not using their own conscience mind to discern truth.

Individual judges are powerful, not powerless. They have the ability to discern justice beyond the constrains of what is written, what has been done before, and the fickle, ever-changing fads and trends of experts in various industries which serve business greed, not good, to safeguard individual people and individual liberties under the Constitution.

Individuals and their freedoms are not for sale for barter or exchange by the government through government backed partnerships or otherwise.

I see people as the treasure, not money, merriment or material gain, each individual person makes our world richer, each one not replaceable by money or material gain.

It is a greater treasure to share the gift of each individual for eternity. Yet Jesus the Christ teaches most people go to hell. Citing Matthew 7:13-15. Many people try to go to heaven, thinking they will get there, and are mistaken. Citing Luke 13:23-28. Only a mere remnant is saved from destruction. Citing Isaiah 10:22.

I choose to lay down my desires, my will to seek to do God's will, by standing up for my belief Jesus is savior not money, or business. My license to work should not be taken away because I worship God as God, not money as God.

Jesus taught those who worship by conducting business are not welcome in the church or in heaven. Citing John 2:16. He drove those who used God's name to serve business greed out of the temple and scolded them for making his father's house a place of business.

I do not oppose working for money as that is a punishment for original sin per Gen 3. I oppose loving money, seeking money at work or elsewhere to care for your own to the extent it makes money God, adultery with God, and makes your eye evil as Jesus teaches. So, when you look at others you seek money, merriment and material gain, with evil eyes, too blind to see clearly to love the person before them unconditionally, not based on getting something out of it.

I do not oppose science either. I oppose the government compelled trust in science in place of God. Science is not God. Science is learning. I perform science all the time, but do not declare myself an expert or master. I am a pupil, studying God's creation. God is the master, the teacher, not me. This humility verses pride, this trust in man in place of God is a matter of eternal life and eternal death, the second death. It is no small matter, but a serious one where souls are lost in the fire through believing a lie, deception, as truth. Getting it wrong is not ok, but eternally deadly, with regards to where you place your faith. As for me, I will trust the Lord, as God, not science, not man, not money, not my imperfect self.

Science is the study of things. I oppose calling the pupil a master, an expert on things, the authority to listen to, as that appoints them God and defeats science by claiming they learned enough to stop learning, ending science. It also reflects the image of the devil by instilling pride instead of humility.

Experts are not God. They are not the authority. Jesus teaches us call no one your expert but God. People are harmed because they give into temptation to blindly rely on experts instead of examining conflicts of interests and known and unknown variables.

I also believe people go to hell for getting it wrong, should they not repent, blinded by their paycheck or profit to care for their own, not caring to seek to know truth, how their work may be improved to prevent harm towards others. Somehow courts do not correct the experts and businesses who harm people for profit. They appear insulated by defenses, which prevents correction or healing if you will from sin, getting it wrong harming people by making products made to break, repair and replace instead of last, causing artificial indebtedness in violation of the Bible's teachings or causing cancer or other physical ailment. I think I understand how the system is rigged to guarantee injustice. I also understand that the Courts cannot prevent the system from being cheated if no one asks them. I do believe the courts may choose to unrig the system to make our imperfect union more secure, stronger, free in the face of a planned overthrow of our way of government through the World Economic Forum's plans.

Science is called philosophy in the bible, and God warns us not to be deceived by philosophers who sell theories to serve their own vanities. I do not ignore experts, but I discern their hearts as commanded by Jesus. Matthew 12:34-38.

Do they serve the will of God or the vanities of men? I know God, and it is God in me (not me) which discerns the hearts of others to correct to prevent condemnation.

Our healthcare should not be focused on money at the cost of sacrificing human health and life. Business greed is lawlessness and reflects the image of the devil and children of the devil not saved from hell. The rule of law can tame the beast sin, to transform children of the devil to children of God by love for one another, not sacrificing others for worship of money as god. Court correction can save lives and eternal lives. Judges may choose to be eternal life savers or not. They have a choice no matter if they lament, they have no choice. They have free will beyond the corners of the laws and must use their check upon those who draft the laws by their individual, special, interpretations of the law to protect people from being sacrificed for profit. They are full of deceit that damns if they cry baby, they have no power. They have power to reflect the image of God by use of their conscience mind to love, their individual brain. They have free will, even if the individual judges say they do not. They are incorrect. Individual judges are special and powerful, not powerless.

With humility there is grace and salvation. Choosing to know truth, turning away from hardness of heads and hardness of hearts, turning away from the pride of man saves. But the proud are sadly without eternal life should they not unharden their heads and hearts. Jesus teaches us to have salt amongst ourselves, humility correcting one another, without condemnation, with hope. So, we are not led astray by the desires of man to harm and hell. It is pretty loving to correct folks to prevent harm and hell. That is the power individual judges have, to save eternal lives if they so choose. I hope they so choose.

You are not required to believe as I do, and you may even think my beliefs are dumb. Yet, the Constitution protects my freedom to believe by the dictates of my conscience, not the bought or bartered for, force fed thoughts of experts. The state may not impermissibly punish me because the state believes differently. The state is not God either.

I stand firm on my faith in Jesus. I am not acting as an attorney advocate on behalf of another. I am standing up as an individual, an accused party, standing with God, even if I stand alone. Please note, I am not in government. If I was, my

freedom to speak on religion would be limited, to prevent the use of the cloak of the government to establish government religion by my mere voice.

With love,  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, De 19939  
meghankellyesq@yahoo.com

On Tuesday, January 11, 2022, 09:38:18 AM EST, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Kelly

I am sorry you are not feeling well. The ODC will agree to a one week postponement of the hearing based on your current medical condition - shingles. However, because a hearing is pending before the Board on Professional Responsibility, you should file a formal motion with the Board requesting a continuance and outlining the medical reasons for your request. You may represent in the motion that ODC has no objection to a one-week continuance based upon your representation below.

If the Board grants the continuance, and if after one-week has passed and you continue to be unwell, the ODC may support a further continuance of the matter if you provide documentation the treatment you are receiving and a doctor's opinion you are unable to proceed based on your condition.

Patty

Patricia Bartley Schwartz

Office of Disciplinary Counsel

Supreme Court of Delaware

405 N. King Street, Suite 420

Wilmington, DE 19801

Temporary number 302-668-3467

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Monday, January 10, 2022 5:01 PM  
**To:** Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>; Dolph, Lisa (Courts) <Lisa.Dolph@delaware.gov>; Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov>  
**Subject:** (Patricia's stance) ODC's stance on postponing the hearing Bd 11537B

Patricia,

Please provide your stance on postponing the hearing. I am not feeling well. I am getting over the shingles. I previously requested the Board and Court postpone the hearing. You have notice of objections. I may make another motion.

What is your stance? Please have mercy and look at me as a human not a case.

Thank you.

Good night,

Meghan Kelly

23012 Shawnee Dr.

Dagsboro, DE 19939

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



Health care that cares.jpg

64.2kB

**Healthcare that Cares  
Not Healthcareless**

**VOTE  
MEGHAN KELLY  
"Your Health is your  
Wealth"**

**PAID FOR BY MEGHAN KELLY, ESQUIRE FOR 38th DISTRICT**

## Exhibit J

Re: CONFIDENTIAL - Board Case No. 115327-B

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: karlis.johnson@delaware.gov  
Cc: lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov  
Date: Tuesday, January 4, 2022, 04:31 PM EST

Good afternoon,

Thank you. That is very helpful.

I am not feeling so well. I already sent an email to Patricia Swartz yesterday.

I have taken three covid tests and I am negative. However, I believe I developed the shingles yesterday. I had them before when my grandmom died, and a friend confirmed it looks like shingles, Dr. Dean Dobbert.

So, I wanted to let you and the courts know, should anything happen to me or if I continue to get worse.

Thank you. Have a good afternoon.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Tuesday, January 4, 2022, 04:01:06 PM EST, Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov> wrote:

Ms. Kelly,

To clarify my message from last week, you may submit your BPR filings via email to [Supreme\\_Court\\_BPRFilings@delaware.gov](mailto:Supreme_Court_BPRFilings@delaware.gov)

or by U.S. Mail – you do not need to do both.

Thank you.

**From:** Johnson, Karlis P (Courts)  
**Sent:** Wednesday, December 29, 2021 4:05 PM  
**To:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>; Hutt, David C. <[DHutt@morrisjames.com](mailto:DHutt@morrisjames.com)>; Schwartz, Patricia (Courts) <[Patricia.Schwartz@delaware.gov](mailto:Patricia.Schwartz@delaware.gov)>  
**Cc:** Dolph, Lisa (Courts) ([Lisa.Dolph@delaware.gov](mailto:Lisa.Dolph@delaware.gov)) <[Lisa.Dolph@delaware.gov](mailto:Lisa.Dolph@delaware.gov)>  
**Subject:** CONFIDENTIAL - Board Case No. 115327-B

Ms. Kelly's filings in Board Case No. 115327-B have been received and shared with the board panel. The motion to remove counsel, which is currently pending before the Supreme Court, has also been provided to the board panel.

Future filings in Board Case No. 115327-B should be emailed to the mailbox designated to receive BPR filings: [Supreme\\_Court\\_BPRFilings@delaware.gov](mailto:Supreme_Court_BPRFilings@delaware.gov)

Regards,

Karlis Johnson

## Exhibit K

## Board No 21-11537 B/ Poor exploited sacrificed for profit

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: karlis.johnson@delaware.gov; lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov  
Cc: meghankellyesq@yahoo.com  
Date: Wednesday, January 5, 2022, 09:06 AM EST

Morning,

Please see attached relating to the broken phone that could not make or receive calls.

You may be able to choose to help the poor instead exploiting their need to serve the greed, not good, of private partners. You may choose to stop the human sacrifice, the feeding of the sheep to wolves in sheep's clothing.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
no phone  
meghankellyesq@yahoo.com  
acting as a party, not an attorney advocate on behalf of another  
No 4968



Broken phone wrongly earns money for months.pdf  
137.5kB

## **Fecha límite federal: January 19, 2022**

**Use su teléfono de Assurance Wireless para hacer una llamada, enviar un mensaje de texto o entrar a Internet (sin usar Wi-Fi) a más tardar para la fecha límite que se indica arriba, o de lo contrario perderá su servicio Lifeline GRATIS.**

Corre el riesgo de perder su servicio Lifeline GRATIS para el January 19, 2022.

Han pasado unos 25 días desde que usó su teléfono de Assurance Wireless. Si no usa su servicio de Assurance Wireless al menos una vez cada 30 días para mantener activa su cuenta, será eliminado del programa Lifeline y su servicio telefónico Lifeline GRATIS será suspendido.

### **¿Qué cuenta como uso de teléfono elegible para mantener activa mi cuenta de Assurance Wireless?**

A fin de mantener activa su cuenta, use su teléfono de Assurance Wireless para hacer una llamada, contestar una llamada, enviar un mensaje de texto o usar sus datos móviles GRATIS (usar Wi-Fi no cuenta) para conectarse a Internet.

**¿Cómo uso mi plan de datos móviles de Assurance Wireless GRATIS, en lugar de Wi-Fi, para conectarme a Internet?** Es muy fácil. La forma más rápida de cambiar entre Datos móviles y Wi-Fi es a través del Panel de notificaciones. Simplemente mueva hacia abajo el Panel de notificaciones que se encuentra en la parte superior de la pantalla del teléfono deslizando el dedo en un movimiento hacia abajo. Busque el ícono "Mobile Data" (Datos móviles) y toque el ícono para activar y desactivar los Datos móviles. Asegúrese de utilizar sus datos móviles GRATIS al menos una vez al mes.

Si no utiliza su servicio a más tardar el January 19, 2022, perderá su servicio de Assurance Wireless GRATIS y será eliminado del programa Lifeline. Tendrá que volver a hacer su solicitud si desea seguir recibiendo el servicio Lifeline.

Si tiene alguna pregunta, por favor llámenos al 1-888-321-5880. Gracias por ser cliente de Assurance Wireless.

Atentamente,

**Assurance Wireless**

**Una Forma Libre de Preocupaciones para Mantenerse Conectado**

**P.D. ¡No espere más! ¡Use su teléfono de Assurance Wireless a más tardar el January 19, 2022 para hacer una llamada, enviar un mensaje de texto o entrar a Internet (usar Wi-Fi no cuenta), o su servicio telefónico Lifeline GRATIS será suspendido.**

El servicio Lifeline, un programa de asistencia gubernamental, está limitado a uno por hogar y no es transferible. Un hogar se define como cualquier individuo o grupo de individuos que viven juntos en el mismo domicilio y comparten sus ingresos y gastos. Los consumidores que deliberadamente hagan declaraciones falsas con el fin de obtener el beneficio pueden ser sancionados con multa o minutos no utilizados no se transfieren. **Servicios adicionales:** voz 10c/min, o 250 mins. con opción adicional de \$5; planes de datos e internacionales requieren la compra de opciones adicionales. El acceso al correo de voz utiliza minutos del plan o adicionales. Los clientes pueden utilizar el servicio de Assurance Wireless con el plan pago lo que consumes (pay-as-you-go) después de la cancelación del servicio Lifeline. Para los clientes de todos los estados, excepto FL, cuando la cuenta se cambia el plan paga lo que consumes y está inactiva durante 120 días, el día 121 la cuenta será cerrada y se perderán todos los fondos no usados y el número de teléfono. Para los clientes de FL, cuando la cuenta es cambiada el plan paga lo que consumes, el día 366 la cuenta será cerrada y se perderán todos los fondos no usados y el número de teléfono. Podrían aplicarse impuestos de venta estatales y locales y otros cargos. Podría requerirse una recarga Top-Up mínima de \$5. **Otras ofertas:** ofertas no disponibles en todos los estados/áreas y podrían variar por estado. Cobertura no disponible en todas partes. Assurance Wireless se reserva el derecho de cambiar o cancelar las ofertas en cualquier momento. Se aplican las reglas que rigen el uso prohibido de la red y otras restricciones. Detalles en [assurancewireless.com](http://assurancewireless.com). © 2021 Assurance Wireless USA, L.P.

## Exhibit L

Board filing part 1 of 3) memorandum of law, motion, cert of serv and table of exhibits)  
Board Case No. 115327-B

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: supreme\_court\_bprfilings@delaware.gov  
Cc: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov  
Date: Friday, December 31, 2021, 12:15 PM EST

Good morning,

Attached, please find 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 to be provided in additional emails.

Thank you. Have a good weekend.

Very truly,  
Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
4968  
no phone  
Acting as a party not an attorney advocate on behalf of another

-  Motion.pdf  
363.4kB
-  Memorandum of law.pdf  
402.5kB
-  Certificate of service.pdf  
64.4kB
-  Table of Exhibits Meg's Motion regarding experts at hearings.pdf  
165.2kB
-  Postal receipt.pdf  
36kB

## Exhibit M

Re: CONFIDENTIAL - Board Case No. 115327-B

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov  
Cc: angela.james@delaware.gov; supreme\_court\_bprfilings@delaware.gov; meghankellyesq@yahoo.com  
Date: Wednesday, January 12, 2022, 10:48 AM EST

Morning,

To clarify, I did not make another motion.

I merely communicated with the coordinator and you and indicated I would appreciate more time to afford a fair opportunity to prepare a defense. You are free to give a stance in order to possibly prevent additional paperwork.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Wednesday, January 12, 2022, 09:35:07 AM EST, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Johnson

The ODC will provide a written response to Ms. Kelly's motion.

Thank you

Patty

Patricia Bartley Schwartz  
Office of Disciplinary Counsel  
Supreme Court of Delaware  
405 N. King Street, Suite 420  
Wilmington, DE 19801  
Temporary number 302-668-3467

**From:** Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov>  
**Sent:** Wednesday, January 12, 2022 8:59 AM  
**To:** Meg Kelly <meghankellyesq@yahoo.com>; Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>  
**Cc:** James, Angela D (Courts) <Angela.James@delaware.gov>; Supreme\_Court\_BPRFilings <Supreme\_Court\_BPRFilings@delaware.gov>  
**Subject:** RE: CONFIDENTIAL - Board Case No. 115327-B

Ms. Schwartz,

Please provide ODC's position so that I may share it with the board panel.

**From:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Sent:** Tuesday, January 11, 2022 4:18 PM  
**To:** Schwartz, Patricia (Courts) <[Patricia.Schwartz@delaware.gov](mailto:Patricia.Schwartz@delaware.gov)>; Johnson, Karlis P (Courts) <[karlis.johnson@delaware.gov](mailto:karlis.johnson@delaware.gov)>; Supreme\_CourtFilings (MailBox Resources) <[Supreme\\_CourtFilings@delaware.gov](mailto:Supreme_CourtFilings@delaware.gov)>; Supreme\_Court\_BPRFilings <[Supreme\\_Court\\_BPRFilings@delaware.gov](mailto:Supreme_Court_BPRFilings@delaware.gov)>; James, Angela D (Courts) <[Angela.James@delaware.gov](mailto:Angela.James@delaware.gov)>; Dolph, Lisa (Courts) <[Lisa.Dolph@delaware.gov](mailto:Lisa.Dolph@delaware.gov)>  
**Cc:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Subject:** Re: CONFIDENTIAL - Board Case No. 115327-B

Thank you for your mercy.

I don't feel well at all, but I would sacrifice sleep and my health to defend the worship of my God from state interference and retaliation for such.

I am crying with relief. Thank you for the reprieve, for now.

However, the reasons in my motions I required the hearing to be postponed is something more important than my health.

I desire to be afforded with the opportunity to build a defense, research and time to seek truth concerning unclear issues through discovery. January 21, 2022 doesn't afford me with much opportunity to subpoena potential witnesses, draft interrogatories, requests for admissions or build a case.

I was hoping the Board would treat this as a court case with scheduling for discovery. Would you please consider postponing a date until after discovery is performed?

Otherwise, I have to look into appealing this order to protect my substantive and procedural due process guarantees from a fundamentally unfair proceeding, affording me no time to adequately prepare and perform discovery, potentially subpoena witnesses and research after I get better at the law library.

I respectfully request the Board postpone the hearing to allow for discovery, and for filing of the motions after discovery, which may prevent the need for a hearing.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagbsoro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

On Tuesday, January 11, 2022, 03:41:32 PM EST, Johnson, Karlis P (Courts) <[karlis.johnson@delaware.gov](mailto:karlis.johnson@delaware.gov)> wrote:

Please see the attached order granting the request for postponement.

E X F

I could not scan  
in the Exhibit  
page I'm sorry  
thank you.

# Exhibit F

**BOARD ON PROFESSIONAL RESPONSIBILITY  
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**MEGHAN M. KELLY'S ANSWER, DEFENSES, AND OBJECTIONS TO  
ODC'S PETITION TO TRANSFER MEGHAN M. KELLY, ESQUIRE TO  
DISABILITY INACTIVE STATUS**

AND NOW, this \_\_\_\_ day of November, 2021, respondent, Meghan M. Kelly, pro se, answers, objects and identifies defenses to the petition, Office of Disciplinary Counsel (“ODC”) brought through its counsel, Patricia Bartley Swartz (“Patricia”), to transfer me to disability inactive status pursuant to Rule 19(c) of the Delaware Lawyer’s Rules of Disciplinary Procedure. (“PR”).

**1. Respondent is a Delaware lawyer admitted to the bar of the Delaware Supreme Court in 2007. Respondent is currently eligible to practice law, with no conditions or restrictions.**

**ANSWER:.** I incorporate the facts in the below related answers, and exhibits thereto, to the answer to this paragraph.

Admitted, in part. I am eligible to practice law, but have not practiced law for about six years.

Denied in part, with regards to “Respondent is eligibility to practice law, with no restrictions.”

The ODC’s conduct and action has eliminated my *eligibility to practice law* with any law firm, and has caused a *restriction upon* my ability to continue negotiations with my former firm and has caused a restriction upon my ability to *practice law* with my former firm and other law firms. (Emphasis intended).

I was negotiating to perform real estate settlements with the law firm I left in 2016, before the pandemic hit, McDonnell and Associates, P.A., Attorneys and Counselors at Law, and the case *Kelly v Trump* arose in the Chancery court in September 2020. I still hope to rejoin my former firm to perform real estate settlements.

I do not enjoy litigation, but was compelled to litigate as a party in *Kelly v Trump* to protect my freedom to worship God without government incited persecution. I believe using words, not weapons of armed service members is the more powerful and effective way to safeguard our individual liberties and the security of our nation. I believe our courts through the individual judges may choose to be more powerful than a nuclear weapon, and more just, merciful and kind too. I hope the courts use their gentle power to reduce the religious violence in our nation and around the world. I have hope they may be our hero yet.

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*Kelly v Trump* also prevented continued negotiations with my former law firm. By letter, dated November 1, 2021, the United States Supreme Court denied my writ of certiorari, Case Number 21-5521, available for public view on the Supreme Court of the United States web site, under the Docket Search function at <https://www.supremecourt.gov/docket/docket.aspx> See (Exhibit 1)

The ODC's conduct will likely prevent an opportunity of a life time, a position back at my old law firm, should the Board not dismiss this petition, based on the fact this proceeding is unlawful, unconstitutional as applied to me, a party of one, motivated by the ODC's disdain for my religious beliefs, and to punish and discriminate against me for the exercise of First Amendment freedoms, including the right to petition the courts, exercise religion, speech and association.

The evidence indicates the ODC may also be bringing this case to potentially cover up mistakes and wrong doing of government agents, or to discriminate against me based on poverty, as I defend First Amendment liberties requiring the ODC to meet the standard of strict necessary to burden my exercise of protected rights. The ODC does not meet such a burden. See Exhibit 2, 3, 4.

I object to this petition which has created a restriction on my ability to practice law, and a restriction upon renewed negotiations with my former law firm. This petition is brought to harass me and to harm my character and suppress my Constitutionally protected speech, religious exercise, association, First Amendment

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right to petition the court for grievances, in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment. The ODC through admission at paragraph 7, unlawfully bring this petition in retaliation for and in interference of the exercise of my protected rights, motivated by desire to discriminate against me for my religious exercise and beliefs I presented through protected speech and petitions.

The ODC's conduct, with agents, and coconspirators cause irreparable harm, causing me the loss of my First Amendment freedoms, and the loss of significant employment opportunity with my former law firm by deactivating my paid for active license to practice law, and other employment, and associated opportunities. Injury to reputation itself is not a deprivation of liberty or property. *Paul v Davis* 424 US 693 (1976); Cf. *Kelly v. Borough of Sayreville*, New Jersey, 107 F.3d 1073, 1078 (3d Cir. 1997); Cf. *Clark v. Township of Falls*, 890 F.2d 611, 620 (3d Cir. 1989)

I have a property interest in my paid for license to practice law to use not only to seek employment, but to bolster my ideas to persuade law makers to pass policies to care for humanity. I am not going to stop using my conscience mind to care about others by seeking to prevent harm or prepare folks for it, regardless as to what my future holds. The deactivation of my license and slanderous term disabled because I think for myself will diminish my voice. (See Exhibit 12,

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Recent email to law makers to prevent an economic crash and an overthrow of our government, and attachments thereto, Exhibit 13, President Kennedy's executive order creating money without debt or interest to care for the people), (Exhibit 14, President Lincoln's executive order creating money without incurring debt or paying interest), (Exhibit 15, Email dated November 14, 2021), (Exhibit 16, an attachment thereto, a book written by the World Economic Forum founder outlining a planned elimination of the dollar, planned 47 percent unemployment of Americans by 2026-2027, elimination of jobs including journalists and lawyers and real estate brokers, as wealthy buy up land), (Exhibit 17, another book co-written by the founder of the world economic forum outlining schemes to overthrow the US as the hegemonic state, Exhibit 18, Excerpts of the book, *Creature of Jeckyll Island, a Second look at the Federal Reserve*, by Edward Griffin, 7th printing 1998, 3rd Ed., by American Media, to show the Great Depression was created unnaturally by the Federal Reserve and other banks. This book appears to have the theory wars are instigated to create debt to create banks profit, and the environmental and biological concerns can do the same by unjust decrees that do not protect the environment and lives of humanity. Instead, unjust decrees such as fines and material rewards taken out of others pockets, create debt for bank profit by increasing desperate conditions. So wrong doers may get as much as they can get for as little as they can get without restraint in the form of just rules of law.),

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(Exhibit 19, World Economic Forum article, *8 predictions for the world in 2030*, by Ceri Parker, dated November 12, 2016.)

The ODC also injures my reputation to discredit my petitions and speech, to hide government mistakes and misbehavior, substantially diminishing the magnitude of my speech and petitions to the courts for grievances against government agents related to my Constitutional rights.

The ODC requires I sacrifice my individual First Amendment liberties for the sake of an artificial entity without heart, the professional organization, which has no ability to do good by love since it exists on cold hard or electronic cash and conditional labor, not unconditional love. I am against Satanic human sacrifice of my individual liberties and the individual liberties of others to serve artificial entities without hearts who have no ability to do good. I believe the individuals within entities have the power to choose to do good by choosing to use their brains, their free will, also known as conscience mind, to think, to know, to unconditionally love others, even those with beliefs that conflict with the conditional beliefs of their organizations, by respecting the freedom of associates to disagree, even to be wrong, without condemning or retaliating against the individual. The individuals within the profession, and within organizations are stronger than the entities they associate with. I believe they can reflect the image of God by selfless unconditional love, unearned, by respecting the dignity of

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others, even those with diverse religious beliefs that conflict with the conditional, conformed belief of the entity or association.

The ODC's position would have the Board recognize a right for the plurality by government authorized vote through the Preliminary review committee and the Board to eliminate, "and ignore the right of others, [including me] to worship in a different manner, or in no manner at all. [The Third Circuit held, a government authorized vote cannot] because 'the individual freedom of conscience protected by the First Amendment embraces the right to select any religious faith or none at all.'" *A.C.L.U. of New Jersey v. Black Horse Pike*, 84 F.3d 1471, 1477 (3d Cir. 1996); *Citing, Wallace v. Jaffree*, 472 U.S. 38, 52 (1985) (This relates to a student vote in a school concerning prayer).

The Third Circuit in *A.C.L.U. of New Jersey v. Black Horse Pike*, further held,

"Just as the right to speak and the right to refrain from speaking are complementary components of a broader concept of individual freedom of mind, so also the individual's freedom to choose his own creed is the counterpart of his right to refrain from accepting the creed established by the majority.

An impermissible practice can not be transformed into a constitutionally acceptable one by putting a democratic process to an improper use. There should be no question "that the electorate as a whole, whether by referendum or otherwise, could not order [governmental] action violative of the [Constitution], and the [government] may not avoid the strictures of [the Constitution] by deferring to the wishes or objections of some fraction of the body politic." *City of Cleburne v. Cleburne Living Center*, 473 U.S. 432, 448 (1985) (citation omitted). A policy that does this can not be legitimized by arguing that it promotes the free speech of the majority." Id. At 1477-78.

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“Delegation of one aspect of (this petition to the plurality of the Preliminary investigative committee) does not constitute the absence of [government’s] control over [this unlawfully brought petition]” Id. At 1479.

I believe God does not force his will on us, but gives us freedom to choose his will, giving us freedom of conscience no matter the temptations to bend our will to the world’s will to worship the created instead of the creator, or to worship the lusts and vanities of life, money, merriment, and material gain. The ODC seeks to control me under the deception of order and aide, by seeking to eliminate my freedom of conscience by forcing the will of its professional entity upon me by essentially requiring I exchange my First Amendment freedoms, or renounce my exercise of those freedoms as a disability, in order to maintain my active license.

The ODC essentially requires I accept what I believe is the mark of the beast, also known as the whore, and the twice dead, children of the devil not yet adopted into eternal life as children of God mark, in order “to buy and sell,” as an attorney, compromising my faith in God, by making the profession a God, or something else my savior, such as money. I believe this compromise is whoredom with the world, adultery with God. (Citing, *Revelation* 13:16-17, “And the second beast required all people small and great, rich and poor, free and slave, to receive a mark on their right hand [by how they live] or on their forehead [by what they think about God’s will or the world’s], so that no one could buy or sell unless he

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Document: 155-3  
Page: 160  
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had the mark—the name of the beast (the sin against the holy spirit, hardness of heart, head and hands, absence of unconditional love, conditionally caring like easily misled through temptations, a.k.a. operant conditioning, like “blind and dumb” beasts, not humans reflecting the image of God...”), also see, *Isaiah 6:9, 6:10, 56:10, Jeremiah 5:21, John 12:40, Matthew 15:14*, See also, *A.C.L.U. of New Jersey v. Black Horse Pike*, 84 F.3d 1471, 1482 n.9 (3d Cir. 1996), also see, (*Hosea 2:4* “I will not show my love to her children, because they are the children of whoredoms [adultery].”); (*Hosea 5:4* “Their deeds do not permit them to return to their God. For the spirit of whoredom is within them, and they know not the LORD.”), *1 John 3:10*, “This is how we know who the children of God are and who the children of the devil are...”, *John 8:44*, “You belong to your father, the devil...”)

I believe that is a sin against God, and reflects the image of the devil for the ODC and Patricia to seek to bend my free will through temptations for me to give into government pressure to renounce my stance in separation of government and religion, my petitions, speech, association, and religious exercise or beliefs.

Perfection is not the standard for people to be protected under the First Amendment. I am still protected even if I made mistakes, and do not lose my ability to worship, petition, associate and speak. I am protected even if the ODC or the government believes I am wrong. Neither the ODC nor the government is

master and controller of our religious conscience, but are limited to the Constitutional restraints.

Unlike God who gives us choice, in *Isaiah* Chapter 14, Satan desired to be as high as God by controlling the world, by powers and principalities to tempt people to bend their will by conditional relationships, rewards and avoidance of harm to his desires out of pride, not love.

I believe government leaders should be servants, and encourage free speech, debate, disagreements, finding flaws to improve, in hopes to make society richer not only in material gain but eternal gain. *Matthew* 23:11. I believe people are the treasure government entities should protect, not exploit as commodities to use for material gain, which is all “moth and rust,” in the end. *Matthew* 6:19.

I did not agree to sacrifice my free will, freedom of conscience to believe in Jesus to accept what I believe is the mark of the beast, by the forced, trained, operantly conditioned will of the ODC to glorify the punishments of original sin, death under the guise of the pretty word martyrdom, child bearing, desire for your spouse, *work, or the fruits of labor* to reflect the image of Satan by pride. (Emphasis intended). I believe the punishments for original sin outlined in *Genesis* Chapter 3, are not the purpose of life, but were given to us by God to teach us humility unto salvation. Yet, I believe many twist the scripture to behave like Satan to bend others’ will to their desires, essentially making themselves their own

God, like Satan in *Isaiah* Chapter 14, seeks to make himself god in this world. (See, *Genesis* 3:1-3:7, and *Matthew* 4:1-4:11, to see examples of how the devil quoted scripture to serve the devil's will in place of God's will, under the guise of God's will.), (See, *2 Corinthians* 4:4, the devil is called the god of the world, who blinds the minds of people by distractions and temptations. So, they are not saved from being thrown into the fire on the last day at the resurrection of the dead from their graves for judgment).

I object to being forced to accept the mark of the beast to buy and sell, in exchange for my license to practice law. I object to the *restriction* the ODC has placed on *my ability to practice law* by bringing this unlawfully motivated suit. (Emphasis intended).

The ODC acts so to injure my reputation that I will lose significant employment or associational opportunities by the loss of my paid for, active license to practice law, including my ability to practice law in the state of Delaware as a result of Defendants malicious punishment based on their disagreement of my protected Constitutional exercise of religious beliefs, speech, association and/or petition(s), in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment, should the Board not dismiss this case, as unlawful disparate treatment, as applied to me, in violation of the Equal Protections Clause of the Fourteenth Amendment

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There is no ‘de minimis’ defense to a First Amendment violation.”, *Doe v. Indian River School Dist*, 653 F.3d 256, 283 n.14 (3d Cir. 2011) (“*Elrod v. Burns*, 427 U.S. 347, 374, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976) (“The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.”); see also *Schempp*, 374 U.S. at 225, 83 S.Ct. 1560 (“[I]t is no defense to urge that the religious practices here may be relatively minor encroachments on the First Amendment.”)

The ODC’s conduct also endangers my life by discrediting my pleas and petitions for relief as others have attacked me based on my religious associated beliefs and speech, threatening me with harm. The ODC similarly endangers others by seeking to set precedent to blind the eyes of those charged to administer justice towards victims petitioning for relief from harm based on religious and associated relationships and beliefs, guaranteeing injustice, not the protection of the rule of law. Should I be in danger, others will take me less seriously by the ODC’s label “disabled,” thereby increasing risk of harm and potential death.

I object to the ODC’s *restraint on my ability to practice law*. It was unlawful for the ODC to take action against me during an active case with intent to conspire with others to harass and interfere with my law suit, *Kelly v Trump*, obstruct my access to the courts or to demean my credibility, motivated to discriminately punish me for the exercise of First American freedoms, based on

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disdain for my petitions, religious beliefs, speech, association or, and poverty. 42 USC Section 1985(2). (Exhibit 5, August 23, 2021 email. Note, the ODC refers to *Delaware Supreme Court pleadings* too, as the reason for their investigation. (emphasis intended).

The ODC had notice their conduct violated clearly established federal law. I told them. (See Exhibit 6, and Exhibit 7. Two emails I sent requesting the ODC desist in interfering with *Kelly v Trump*).

Interfering with my case, *Kelly v Trump* discriminating against me based on disdain for my religious beliefs, speech, petitions or affiliation, violates procedural and substantive due process protections to my unobstructed access to the courts to protect Constitutional freedoms, in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

ODC and their agents knew or should have known it was against the law to pressure a party, me, to obstruct the case *Kelly v Trump* (“case”), harass me, or pressure me to forgo the case, and now to punish me for exercising the right to petition, speech, exercise religious beliefs and association, regardless of poverty, and license to practice law. Poverty does not eliminate Constitutional protections of fundamental rights, nor did I sell or waive my Constitutional freedoms in exchange for permission to maintain an active license to practice law within the state of Delaware.

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There was no immediate need for the ODC to act, to humiliate, embarrass, upset and harass me during an active case, *Kelly v Trump*. I am no danger to the public as an actively licensed attorney, not currently practicing law or expecting to practice law on behalf of others. I have been holding off on contacting my former law firm until the pandemic subsides. I now must hold off on renewing negotiations until the issues in this petition are resolved. This petition is an unlawfully brought *restriction on my ability to practice law*, as discriminately applied. (Emphasis intended).

In *Kelly v Trump*, I merely defended my fundamental rights as an injured party, not as practicing an attorney. My ability to worship Jesus Christ and exercise my faith in God is the most important purpose of my life, more important than work, money and basic needs. I should not be compelled to waive fundamental rights, especially my ability to exercise my religion without government persecution, because of lack of resources attorney advocates need to perform their duties for others, as opposed to acting as a pro se, indigent party.

The ODC must not be permitted to compel me to choose between my license to practice law and my ability to exercise the right to access the courts, exercise of religious beliefs in Jesus, association or speech. Our Constitutional liberties are not negotiable by barter or exchange.

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At the start of my case in *Kelly v Trump*, I did not have a working computer or a printer. Since the case began, I got a new computer, which broke three times, once after I filed a brief to the Delaware Supreme Court, and secondly on August 23, 2021, after I filed my writ of certiorari with the United States Supreme Court, and most recently in November. See Exhibit 8.

The last week of September, I was compelled to purchase Microsoft Word to place on my fixed computer in order to respond to the ODC's September 27, 2021 threats by the filing of this Complaint. (See, Exhibit 9, receipt). Preparing documents is especially tough for me with regards to not only funding, but lack of resources required such as paper, postage, gas, ink, and a working computer, considering my unemployment and utter poverty.

The ODC needlessly burdens me financially with intent to cause pressure to conform to their pressured will, instead of my free will to openly worship Jesus without renunciation, and to exercise protected rights.

I do not regret imperfectly standing up for my ability to exercise my religious beliefs without government incited persecution against me in *Kelly v Trump*, no matter how many typos or how imperfectly I stood up for Jesus.

I am not required to uphold the standard of perfection, or to be without typos or mistakes in order to be protected under the Constitution and federal law, regardless as to my professional status or my poverty.

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My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right.

The Courts and the Board have a duty to defend Constitutional liberties, including my liberties, above self-interest and their own appearance, allowing for humility, grace and internal correction and improvement.

“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); See *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) (“In the performance of assigned constitutional duties each branch of the Government must initially interpret the Constitution, and the interpretation of its powers by any branch is due great respect from the others”).

The ODC is not above the Constitution and federal law. I plead illegality of this proceeding, as applied to me, and this case, brought with malicious intent to persecute me based on my religious beliefs, to obstruct my access to the courts and impede, impair and retaliate against me for my exercise of protected freedoms.

This proceeding is unlawful, as applied, and must be thrown out as a violation of 42 USC Sections 1985(2), 1983, 1988, the First Amendment applicable to the ODC pursuant to the Fourteenth, in violation of my protected religious exercise, petitions, association, right to petition, and in violation of the

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substantive and procedural Due Process clause of the Fourteenth Amendment, motivated with malice towards me based on my religious beliefs.

The ODC seeks to suppress my speech by labeling me disabled, to prevent my ability to practice law. So, others will not take my petitions, speech, religious exercise, and association seriously and hear my speech. The loss and the threat of loss of my paid for active license reasonably also diminishes my eligibility to practice law.

The ODC's conduct endangers the public and the administration of justice by setting precedent, 1. if others think or believe differently than the forced, compelled, operantly conditioned, controlled will of the government or its agents by exercising their free will, also known as their freedom of conscience, 2. then they are endangered of being labeled disabled through official proceedings, preventing their eligibility to work or associate in a profession.

The ODC diminishes the free flow of my speech, ideas and chills my speech by retaliating against me because I believe differently than the government agents, as reflected in my association, speech and petitions, and, or my poverty. The ODC sets the precedent if someone in the public stands up for their religious beliefs in God, they may be removed from active participation in professional work by threats to deactivate their license. My religious belief and the religious beliefs of

others are not disabilities. No one is above the law. No one is below the law, no matter how repugnant the ODC may find my religious beliefs in Jesus Christ..

The ODC sets the precedent if someone is poor, unable to afford working computers or other luxuries, and attempts to exercise their First Amendment freedoms, they may be declared disabled, ineligible to practice in a profession, and possibly be put away for attempting to seek equal protection under the law.

I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. Albeit should my former still be interested at any time, given my decreased marketability by this petition, I would take it.

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.

My former employer and I were discussing bringing me back on board in 2020, but the global pandemic and my petitions to the courts halted negotiations. When I last worked for my former firm, McDonnell and Associates in late 2016, my former law firm as a real estate attorney, my friend a Delaware Attorney, Dick

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Goll, Esq., another Delaware real estate lawyer, died. Through his death, I learned out of state real estate companies were practicing law without a Delaware license to practice law, exploiting people like my friend, the respected late Dick Goll, Esq., while allegedly messing up the chain of title per members of the real estate section of the Delaware Bar.

I recall people in the real estate section of the Delaware bar indicating there were title company addresses with no lawyer address to contact for deeds with errors, making the chain of title a problem for future buyers and sellers with no means to seek relief by an attorney who made such error. Since no attorney was on the deed.

I contacted the ODC in order to seek to prevent future problems and loss of tax revenue from the state of Delaware. Since out of state title companies do not pay taxes for attorney work, they unlawfully perform in Delaware. They seemed irritated that I asked them to save the state money and for help to correct problems in the chain of title.

I contacted law makers too, but no one helped me resolve the real estate issue.

I continued to seek to find a way to prevent the real estate title issues. A now retired Delaware Supreme Court Justice, Justice Holland kindly called me at my former law firm about the real estate title issues and offered to guide me on a

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different way to resolve the issue, by forming a committee to help the Court draft rules. However, if I was a member of a Delaware committee assigned by the government to investigate issues, I thought my rights, including the right to speak would be reduced, more limited, in order to safeguard the rights of those the government is charged to serve, as a possible government agent. I was concerned about losing my personal voice, in a committee with a communal conditional goal, whose aim may be concerning safeguarding the government's reputation, jobs and status as opposed to protecting citizens of Delaware from harm and the unnecessary need to increase taxes or deal with problems in the chain of title.

My law firm's office closed down at the end of 2016, and I have not practiced law on behalf of another person as an attorney representing another since then.

Instead, I remained concerned about the title company issues, and other federal and state law issues. I began contacting government leaders even more on other issues, and attending events where government leaders were scheduled to be, like Chamber events.

I sent so many comments to President Obama, he gave me a Christmas card, with an envelope spelling Delaware incorrectly, slanted left-handed.

I proposed more comments to lawmakers, but my computer recently crashed, and was wiped clean, including of my old passwords to different emails.

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None of my comments to government leaders moved them to act. So, I decided to run for office in the 38th District for the District of Delaware in 2018, in an attempt to fix problems myself.

A local newspaper, the Coastal Point, kindly allowed me to draft an article relating to the title issues with a proposed solution to resolve the issues, and increase Delaware revenues without raising taxes, burdening the common man. (Exhibit 10, newspaper article in the Coastal Point to correct out of state title companies).

To date, the title issue has not been resolved to my knowledge.

I continued to make comments to law makers, including on how to prevent oil drilling, safeguard social security, fully fund the schools and on how to improve healthcare.

I even drafted proposals for five separate articles of impeachment to impeach President Trump on. I contacted all 541 federal law makers by email, fax, phone call, post card or letter, on my quest to uphold the Constitutional laws that make us free. (See Exhibit 11, five articles of impeachment I proposed to impeach former President Trump)

However, none of my efforts made a difference. So, I looked into running for President without violating my religious beliefs by asking for donations or

signatures, without buying or being bought with money, but seeking the seat based solely on the vote.

I contacted the relevant election office in all 50 states regarding waivers for their fee or signature requirements. Both would require I violate my religious beliefs.

My religious beliefs were always at the forefront of my mind, but I sought a way I could be in a position to care for the people by creating just laws. I believe just decrees and justice in the courts is the solution, not money. The love of money, the security in money, teaching money is the savior is the problem, not the solution. I believe the love of money drives out the love for one another, and the love of God as savior, replacing money as savior, causing certain harm here and damnation in hell for eternity. I believe the courts have the power to be life savers and eternal life savers by valuing and protecting the dignity of individual people, unearned, required, as worth more than money and material gain. See *Amos 5:15*, *Matthew 23:23*.

I called the US Supreme Court regarding the issue, and a staff member kindly recommended I write the US Supreme Court a letter. I did write a letter, but the US Supreme Court was not able to respond as my issue was not ripe.

I kept contacting law makers to propose my ideas. They appeared to throw my proposals away, or did not read them, or sent me auto responses. So, I asked

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the Democrats if they would waive the signature and fee requirements as violating my religious beliefs. So, I would not be forced to relinquish my first amendment freedom to exercise my religious beliefs in order to run for the US House of Representatives. The Democrats denied my request. I made the same request to the Department of elections, a government entity. They denied my request too, essentially requiring I compromise my faith in Jesus in order to run for office.

I gave up on aspirations to run for office when Covid 19 hit the world. Since I studied the history of medicine in a course at UD, I knew it would be serious. I did not want to endanger people's lives and health to merely gain a position to pass decrees that cared for the people as opposed to harming them to serve business greed and the love of money.

I was also communicating with my last law firm, negotiating coming back on board as a real estate attorney performing real estate settlements. I set aside talks not only due to the pandemic, but also due to the government establishment of religion that caused a substantial burden upon my free exercise of religion, by causing people to demean me as not a Christian, to insult me, and endanger me, and my exercise of my religion, speech and association without the protection of the Court.

The violence throughout the nation based on religion or political association is not normal and I believe we, I, needed someone to govern and guide our nation

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with correction to prevent additional harm towards me and others throughout our country and the world. I hoped the Court would be our hero.

I filed *Kelly v Trump* to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoinment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations.

I believe the money in the bought or bartered for, not free union of church and state is one reason why religious-political attacks seemed to have increased in recent years. President Biden's Valentine's Day executive Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to

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be bestowed to religious organizations, including churches, in other countries to perform government functions under the guise of charity.

In my religion, Christianity, the first civil King of Israel, Saul was separate from the religious leader Samson. The second King of Israel, King David, was separate from the religious leader, Nathan. Even Jesus the Christ, was separate from the civil leader Caesar.

Keeping religion and government separate reduces corruption between the two, and prevents the elimination of the First Amendment guarantees of free exercise of religion and the prohibition against establishment of compelled government-religion.

**2. Delaware lawyers have a duty to conduct themselves with conformity with the standards imposed on members of the bar as a condition of the privilege to practice law.**

I incorporate the above and below answers, and exhibits referred therein into this answer.

Admitted in part. Denied, as applied by the ODC towards me, a party of one. I object to the ODC's standards they seek to impose upon me, as violations of my First Amendment exercise of protected conduct.

The ODC's standards require elimination of my protected First Amendment rights, the right to petition, exercise speech, exercise religious beliefs and associate, without government obstruction and retaliation, by ODC and their agents' conspiracy to obstruct, impede and interfere in my case *Kelly v Trump*, and retaliation but for the exercise of my Constitutional freedoms. Such standards imposed upon lawyers, and upon me, are unlawful in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment. Elimination of my free exercise of religion, freedom of conscience, free speech, First Amendment right to petition, and associate in exchange for a license is a cost too great.

Such standards imposed by the ODC are unlawful as applied to me under the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment, and this proceeding is unlawful in violation of the same and in violation of the substantive and procedural due process clause of the US Constitution, as applied. The ODC is discriminating against me, motivated by their disdain for my religious beliefs.

The proceeding itself is also unlawful since the facts relating to the issue of this petition arose in the Chancery and **Delaware Supreme Courts**, and such court's conduct through its agents, and arms, including judges and staff are material to the case. (Emphasis Intended).

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DE-Lapp's threatening letter arose, per my request to the **Delaware Supreme Court** to suspend attorney dues for lawyers facing economic hardship during the pandemic. (Emphasis intended)

The Delaware Supreme Court did not grant my request. Instead, I was retaliated against for making such request by DE-Lapp. It appears the Delaware Supreme Court or their agent instigated this retaliation by complaining to an arm of the Court since I made the request to the Delaware Supreme Court addressed to Chief Justice Seitz. My request was likely discussed with the other justices.

On or about January 7, 2021, I made a request to suspend attorney dues, for lawyers unemployed during the pandemic to the Delaware Supreme Court directed to Chief Justice Collins Seitz, Junior. (See Exhibit 20, Letter to Chief Justice Collin Seitz, dated January 7, 2021, seeking suspension of lawyer fees for lawyers unemployed during the global pandemic, and attachments therefore relating to negotiations with my former firm, who I hope will still consider me in light of this embarrassing petition.)

On or about February 2, 2021, the Delaware Supreme Court responded to my request indicating individual attorneys seeking a waiver of active attorney registration dues due to economic hardship or unemployment due to the pandemic must make an individual formal request. Exhibit 21

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On or about February 6, 2021, I paid \$353.00 for my active attorney dues.

Exhibit 22.

On or about February 5, 2021, I responded to the Delaware Supreme Court's determination with Constitutional concerns about violating the Equal protections clause by deferring to the Court's instructions by submitting individual requests which would create disparate treatment of a similarly situated class of people.

Exhibit 23. I also requested that all lawyers pay the same fee, regardless of years barred. *Id.*

It is November 2021. I have not received a response from the Delaware Supreme Court regarding my second letter.

Instead, in April 2021, Judge Clark interrogated me at BJs and required I come to his chambers or talk with him by phone concerning my active law suit, inferring I was in trouble.

I was disappointed in him for violating federal law, pressuring me, a party to apparently forgo my law suit and exerting pressure to embarrass, harass or bend my free will to the forced conscience of the state.

I indicated I did not have a phone, and was too poor to pay for gas, and needed to focus on my case, which is true. Nevertheless, I was shaken by Judge Clark's misbehavior and interference. That is not what is expected of a judge

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misusing the cloak of his authority and good reputation to exert undue influence to pressure me to forgo my First Amendment rights.

On May 24, 2021, De-Lapp sent a letter to me via E-mail only, appearing to create a threat of action, respond in ten days, stating, “Dear Meghan: We understand you may be experiencing some financial difficulties with regards to license fees...” Exhibit 24.

How did De-Lapp know of the letter I sent the Delaware Supreme Court unless the Delaware Supreme Court justices or their agents told them. Exhibit 24. The Justices did not grant me economic relief. So, it was not out of love and concern for me. Instead, it appeared to be concern and love of money, in the form of bar dues.

It is my religious belief that people will be thrown into the fires of hell on judgment day for allowing their love of money as their savior, to care for their family and business to drive their love for one another. When people value money, merriment and material gain more than humanity, I believe that is a reflection of the image of Satan, the mark of the beast, the mark of children of the desolate one, the devil.

I indicated the same to the Delaware District Judge with different words. Jesus teaches you cannot serve God and money, as master. I stand by God as

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savior. I am a child of God, not a child of the devil, the desolate woman, the world. *Galatians 4:27, Isaiah 54:1-5.*

I am born again into eternal life so long as I remain steadfast to the end. *John 3.* Please note people can lose salvation, it is not an instance in the past. *Matthew 24:13, 2 Peter 2:21, Ezekiel 18:24, Ezekiel 33:13, 1 Timothy 6:14, Hebrews 6:4.* It is a constant choice to lay down human wants and desires for God's will, sacrificing our desires to love God and one another, not giving into temptation to merchants to the false God of money that damns the tempters and the tempted to harm and hell.

The Board and the Government is not required to believe as I do, or accept my beliefs as truth. The Board, the ODC and the Court is merely required to determine whether my beliefs are genuine religious beliefs protected by the constitution.

Obviously, I believe many acts and beliefs the government teaches misleads people hell without repentance such as military violence and threat of violence instead of using words. I also believe people will go to hell on the last day for organized charity, forced volunteering, pro bono which teaches the mark of the beast under the deception of true charity, violating *Matthew 6:1-5*, no matter how normal and routine it may be, and no matter the employees were merely doing

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what they were told to do, should they not repent. Jesus teaches the will have no reward from their father, meaning no eternal life.

In *Matthew* 6:1-4, Jesus Christ says do not give seen. When you give charitable alms, do not know your left hand from your right, meaning do not give to get, no matter how small, including, trading favors, back pocket alleged good deeds, marketing, tax breaks, getting your foot in the door for a job, or the social aspect. All of these lead to harm, exploitation of those in need, and hell, by teaching people business greed is love, (the mark of the damned). Love is sacrificial, not getting, merely giving unconditionally. See, *Matthew* 10:8, "...You received without paying, now give without being paid." True charity is done in secret without reward, or it is not charity. It is just business. It is wickedly deceptive to say otherwise.

There is no shame in humbling yourself and asking for charity directly. I believe it is sin to ask on behalf of others under the guise of charity for self-gain, no matter how small, including praise of men and tax breaks. Organized charities and business fundraising violate Jesus Christ's teachings. I believe school children learn to go the wide way to hell through their unpaid child labor for corporate profit, by requiring they fundraise for sports, book sales, pizza sales, car washes, cupcake sales and activities, under the deception of charity. I believe they learn the mark of the beast, is love, giving to get is love. No, business by barter or

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exchange, even for praise or forced peer pressure to fit in, is business, conditionally giving to get, not love. Love is unconditional. I believe all people should be respected unconditionally, unearned, regardless of race, religion or place of origin. Business is not the sin. I believe teaching business greed is love is sin. The bible teaches those who misunderstand go to hell, even children are damned to hell. See, *Ezekiel 9:3-6, Luke 17:2*, and *John 3:1-14* to confirm children go to hell on the last day too.

I believe churches mislead people to hell by asking for money from others to give to those in need under the guise of charity instead of obeying Jesus by giving from self in secret at a worldly loss, not giving out of one hand and getting out of the other, taking from others to hand off as charitable love from self. I think churches confuse the worldly secular function in the Book of Acts for distribution of resources to assist based on need as charity. That is not charity, but is governing.

Since I believe the US government teaches beliefs and conduct leading to hell, it is my religious belief the establishment of government religion under the guise of holiness is misleading people I love to go the wide way to hell under the false comfort of heaven. I believe the ODC is forcing even me to go to hell by requiring I compromise my faith in Jesus or face severe penalties, the potential deactivation of my license and the insulting label disabled but for my belief in Jesus.

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If the government sins in its own name, it is a less heinous sin than to wrongly use God's holy name in vain for government gain. Our government leaders are fallible people who should also be afforded grace with correction and mercy.

It bothers me that the Bible teaches most people go to hell. Jesus teaches few people have eternal life. *Isaiah 10:22, Matthew 7:13-15, Luke 13:23-28.* I love people and so not want them to be thrown as sticks as fuel for the fires of hell to be no more. See, *Isaiah 10:19.* That is why I had a desperate desire to preserve not only my own free exercise of religion from government incited burdens, but I desired to also protect others from government religion that I believe damns. I love others and do not want them to be no more, without eternal life. So, I rushed to file my complaint against President Trump, believing perfection is not required in times such as now. Swift leadership is required. See Exhibit 25.

It is not ok for the government to mislead people to hell by bought and bartered for government religion. It is not ok for the government to punish me for seeking to protect and exercise my religious belief in God as God, not money as God. I am allowed to believe differently than the established government religion of business greed, the mark of the beast. Business is not the sin. The sin is allowing the love of money to drive out the love of humanity under the false belief money is the savior for all.

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I am horrified by the establishment of government religion, teaching servitude to money, merriment, material gain leads to heaven, when it leads to giving into temptation to sin against the holy spirit by hardness of hearts, heads and hands, leading to hell. I do not want people to go to hell under the false assurance they will go to heaven. This deception damns. I had a fire in my belly to stop the deception the established government religion creates, per the attached Exhibit 25.

I do not regret standing up for my faith, my religious beliefs out of love for God and humanity, no matter how imperfect, poor, and emotional I am with regards to my faith in Jesus. I am fighting to protect souls from hell, people I love died, I believe to be damned for putting family first, putting immigrants down, and other perceived outsiders down, reflecting the sin against the holy spirit, hardness of heart.

I fight the good fight of love in truth, with words not weapons each day. Winning is not most important in this fleeting life. Followers of Jesus Christ appear to lose in this world. *Mark 13:13*, Doing the right thing is most important to God. God teaches that if we follow him, we will be persecuted here, hated here. *Matthew 10:17*, *Matthew 10:22*, *Matthew 24:9*, *John 15:18-21*, *John 17:14*. The world wants to do what it wants to do, not to lay down its desires to care to critically think, know, love. *John 3:19*. “[E]veryone born of God overcomes the

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world.” *1 John 5:4*. I may look like a loser before the world, but I have won eternal life so long as I remain steadfast to the end, remaining a child of God.

I believe we have a choice life or death, eternal life or damnation in the second death, without eternal life. *Jeremiah 21:8*. I choose life, not death by seeking the dollar as God.

Per the April 23, 2021, letter ODC sent, they also refer to Delaware Supreme Court pleadings as the source of their investigation. It is reasonable to infer the ODC or their agent may have gotten such pleadings from the Delaware Supreme Court.

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 these answers. Neither is the ODC. Complaints to ODC may have gone through agents of the Delaware Supreme Court.

I cannot call the Delaware Supreme Court as a witness in a case they preside over. Pursuant to *Federal Rules of Evidence Rule 605*, 28 U.S.C.A. 605, “The presiding judge may not testify as a witness at the trial.”

Additionally, the members of the Delaware Supreme Court are material witnesses to the facts relating to this petition.

Pursuant to 28 USCS § 455 (b)(1) (5)(iv),

“(b) [Judges] shall also disqualify [themselves] in the following circumstances:... (5) He:... (iv) Is to the judge’s knowledge likely to be a material witness in the proceeding.”

Here the Delaware Supreme Court knows the members are material witnesses to the facts that brought this dispute, the petition. See Exhibits 2, 3, 4, 5, 21, 22, 23, 24 incorporated herein. They must recuse themselves and are without jurisdiction. They cannot accept a waiver under this subsection b. 28 USCS § 455 (e).

Pursuant to 28 USCS § 455, (a),(b)(1):

**“(a) Any justice, judge, or magistrate [magistrate judge] of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.**

The Delaware Supreme Court’s impartiality might be reasonably be questioned as the facts evidence the Delaware Supreme Court appeared to have instigated or participated in the ODC’s and their agents’ or co-arms interference with my case *Kelly v Trump*, and retaliation against me but for the exercise of protected freedoms, motivated to suppress my religious beliefs, speech and petitions.

Pursuant to (b) He shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;”

The Chancery Court and Delaware Supreme Court members have “personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;”

The facts related to the ODC’s petition arose in the Chancery Court and the Delaware Supreme Court (“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.).

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 Court and the Board are without jurisdiction for this unlawfully brought petition. A judge is not permitted to waive his or her disqualification under section (b) pursuant to

The Delaware Supreme Court does not have jurisdiction to hear this unlawfully brought proceeding, which the Board must dismiss.

I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden ODC seeks to cause upon me from such defamatory title, “disabled,” embarrassment, emotional distress, lack of future employment, harm to my reputation if the Board does not dismiss this proceeding as unlawful, as applied to me brought by ODC and agents of the courts in retaliation against me for exercise of my First Amendment Rights by bringing an action to declare me “disabled” but for my exercise of my First Amendment rights.

I am standing up for my personal freedom to worship Jesus according to the dictates of my conscience, even if no one else shares the same beliefs, without government persecution.

The ODC and the Court agents knew or should have known that harassing, threatening, interfering with a party’s case, my case, motivated by disdain or animosity or disagreement with my religious beliefs, speech, petitions, association or poverty is a violation of the US Constitution and federal law

The ODC has exceeded the Constitutional bounds of the law in violation of 42 USC Section 1985(2), 1983, 1988, and the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

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Denied as it relates to the ODC's behavior as it relates to me. Defense of illegality. I object. Defendants knew or as attorneys, should have known violating my First Amendment rights by conspiring, harassing, interfering with a party in a case, me in my case, in an attempt to obstruct justice, and then punish me for exercising my first amendment rights exceeds the norms of a civilized society and violates the First Amendment applicable to ODC pursuant to the Fourteenth Defendant.

On an aside, the District Court Judge Connelly, cited the August 23, 2021 letter in his opinion against me, while failing to mention the Delaware Supreme Court pleadings the ODC cited in that same letter, the Delaware Supreme Court evidence indicating the Delaware Supreme Court or its agents appeared to have instigated the retaliatory proceedings against me based on the DE-Lapp's letter and requests for waiver of dues for lawyers out of work. See Exhibit 24 and Exhibit 32.

I am concerned when judges omit evidence to skew data, unintentional or not, misleading and deceiving the truth.

On an aside, I would like to think the Delaware Supreme Court through its members or staff contacted De-Lapp out of love and compassion for me based on my utter poverty and lack of resources. I think that the arms of the court went on vicious attack mode, not out of love, and improperly interfered during an active

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case with threats, possibly under the mistaken authority of a Delaware Supreme Court. That is what may have caused the Court to be prejudiced to be hard on me, and may be the reason for the court's refusal to address my second letter relating to attorney fees. My law suit and petitions relating to *Kelly v Trump* were not brought with malicious intents. I brought the suit *Kelly v Trump* because I love God. I did not want to be substantially burdened to miss out on a fuller type of love with God on the last day due to government incited pressures to sin by hiding my faith in Jesus. And importantly, I did not want people I love to be misled by the establishment of government religion to sin and be damned without eternal life, to be thrown into the fire. I love God, myself and others, and do not want any of us to be harmed and damned to hell.

On November 18, 2021, I contacted Court agents to participate in CLEs. None even responded back to me, acting as if I was no longer an active attorney. I was not able to attend the free CLE. See Exhibit 33 and Exhibit 34 (Exhibit 34 reflects the reason why I believe most people go to hell. They allow their love of money to drive out the love for one another and God from their hearts, and merely conditionally care based on relationship, rewards and avoidance of harm, which I believe is the mark of the beast, those without eternal life, not yet born of love.)

This disparate treatment towards me based on my petitions, poverty, religious beliefs, association and speech should end. This petition should be

dismissed. I object to punishment for Constitutionally protected conduct. I should not be blackballed because I believe differently than others.

**3. As a licensed Delaware attorney, Respondent is subject to the jurisdiction of the Supreme Court and the Board on Professional Responsibility; “The Court has inherent and exclusive authority to regulate and discipline members of the Delaware Bar.” *In re Abbott*, 925 A.2d 482 (Del. 2007) (Quoting, *In re Froelich*, 838 A.2d 1117, 1120 (Del.2003) 510 A.2d 484, 487, *Petition of Connolly*, 510 A.2d 484 (Del. 1986) (recognizing the Supreme Court’s “supervisory powers over the Bar.”). See also 10 De. C § 1906 and Procedural Rule 1(a).**

I incorporate my answers to the paragraphs above and below into this answer.

Denied, and I object to the jurisdiction of the Delaware Supreme Court (“Court”) and Board on Professional Responsibility (“Board”), as unlawful as applied to this petition in violation of Pursuant to 28 USCS § 455, (a) and 28 USCS § 455 (b)(1), and § 455 (b)(5). The Board and Court are without jurisdiction of this unlawfully brought action.

Denied and I object to the jurisdiction of the Court and Board. This petition must be dismissed. The ODC motivation is to discriminate against me for

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exercising my protected rights, based on disdain for my speech, petitions, religious beliefs, affiliation or poverty, motivated by malice to suppress my religious associated beliefs based on disdain for my unpopular beliefs in Jesus's words, and based on the ODC's desire to hide government misconduct or mistakes by seeking to declare me disabled, in violation of the Equal Protections clause and the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

I plead illegality as applied. This petition must be denied and dismissed.

Denied and I object and contest the PRC's and the Delaware Supreme Court's determination, based on the proceeding itself violating the Constitution, in violation of my First Amendment right to petition, speech, associate, exercise religious beliefs and petition the government for grievances without government interference and retaliation, motivated by malice to discriminate against me based on religious beliefs, exercise of rights, poverty and to cover up government misconduct or mistakes.

Denied, and I object, as applied to me in violation of the equal protection clause and First Amendment applicable to the Delaware Supreme Court ("Court") and the ODC pursuant to the Fourteenth Amendment as applied, against me, a party of one, based on illegality. This proceeding, brought under the color of the law, is brought for an unlawful purpose to discriminate against me for my exercise

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of First Amendment protected rights to speak, exercise religious belief, and petition the government for relief.

This case is unlawfully brought against me to retaliate against me for the exercise of my First Amendment rights, based on disdain for my religious affiliated beliefs, poverty, and or to cover up court mistakes or misbehavior. Grace, mercy and justice for correction, not condemnation should be the Court's, Board's and the ODC's aim, not retaliation during a global pandemic where many of our loved ones are getting sick and dying.

This proceeding is unlawful, and should be dismissed.

The Supreme Court's conduct is in issue relating to this case, as well as the staff of the Chancery Court, and the petition before the board should be dismissed for this reason too.

Denied as applied to this case, in violation of 28 USCS § 455 (a), 28 USCS § 455 (b)(1), and 28 USCS § 455(b)(5)(iv). I object.

“Any justice, judge, or magistrate [magistrate judge] of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.”

(b) He shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding.

During the second week of November as I sat in the Sussex County Law library, Delaware Supreme Court Justice Traynor came in, and asked for jury instructions for the federal court, obviously to use against me or to help another person such as members of the Chancery Court to use against me.

The Judge cannot be the prosecutor, judge and jury too.

This act, and the behavior mentioned in the above and below answers to the paragraph create the impression of partiality by the Delaware Supreme Court. Thus, this petition should be dismissed since the Delaware Supreme Court is without jurisdiction.

Additionally the judges of the Delaware Supreme Court are material witnesses to this petition. I am not permitted to ask the judges or their agents did you tell ODC and DE-Lapp of my request for relief from attorney dues? Why have I not received a response since Februaray 2021? Or any other material issue relating to this petition. The evidence shows I am deeply prejudiced by the Court and petition, which was wrongfully brought. I sought safety and protection from the Courts, only to be punished for asking for help.

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The Chancery Court was also without jurisdiction to issue equitable relief based on the fact impartiality may be questioned relating to facts in issue, same as the Delaware Supreme Court.

In *Kelly v Trump*, I suspected disparate treatment towards me by the Chancery Court based on religion, association, speech, petition and poverty in violation of the Substantive and Procedural Due process clause applicable to states pursuant to the Fourteenth Amendment, in violation of the First Amendment right to petition, associate, speak, exercise of religious beliefs regardless of license to practice law and utter poverty, and petitioned the Honorable Patricia Griffin for help. See Exhibits 26 and 27. The Honorable Master kindly afforded me relief. Exhibit 28, Exhibit 29.

A staff member sought to sabotage my case by misleading me to almost miss the filing deadline. Exhibit 2. The same staff member instructed me to cross off the civil process clerk's address, motivated by disdain for my religious associated beliefs reflected in the pleadings. Exhibit 4.

Exchanging first amendment rights for a license to make money, essentially selling my soul to hell, is not an exchange I am willing to make. My First Amendment right to worship God is not negotiable. I am a Christian and believe in God accessible through the father, son, Jesus Christ, and the holy spirit.

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While I defer to the authorities, when Constitutional, I do not have to agree with them. They do not control my freedom in the form of freedom of conscience, no matter how they pressure me to conform to their forced will under threats of social, economic or physical harm. It is unconstitutional to bend people's free will, freedom of conscience to the worship of the false God, business professional greed, prestige, pride or other evil sin that mislead many to harm and hell.

To my horror, I realized it appeared the Delaware Supreme Court was the only source other than Mark Vavala who knew of my request, my petition to the Delaware Supreme Court to waive active attorney fees for all attorneys' unemployed due to the pandemic, which spurred De-Lapp's attack.

The ODC quoted the Supreme court pleadings as a source of their petition. Exhibit 5. It appears the Supreme Court may have instigated or assisted in the retaliatory interference by the arms of the court in response to my exercise of protected rights. This petition must be dismissed.

**4. Procedural Rule 19 (c) requires ODC to investigate and initiate Board proceedings against a lawyer when there is "information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law" and it appears "the interests of respondent's clients or the**

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*public are endangered.*" Rule (c) (emphasis added). The Board proceedings are:

**To determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent's expense**

Denied and I object to examinations by medical experts, on religious grounds, and I object to paying for it based on poverty in defending my First Amendment liberties in this case, and based on religious grounds.

On Friday, November 6, 2021, around 6:00 PM, I was served this petition by the ODC seeking an order against me which would violate my faith in God by forcing me to undergo an examine me by a "qualified medical expert."

Such examinations violate my religious beliefs. I should not be required to violate my faith in God risking losing my eternal life to maintain my license to practice law. Lawyers should not sell their souls for potential monetary gain, to lose their eternal life in the hopes to pursue justice. (*Matthew 23:23, Amos 5:15, Matthew 16:26* "What good will it be for someone to gain the whole world, yet forfeit their soul? Or what can anyone give in exchange for their soul?," *Matthew 6: 24* "No one can serve two masters. Either you will hate the one and love the

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other, or you will be devoted to the one and despise the other. You cannot serve both God and money.” I choose God).

Defendants seek to declare my faith in Jesus a mental disability through official proceedings. What is next will they lock me up because my religious beliefs do not conform to their expectations.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds to the appointment of counsel and for costs too. I object and enter Denied herein for such appointment, and object to costs too.

Denied, unconstitutional as applied to me in violation of my religious beliefs. I objected to appointed counsel on religious grounds. 1. Going into debt violates my religious beliefs and 2. I believe God is my advocate in the disciplinary proceeding.

In *John* 14:26, Jesus taught, “the Advocate, the Holy Spirit, whom the Father will send in My name, will teach you all things and will remind you of everything I have told you.”

In *Mark* 13:11, Jesus taught, “Whenever you are arrested and brought to trial, do not worry beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

It is against my religion to allow an attorney advocate to defend my religious beliefs in the disciplinary proceeding. An attorney advocate is not in the position to stand up for my beliefs in the disciplinary proceeding.

With regards to exams and alleged mental health, I believe people lose eternal life for relying, performing, recommending and allowing the conduct of mere man to examine the will of another by examinations relating to alleged mental health, psychology or behavioral theory. I believe the mental healthcare industry teaches the way to hell guaranteed by tempting man to bend their will to their own desires or the will of the world, conditioning them to live conditionally, instead of laying down their will to love God unconditionally, and subordinately to love others, unconditionally, unearned, as yourself.

My religious beliefs are different from the worlds. The Board and the Court does not need to adopt my religious beliefs to uphold my First Amendment freedom of conscience against Government substantial burdens, retaliation and exercise of protected rights.

My beliefs are in issue in this proceeding. So, I am properly discussing them. I believe lost people seek happiness. Children of God seek holiness. The happiest people have hardness of heart. Since they are either ignorant of the evils of the world, or they do not care to love those who inconvenience them, which is

not violating Jesus's commands by organized charity or fundraising which I believe leads to hell. It is not referring people to government resources either. Love is sacrificing from self in secret to care for another at a worldly lose for a Godly gain. (*Matthew 6:1-5.*) (*Luke 10:25-37*)

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 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.

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Jesus teaches “blessed are those who mourn,” meaning mourn at sin, our own and the world’s, not blessed are the happy. (*Matthew 5:4, Hebrews 12:14,* “Be holy, without holiness no one will see the Lord.”) Rather they are in danger of damnation, without repentance for seeking their own happiness above God’s will. Even children go to hell per Ezekiel chapter 9 for their unconcern.

I believe children are trained, through psychology, to give into temptations young to make deceiving businesses money, learning to go to hell young by conditionally caring based on date for holidays and birthdays by societal conformed, operantly conditioned pressure which is not unconditional love.

I do not celebrate birthdates since birthdates arose from ancient rulers declaring they became a God at ordination, and declared worship and celebration of self, like Satan, putting self first. *Isaiah 14.* The Romans extended birthday celebrations to commoners and even women, who took a day off to celebrate self, as if every person was their own God, which I see as blasphemy. So, I do not partake in conduct I see as dirty. I love and respect others who believe and behave differently. I just do not participate in what I see as sin with this world.

Jesus teaches us do not adhere to the traditions of men at the cost of violating God’s law of truth in love. *Mark 7:8*, “Do not be conformed to the world.” I should not be conformed to the world in order to exist in the world.

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Romans 12:2. 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.” My different beliefs do not make me a threat, nor do they make me disabled. The fact I care more for God, and subordinately for humanity than money, material gain and merriment makes me a Christian.

Per my pleadings, I am a licensed teacher too. Most teachers learned psychology and behavioral theories predominantly B. F. Skinner (“Skinner”). Skinner taught there was no such thing as unconditional love, that people live based on conditional relationships (including societal peer pressure), reward and avoidance of harm. My God teaches me this is the mark of the beast, also called children of the devil, the whore, adultery with the world, violating the covenant of God, the lost, the unsaved, those not yet adopted by God. Christians are known by their love. (1 *John* 3:10) Love is unconditional, not merely living conditionally by conformed behavior, relationships, reward and avoidance of harm.

Children are taught in schools that listening is love. Through conditional operant theory children learn the lie love must be earned conditionally.

Accordingly, they examine whether someone earned an ear. They are discouraged from listening, learning. Thus they are tempted to become dumb and blind adults, who are less likely will be saved from hell, by seeking truth in all

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things, rather than ignoring it. (See, *Hosea* 4:6, "my people are destroyed from lack of knowledge.") (See, *Matthew* 13:13, *Deuteronomy* 29:4, *Isaiah* 42:20, *Jeremiah* 5:21).

I believe throughout the bible, we learn not knowing is guilt that damns people to hell. Christians are called to shed light to expose the temptations leading to harm and hell, not cover it up with more darkness by ignoring it. Ignorance is guilt to God. (See, *Ephesians* 5:11, "Have nothing to do with the fruitless deeds of darkness, but rather expose them.")

I also believe people will be thrown into the fires of hell for carelessly recommending, performing or requiring healthcare examinations and healthcare too, should they not repent. I believe our healthcare harms health and kills patients. God teaches he will destroy those who destroy the temple of God, which is people, empty of the holy spirit or not. They are loved by God.

I believe our healthcare harms lives and guarantees damnation in hell, by eliminating people's ability to use their brain, diminishing their faculties. They feel better by feeling nothing. I believe people must use their brain, their mind, to consciously choose to do God's will to love God and one another, not seeking happiness but holiness or their damnation is certain. I believe forced comas and drugs that inhibit people's faculties prevent them from going to heaven, and

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guarantee their damnation in hell, and the damnation in hell for the unconcern, of by standers, and those who ignorantly sell harmful healthcare. I believe the last day of people's lives seals their eternity.

I took a course at UD on healthcare, and studied healthcare law and healthcare finance at law school, due to my own personal bad healthcare experience. I drafted a newspaper article outlining how to amend the laws to care for patients, as opposed to sinning by exploiting patients to serve profit. See Exhibit 30. I also proposed a way to transition into universal care. *Id.* Healthcare brings in more money than any other industry in the world, wrongly by exploiting desperate conditions to get as much as they can for as little as they can, at the cost of loss to health, life and eternal lives. See, <https://www.worldometers.info/>. The second most lucrative industry is healthcare marketing under the guise of education, per worldometer.

Our laws reward profit and do not protect true treasures, people. Laws may be revised by legislative pen or by case law to care for humanity and improve healthcare for our elderly, the sick, and the common population without increasing monetary costs or throwing money at it, wrongly teaching money is God. Jesus teaches you cannot serve God and money. I believe those who focus on money as savior are not saved from hell regardless as to whether they are churches, businesses or not for profits practicing charity in violation of *Matthew 6:1-5*, which

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I believe leads to the sin of deception, hardness of hearts misleading many to lose eternal life to be thrown into the fire the last day at the resurrection of the dead.

I object. The ODC threaten me with the fires of hell by such examinations and costs. I did not exchange my eternal life for a license to practice law. I should not be forced to go to hell, violate my religious beliefs in order to maintain an active license to practice law.

Denied, as applied. I object. I am not currently practicing law, and there was no need for the ODC through its agents including but not limited to Judge Clark to use the cloak of the government authority, and color of law to impede, harass to pressure me to forgo on ongoing law suit on the most important issue of my life and eternal life, my ability to freely and openly exercise religious freedoms without fear or threat of government incited physical, social or economic persecution. My faith in God is more important to me than all the money in the world, and is more important to my than my license to practice law. I should not be forced to renounce my petitions and speech to protect my religious beliefs in order to practice law as the pandemic subsides.

Denied as applied to me, I object to paying any expenses relating to this petition, as I am in utter poverty and going into debt violates my religious beliefs.

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I am impoverished and going into debt violates my religious beliefs forcing me to focus on money as savior instead of God. The Bible teaches “Owe no one anything but to love them.” Jesus the Christ teaches you can not serve money and God. I believe people who make money their God allow unconditional love to be driven out of their hearts, replaced with conditionally caring based on relationship, reward and avoidance of harm, what I believe is the mark of the beast. I believe focusing on money as security in place of God, guarantees damnation in hell, without repentance.

Denied as ODC violates federal law and the Constitution, as applying this rule against me to force examination in violation of my religious exercise and beliefs pursuant to the First Amendment applicable to the ODC via the Fourteenth Amendment, brought with malice and disdain for my religious beliefs in retaliation for the exercise of my protected First Amendment rights.

Objection as to the manner of the investigation, and the unconstitutional purpose, the motive based on persecuting me for my religious exercise, and First Amendment rights. The ODC knew or should have known that interfering with an active case violates clearly established federal law. If the ODC had concerns, which I argue are not warranted, they could have waited until the case was over, instead of seeking to harass me or deny me access to the courts in violation of the procedural and due process protections under the Constitution and federal law.

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Instead, they made themselves and the Courts look bad, since the ODC behaved badly by interfering with my case causing me to petition for help.

Denied as applied to me. I am no danger to the public.

Denied as applied to me. I have religious opposition to mental health and physical health exams, and I object to the ODC's

While it is my religious belief people sin against God for fundraising, and organized charity through churches or otherwise as it violates Matthew 6:1-5 and teaches people conditionally giving seen is unconditional love, I believe God teaches secular laws that provide welfare are required. Welfare helps those in need without exploiting such need to serve greed by corrupt bought, not free partnerships with private entities, such as not for profits, businesses and entities called charities.

I am so poor that I am on food stamps, which I should have applied for before the pandemic. And I only have about \$200 in my checking account. I am utterly impoverished.

Secular Government Welfare, as opposed to charity, to care for individuals in need is commanded by God. See, *Deuteronomy* 24:19, "When you reap your harvest in your field and have forgotten a sheaf in the field, you shall not go back to get it; it shall be for the alien, for the orphan, and for the widow, in order that the

Lord your God may bless you in all the work of your hands.” See, *Leviticus* 23:22, ‘When you reap the harvest of your land, moreover, you shall not reap to the very corners of your field nor gather the gleaning of your harvest; you are to leave them for the needy and the alien. I am the Lord your God.’” *Ruth* 2:2-3 And Ruth the Moabitess said to Naomi, “Please let me go to the field and glean among the ears of grain after one in whose sight I may find favor.” And she said to her, “Go, my daughter.” So she departed and went and gleaned in the field after the reapers; and she happened to come to the portion of the field belonging to Boaz, who was of the family of Elimelech.” *Exodus* 23:11, “You shall sow your land for six years and gather in its yield, but on the seventh year you shall let it rest and lie fallow, so that the needy of your people may eat; and whatever they leave the beast of the field may eat. You are to do the same with your vineyard and your olive grove.” This allows the poor to pick up and gather the crops and sell them or use them for food.

**5. Respondent’s conduct over the last year during a lawsuit filed in the Chancery Court raises serious concerns regarding Respondent’s fitness to practice law.**

Denied, and I object to such mischaracterization. The Court’s conduct towards me raised concerns. So, petitioned for help, not desiring condemnation against them, just protection from abuse under the color of the law based on malicious intent to suppress my first amendment exercise based on disagreement

with my religious, association, belief and speech and petitions and that reflected those beliefs.

“The interference with and potential prejudice to the right of access to redress in state court rises to the level of a constitutional deprivation.” *In re Cincinnati Radiation Litigation*, 874 F. Supp. 796, 823 (S.D. Ohio 1995); Citing *Fisher v. City of Cincinnati*, 753 F. Supp. 681, 687 (S.D.Ohio 1990)

The First Amendment prohibits state officials, employees, and agents from retaliating against claimants, such as myself, for exercising their right to access to the courts.

“Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment.” *Zilich v. Longo*, 34 F.3d 359 (6th Cir. 1994), U.S.C.A. Amend. 1.

The ODC intentionally retaliated against me for the exercise of my right to access to the courts, based on their disagreements as to my speech, religion and association, and beliefs, I seek to protect, even the right to criticize government officials, including Delaware arms and agents, and to stand up for my beliefs, no matter how repugnant the Defendants or others find my beliefs.

Arline Simmons (“Arline”), a Chancery court staff member in the state of Delaware, was my friend, prior to impeding my case. At least, I thought she was

my friend in real life. Arline advised me telling her things would not get back to the court, and was not the court, when I came to the Courthouse in person, near the inception of the case. Arline was my friend.

Arline indicated her support for former President Trump and for the ability of the government to share religious beliefs through its employees, by her communications at the courthouse and online. My case, *Kelly v Trump*, seeks to dissolve government-religion, which conflicts with Arline Simmons beliefs. Arline, intentionally misled me to almost miss the deadline to file an exception to the Honorable Master's final report, in an attempt to prevent my case from going forward based on her disagreement with my religious, political beliefs.

I asked the Master for help. She kindly helped me. Id. at December 1, 2020 letter, my request for help, and District Court Exhibit 11, the Master Patricia W. Griffin's kind December 7, 2020 letter granting me relief

The representatives at the Chancery Court demeaned me apparently based on poverty, association, speech, and religious beliefs.

I experienced foreseeable embarrassment, loss of sleep, clenching of teeth, tears, humiliation, hurt and emotional distress as a result of the intentional retaliatory interference with my case to stand up for my free exercise of religion, speech and association without government suppression, manifesting in sleepless

nights, which were rare to me prior to this case, clenching of teeth, pain in my heart, and tears at the betrayal of someone I cared about.

Arline also instructed me to cross off the address of the civil process clerk, the Delaware local counsel in *Kelly v Trump*, with the intent to prevent the case from going forward based on covering up her misconduct and based on her belief in Trump-religion, both in violation of my first amendment rights

My inability to serve the US Attorney General David Weis in the District of Delaware, caused great anxiety, confusion and distress. When I discovered the address crossed off, I became heart-broken because I still care about Arline outside of the court case.

Arline also kindly offered to allow me to email her documents so I would not have to drive to the library to print documents. She appeared to have the authority during this pandemic to do so. So, I accepted her kind help to keep us safe, especially since the Defendant former President Trump had contracted Covid-19, and I incorrectly thought the US Attorney General William Barr did too.

Another Court representative Katrina Krugar indicated Arline and I should stop Emailing, and all communications should be done through Katrina's email instead, during these confusing times of covid 19. Arline and I both complied, temporarily as covid 19 continued to wreak havoc on the skeletal court staff that

held up the Chancery Court in person, and I filed a Notice of Exception to a Vice Chancellor, who works with different court staff.

In addition, the ODC impermissibly interfered with this case by contacting Judge Kenneth Clark, per Judge Clark's admission, to interrogate me as if I was on trial for exercising my right to petition the Court to safeguard my freedom to worship Jesus Christ without government incited persecution, substantially burdening my exercise of my religious belief. In April 2021, Judge Kenneth Clark ("Judge Clark"), a Court of Common Pleas judge for the state of Delaware judge appeared to threaten me at a local BJs in Millsboro, Delaware, a bulk grocery store, while acting under the color of judicial and state authority, as if I was on trial for standing up for my faith in Jesus, solely based on retaliation of my exercise of seeking judicial relief in court for petitioning the court to alleviate the government sponsored burden government-religion has caused on my exercise of religion in the action *Kelly v Trump*. It is improper and unlawful for state actors, especially judges to pressure a party in a case to drop, interfere or impede or prevent my access to the courts.

The ODC and Judge Clark clearly violated and encouraged the violation of my first amendment right to petition the courts, by seeking to use their government power, under the color of statutory or regulatory law to obstruct my case, and to retaliate and punish me for bringing my case.

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The Supreme Court's two-step Saucier analysis governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015)

Judge Clark and the ODC knew or should have known that seeking to use his cloak of government authority, under the color of regulatory law, as a respected, fair judge to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure, violates my First Amendment Right to petition the Court, and arguably my fundamental right to speak, exercise of religion, and associate relating to my communications in my pleadings in *Kelly v Trump*, and communications in general.

My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right.

“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); See, *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) (“In the performance of assigned constitutional duties each branch of the Government must

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initially interpret the Constitution, and the interpretation of its powers by any branch is due great respect from the others").

I will suffer continued irreparable harm if this petition is not dismissed.

'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)).

I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden ODC seek to cause upon me from such defamatory title, "disabled," embarrassment, emotional distress, lack of future employment, harm to my reputation if an injunction is not granted to prevent the Defendants from retaliating against me for exercise of my First Amendment Rights by bringing an action to declare me "disabled" but for my exercise of my First Amendment rights.

I am disappointed in Judge Clark, and have high regards for him, but he knew better, as Arline knew better, De-Lapp knew and the ODC knew better than to obstruct and impede and seek to prevent my access to the courts in violation of clearly established law, the first amendment. "A Government official's conduct

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violates clearly established law when, at the time of the challenged conduct, ‘[t]he contours of [a] right [are] sufficiently clear’ that every ‘reasonable official would have understood that what he is doing violates that right.’” *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015); Citing, *Ashcroft v. al-Kidd*, 131 S.Ct. 2074, 2083, 179 L.Ed.2d 1149 (2011) (quoting *Anderson v. Creighton*, 483 U.S. 635, 640, 107 S.Ct. 3034, 97 L.Ed.2d 523 (1987) (all alterations in original)). “In determining whether a right has been clearly established, the court must define the right allegedly violated at the appropriate level of specificity.” Id. Citing, *Sharp v. Johnson*, 669 F.3d 144, 159 (3d Cir.2012). The Defendants obstruction of my access to the courts and retaliation against me for seeking to petition the Court concerning civil rights is clearly violating my First Amendment rights to petition the court. “The opportunity to be heard is an essential requisite of due process of law in judicial proceedings” *Richards v. Jefferson County*, 517 U.S. 793, 798 n.4 (1996).

I wrote a letter to directed to the Honorable Chief Justice Collins J. Seitz, Junior of the Delaware Supreme Court (“Chief Justice”) under the suggestion of Mark Vavala, a former commissioner, and agent of the Delaware Bar Association, seeking a waiver of attorney registration fees during the pandemic, as the pandemic prevented me from working at my old law firm

“On February 2, 2021, the court sent a letter indicating:

“The Court acknowledges receipt of your letter dated January 7, 2021, wherein you request that the attorney registration fees for lawyers out of work due to the pandemic be waived. Attorneys wishing to have an assessment fee waived must file a formal request. The Court will take each request under consideration as received and act appropriately.”

On February 5, 2021, I responded to the Court’s February 2, 2021 letter in

part:

“...is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the states agencies, even the courts via the 14th Amendment, disparate treatment within a class. I am likely not the only one out of work due to the pandemic. Others are struggling too. A case by case determination would likely be per se unconstitutional. I will likely never have standing to stand up for those similarly situated with myself. Yet, if I made such a request, I would be asking the Court to treat me with preference instead of impartiality as required by law. My conscience may not allow me to make such a request, tempting this Honorable Court to misbehave to serve my own gain. I can however, request that all fees for attorney registrations be the same regardless of years barred. So, I am making such a request for future consideration for 2022 and beyond. Please treat all lawyers the same by requiring the same lawyer registration fee for every lawyer, without persecution towards lawyers with more years of experience by an increased fee. There is no rational basis for an increase in lawyer’s fees based on number of years, except the desire for more money. It is wrong to assume the longer you have been barred, the more money you have or must pay. I am saddened when I see unjust decrees and policies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves...” US Ex-Ex-A-5

I paid the filing fees for my active attorney license to practice law on February 6, 2021 in the amount of \$353.00, since no relief was granted by the court, per my request.

After such fees were paid, De-Lapp, a disciplinary arm of the court, so tied with the government it is considered a government agent, reached out to me offering to allegedly help, in the attached, May 24, 2021 attack letter.

In the May 24, 2021 Carol Waldauser and Eleanor Kiesel state, “We understand that you are experiencing some financial difficulties with regard to license fees.” They did not reach out to me to offer economic help since such fees were already paid, but to connive to gather evidence to retaliate against me, punish me, for my exercise of my first amendment rights. I made my request to suspend attorney license fees, the Delaware Chief Justice Collins J. Seitz, Jr. (“Chief Justice”). The Honorable Chief Justice may have discussed my letter with the other members of the Court, including judges.

I filed Appellant’s motion for the Delaware Supreme Court to reign in its arms through its agents unlawfully pressuring Appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, dated May 25, 2021, with the Delaware Supreme Court, with no relief from the Court.

It appeared the Chief Justice or a member of the Delaware Supreme Court contacted the ODC.

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A judge should not interfere with a party's case, my case or intimidate a party, intimidate me, or give the appearance of interfering or intimidating a party, me, before his court with knowledge that such interference would violate my First Amendment rights, my right to petition, exercise of speech, association and exercise of religion, based on my exercise of my right to petition the court to address grievances, including but not limited to the right to petition the Court for exemptions for attorney fees, the right to petition for relief from the arms in its charge to prevent an unfair trial, and the right to petition the court against grievances in *Kelly v Trump*.

It is the right to petition for relief without government retaliation that must be protected, not the guarantee that such relief will be granted. It is the opportunity at justice that must be protected and not taken away based on retaliation for the exercise of the right to petition, not taken away based on the exercise of speech, religious beliefs, or association, or even based on poverty, and the lack of resources an attorney advocate would ordinarily have if she should be representing a party, or even errors, or mistakes.

Perfection is not a requirement for an American to have the right to petition.

My speech concerning my beliefs and faith in Jesus may appear crazy to others, and yet even unpopular beliefs are protected. *Cantwell v. State of*

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*Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the government through its agents believes. See *Matthew 6:1-5*. Also see, *State ex rel. Tate v. Cubbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, \*1, 58 Del. 430, 433, (“It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings.”); See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025, 1981 U.S. App. LEXIS 16448, \*1, (3d Cir.), cert. denied, 456 U.S. 908, 72 L. Ed. 2d 165, 102 S. Ct. 1756 (“It is inappropriate for a reviewing court to attempt to assess the truth or falsity of an announced article of faith. Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy. However, while the truth of a belief is not open to question, there remains the significant question whether it is truly held. Without some sort of required showing of sincerity on the part of the individual or organization seeking judicial protection of its beliefs, the U.S. Const. amend. I would become a limitless excuse for avoiding all unwanted legal obligations.”); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, 134 S. Ct. 2751, 2759, 189 L. Ed. 2d 675, 680, 2014 U.S. LEXIS 4505, \*1. (“Courts have no business addressing whether

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sincerely held religious beliefs asserted in a RFRA case are reasonable.”); Employment Div., Dept. of Human Resources of Ore. v. Smith, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). (“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, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that “the First Amendment forbids civil courts from” interpreting “particular church doctrines” and determining “the importance of those doctrines to the religion.”); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, 194 L. Ed. 2d 231, 235-236, 2016 U.S. LEXIS 991, \*10-12. See, *Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856, 190 L. Ed. 2d 747, 747, 2015 U.S. LEXIS 626, \*1, 83 U.S.L.W. 4065, 93 A.L.R. Fed. 2d 777, 25.

I am allowed to think differently instead of being conditioned to worship as the state’s forced will of materialism, pursuit of money, and unholy charity that damns people to hell per Jesus, such as fundraising or organized charity. Jesus teaches people “have their reward,” meaning they have no reward, no eternal life from God. *Matthew 6:1*. I believe organized charity, fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business, giving out of one hand to get out of another, is love. Love is

unconditional. Business is not the sin. Teaching business is charity is the sin by driving love, God, out of the hearts of men replacing it with the love of money. Jesus teaches you cannot serve God and money. I choose God.

I believe churches taking government money to perform business on behalf of the government per the executive orders I sought to eliminate in *Kelly v Trump*, under the guise of charity mislead people to hell as they harm others on their way should they not repent, by teaching business is love, driving out love ("God," since "God is love"), from the hearts of men replaced with the love of money or material gain. Jesus taught, do not give charity seen like the hypocrites who will have no reward from the father, meaning they will be damned to hell, without eternal life. When you give do not know your left hands from your right, meaning do not give to get, no matter how slight, in the form of favors, tax breaks or marketing, and your "father will reward you in secret," meaning you will escape being thrown into the fire to be no more on judgment day.

My personal beliefs and speech relating to those beliefs do not make me disabled. I believe people go to hell for trusting in what mental health employees and healthcare employees sell. I have religious objections to mental health care and healthcare.

I am a Christian. I believe people go to hell for trusting in what psychologists, mental health professionals, psychiatrists and behavioral theorists teach, which often is focused on being happy or productive materially instead of being holy. The organization premises its existence on mental health theories which I believe harm people. I believe such theories teach patients to seek to fulfill their own material desires instead of doing what is right, thereby teaching people to reflect a little piece of hell on earth, the image of Satan by living for self, conditionally caring based on relationship, reward and avoidance of harm with no sacrificial unconditional love or God in them, teaching a lie that damns. See *Isaiah* 14 to understand how Satan wanted to be his own God, as high as God, to place self-first. I believe their thinking misleads patients to hell, especially Bf Skinner's theories, which most teachers, including myself learned. These mental health professionals focus on misleading people to feel good, not be good, which is not good. I believe it is evil, misleading those they exploit for a paycheck to harm and hell.

Carol Walhauser created the appearance of a threat by her comment requiring a response within ten days. I have the freedom to chase after God's will instead of chasing after money.

I have the freedom to pursue my religion by justice in the courts to protect my freedom to worship by the dictates of my free will, not the forced will, not the

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dictates of the state through its agents to worship money, as savior, which I believe leads to damnation in hell. I believe business greed, and conditionally caring based on relationship, reward and avoidance of harm, without any unconditional love, is the mark of the beast. Jesus teaches you cannot serve God and money. *Matthew 6:24, 1 Timothy 6:10.* I stand by God.

Psychological examinations, which violate my religious belief as I believe psychologists and mental health professionals will go to hell along with those they treat by seeking to bend people's free will to conform to the desired will of the world by giving into temptations of desires instead of laying down desires to do God's will.

I believe mental health specialists, behavioralists like B. F. Skinner, and psychologists teach the mark of the beast and will be damned to hell, as they mislead others, including their patients there with them, should they not repent and be saved with the truth.

I believe Mental health counselors, behavioralists and psychologists teach *people* to conditionally care based on feelings, relationship, reward and avoidance of harm, based on desires, not laying down desires to love God and one another.

Please note, Jesus teaches most people will go to hell. See *Luke 13:28, Matthew 7:13-15*, also see *Isaiah 10:22*. Only a remnant of Israel is saved from

destruction in hell the last day. Wide is the way to destruction, meaning many different thoughts, action and inaction may forever damn people to hell, should they not repent, be made clean and saved by truth in love, instead of lusts, making.

Where false accusations arise in retaliation for complaints against authority, reputations may be tarnished to conceal mistakes and misbehavior by those in power as the Board of Bar examiners did to protect their private partner at Widener Law School, and as the Defendants are doing towards me in retaliation for my petitioning the Court for relief. See, *Acts 24:5*, Paul was called a troublemaker for shining light on evil, on sins, just like Jesus was persecuted for shedding light on darkness, sins, in hopes to transform darkness into light. As I hope the courts choose to do in all cases, repenting when they make mistakes, reflecting the image of God by saving not only lives, but eternal lives too by love and correction to prevent condemnation, instilling hope “70 times 7.” *Matthew 18:22*.

The government threats by Delaware government officials, Judge Clark, De-Lapp, ODC, Patricia and the ODC conspiring to seek to suppress my free exercise of religion, speech, association, and right to redress grievances, under the facts of the case., but for my petition for grievances violate the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, and caused emotional distress.

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The threats continued. On August 23, 2021, the ODC attached a letter to an Email, which I have not received by US mail, signed by Defendant Patricia B. Swartz, stating:

“This Office has reviewed several pleadings you have filed in the Court of Chancery and the **Supreme Court** in connection with the law suit Meghan Kelly v. Donald Trump. The content of these documents raise serious concerns as to your mental fitness to practice law... Therefore, the ODC requests you voluntarily submit to a mental health examination to determine your fitness, and mental capacity to practice law. This Office has scheduled an examination with Joseph C. Zingaro, PH.D., located at 1129 Airport Road, Milford, DE 19963 on Tuesday September 7, 2021 from 1:00 p.m. to 4:00 p.m. If you do not submit voluntarily to the above referenced examination, the ODC will petition the Board to order such an examination.” District Court Exhibit 21.

I responded to the ODC’s E-mail dated August 23, 2021:

“Desist in contacting me to interfere in my case. No, I will not be evaluated. I have religious opposition to mental healthcare and healthcare. Do not interfere with my case any further. I am trying to file a writ of cert as we speak. Stop impeding justice, to bend my freedom of conscience to your will. My belief in Jesus may appear to be crazy to you, but my freedom to believe as I choose is a protected right, same as the... right to an unobstructed trial. Desist in contacting me.”

I rushed to the law library to file my writ of certiorari to the United States Supreme Court relating to *Kelly v Trump* the same day, August 23, 2021, with some errors, under great duress, since I believed the August 23, 2021 letter was meant to discourage and distract me from appealing the Delaware Supreme Court’s determination before the United States Supreme Court.

I tried to get on the internet at the law library, after I electronically filed, and my lab top stopped working, that day, August 23, 2021.

I filed Kelly v Trump as an aggrieved party, despite my poverty and lack of resources for expenses such as a phone, working computer, gas, printing, paper, and legal tools, because standing up for my free exercise to worship God without government sponsored suppression was and is risking mistakes.

I am reasonably scared for my life. People have been killed based on perceived government-religion and government-religious beliefs. I live in a pro President Trump area, where some people see him as God's anointed, and see me as a "demoncrat." or antichristian, since I do not support former President Trump, and because I am a democrat.

A stranger talked about shooting me based on stickers I had on my car that indicated "No one is above the law. No one is below the law," and "Impeach," to impeach former President Trump. Someone actually threw a substance all over my car and stickers. An out of state stranger, proclaiming to be from Maryland, took off his mask and yelled at me, while getting uncomfortably close, accusing me of supporting President Biden. I feared he was potentially subjecting me to covid19. I did not know how an out of state stranger knew I did not support President Trump. I thought it might have been because I proposed five separate articles to impeach

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former President Trump on and contacted all 541 federal members of congress concerning the articles.

I have been visibly shaken up by the court's attacks and interference in *Kelly v Trump* particularly Arline, Judge Clark, DE-Lapp, and now ODC based on my exercise of speech, religion, association and petition.

Seeking to trivialize my requests to be free from retaliatory behavior by government officials for exercise of my right to petition, freely speak, exercise religion and associate, by demeaning my character as mentally unfit for the practice of law, is an improper purpose for the ODC to interfere in an active case regarding fundamental rights, with no important justification.

The ODC intentionally threatened me with the August 23, 2021 letter to interfere with my appeal, by distracting me, causing alarm, in retaliation for the exercise of my speech, religion, association and right to petition the court.

The ODC knew or should have known *Kelly v Trump* was an active case, and that conspiring to interfere with a party in an ongoing case to obstruct justice is unlawful as violating the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment. According to the US Supreme Court Docket relating to *Kelly v Trump* 21-5522, my petition was not even going to be

distributed for conference until October 29, 2021, the last business day of the month.

There was no great threat to an important government interest, narrowly tailored to address such interest, that justified the ODC's conspiracy to interfere with my active case that justified infringing upon my fundamental right to access to the courts.

In fact, there is little government interest the ODC has other than to destroy my reputation and credibility, based on my speech, religion, association, which at times is critical of government agents.

I was so upset, on August 28, 2021 I E-mailed Patricia, Mr. Zigaro, and Ms. Burskirk,

“This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for the writ of cert., relating to emotional damages related to the President’s conduct. Desist impeding in my access to the courts without government obstruction and retaliation for my exercise of my first Amendment rights. I am an injured party, not an attorney practicing in this case. A Court staff member sought to sabotage my case by misleading me to almost miss the filing deadline to appeal the Master’s final report, dated November 2, 2020. That same staff member instructed me to cross off the civil process clerk’s address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing. Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful.

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

Thank you”

On September 27, 2021, Patricia and the ODC again threatened to take action to place me as inactive, disabled attorney status, in retaliation against me for the exercise of my First Amendment right to free speech, to freely exercise my religious belief, association and to petition the government for redress of grievances and in direct violation of the First Amendment right to petition the government.

In the attached letter, dated September 27, 2021 Patricia and Defendant wrote:

“By letter dated August 23, 2021, this Office advised you of its concerns regarding your fitness to practice law. As such, the Office of Disciplinary Counsel requested you voluntarily submit to an examination with Joseph C. Zingaro, Ph.D. You declined and the examination has been canceled. I am writing to notify you, pursuant to Procedural Rules 9(b) and 19(c) of the Delaware Lawyers’ Rules of Disciplinary Procedure, that on Wednesday, November 3, 2021, this Office will present to a panel of the Preliminary Review Committee (“PRC”) a petition to transfer you to disability inactive. You may, if you choose to do so, send a written statement to this Office for submission to the PRC. Any such written statement must be received by this Office no later than the close of business on Tuesday, October 26, 2021. If we do not receive your submission by the deadline, it will not be sent to the PRC in advance. This matter is serious, and you should consider retaining counsel.” District Court Exhibit 25.

I am sought relief from the Delaware courts for protection against government retaliation for my free exercise of religion, speech and association, only to my shock to be persecuted for the same by retaliation by the government agents for the exercise of my fundamental rights. This is a traumatic for me to ask for help only to be penalized, as a result of my petition.

The ODC, Judge Clark, and DE-Lapp's behavior would deter an ordinary, reasonable person from continuing their lawsuit, despite the fact it did not stop me, albeit it shook me up and caused me to rush with more mistakes.

The fact that I am undeterred from the exercise of my constitutional rights does not eliminate the right to a fair trial without government attacks. See, Mirabella v. Villard, 853 F.3d 641, 650 (3d Cir. 2017)

Per Adams v. Ross Twp., No. 2:20-CV-00355, 2021 WL 972520, at \*5 (W.D. Pa. Mar. 16, 2021),

“The Third Circuit has held that ‘[w]hether an act is retaliatory is an objective question.’ (citations omitted) To determine whether an act is retaliatory, a court therefore assesses ‘whether the act would deter a person of ordinary firmness, not whether the plaintiff was deterred.’ (citation omitted) As the Mirabella Court explained, there is good reason for this objective rule: Government officials should not be rewarded for “picking on unusually hardy speakers””

I am firm on my belief in Jesus and the right to freely and openly exercise my faith without fear of government incited violence to my person, economic

harm, or social harm. I believe Courts are what keep many civilized, so long as the individuals within the courts look at people with love, not look at the price tag of cases or money. I believe Courts have the power to save lives and eternal lives through words of truth, guiding the misguided, with mercy, healing and hope, not condemnation. I believe the Courts are our hope of a hero in these troubling times.

The ODC's conduct would objectively deter a party from continuing suit, which I brought to prevent government suppression of my religious exercise, free speech and fundamental right to associate, while maintaining my individual liberties, including the right to redress grievances in a court of law.

The ODC, under the color of statutes and the law sought (seek) to deprive me of rights, privileges and immunities secured by the Constitution and laws, including my freedom to worship by the dictates of my conscience without government suppression and persecution, free exercise of association, free exercise of speech, and the right to redress government grievances in Court without outside government persecution by those wielding government power, and my active license to practice law. It is unconstitutional to conspire to impede access to the courts and to impair a fair trial, as the ODC has done.

The Defendants conduct seeking to place me on inactive disability status would prevent me from gaining employment with my old law firm or other firms,

causing irreparable harm to my reputation, my livelihood, and my quest to serve God by proposing just laws and policies to care for people, not exploit or oppress people to serve artificial entities without hearts who run on money and conditional labor, with no power to do good, as I believe only individuals can reflect the image

My personal religious beliefs are in issue. So, I am providing additional facts concerning my religion, and my beliefs. I am a Christian. I believe in God, the Father. I believe in God the son, Jesus Christ. I believe in God the Holy Spirit. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy Spirit, to shed light, to guide us to eternal life, regardless of whether we reject his love, in the form of his guidance to save us from the final death.

I believe we all are empowered to choose to accept or reject God, to accept God in our hearts, or harden our hearts to God's love and salvation from the final death through God's teaching us the way of love leading to eternal life.

I find guidance in Jesus, the Word made flesh. I find guidance in the Holy Spirit. I find guidance in God, the father. I find guidance in the Bible.

Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, *Matthew 23:11*). Accordingly, living to serve self is not great. In fact, I believe the root of corruption in both business and government is serving those

who serve you, thereby serving yourself, instead of the people you are supposed to serve. (Also see, *Matthew* 20:26 and *Mark* 10:43, Jesus says, ““whoever wants to become great among you must be your servant””); (Also see, *Luke* 22:26, Jesus teaches, ““But you shall not be like them. ... (T)he one who leads like the one who serves.””)

I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, *Isaiah* 14:13-14, Satan wanted to conditionally live for himself. He wanted to be his own God, to be as high as God. Satan did not want to lay down his life for God, by in part, loving others as himself, even outsiders, even the least of these.); (See *Genesis* 3:1-6, Satan tempted Eve to be like her own God too, allegedly “knowing good from evil,” to reflect the image of Satan, instead of placing God first by obeying God. God loves her and desired to prevent harm towards her. The command was for her benefit, like the commands are for our benefit to teach us the way through love to escape death. She died.); (Please see, *2 Corinthians* 4:4, and the *Book of Job*, Satan the lower case “god of this world” has authority to confuse humanity, through people, desperate conditions and the worldly desires, to teach people evil is good and good is evil. So, folks will be damned to hell for their misunderstanding.); (See *Matthew* Chapter 13, Only those who understood were not burnt up to be destroyed.

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Misunderstanding may eternally kill you.); (Also see, *Matthew 4:1-11*, Satan tempted Jesus to live for self too. Jesus did not give into the temptation but lived to serve, God and humanity by being the light of the way to eternal life); (Also see, *Ezekiel 16:49*, People will be damned to hell for their unconcern "they did not help the poor and needy."); (Also see *Matthew 13:18-19* "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, *Luke 17:26-34* where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, *Matthew 7:21* "Only those who do the will of God, go to heaven.); (Also see, *Matthew 16:24*, *Luke 9:23*, *Matthew 10:38*, and *Mark 8:34*, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

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

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sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life. I believe the ODC sins against God when they look after their own interest, the interest of the reputation of the Delaware bar, or money, instead of the people they are charged to care for, including the bar, not exploit like products in a factory line. I believe people are priceless, irreplaceable, worth more than all the money in the entire world, not price tags.

I believe artificial entities without hearts, like the ODC, entity, per se, reflect the image of the devil, by absence of love, running on conditional labor, regardless of whether they are paid or not, or money, based on conditional collective entity interest with no power to do good by reflecting the image of God by unconditional love. People within the entities such as the ODC, are stronger than the conditional conformed will of the whole, since they have free will, to think, to care, to love unconditional, beyond the organizations', conditional existence, and conditional collective will, not free will.

The members within the such as the DOC, and Delaware Bar association have a conflicts of interest which tempts them to reflect the image of the devil by placing self-first, their collective, conditional uniform interests first, reputation of partners, the courts, their salary, their families, their colleagues, their convenience, or their reputation above doing what is correct by examining facts impartially, and

by intentionally or recklessly impeding my case with intent to obstruct my case and with intent to punish me for their disagreement with my speech, association, religious beliefs and requests within my petition, unlawfully violating the First Amendment applicable to Defendants pursuant to the Fourteenth Amendment.

Satan wanted to be as high as God, not leading by sacrificing to self to serve God foremost and one another, as self. *Isaiah 14.*

Over the years, I have recognized that the members of the bar organizations sections tend to look at proposed laws with the mind set of what will be easier for lawyers, what will bring lawyers more money with less work, what gives lawyers more freedom, less regulation, instead of doing what is right by looking to care for the best interest of the people we are charged to serve upon acceptance of work, real estate settlements or cases.

This inherent conflict of interest of self-first mindset, of members or partiality towards perceived partners, even the courts, within our professional organizations, collectively diminishing the free will of individual members to a conditioned will to form across the board professional standards, stifling innovation created by something more valuable than money, the minds of the individuals. So professional standards guarantee worse for consumers, and harsh penalties towards professionals who care to use their conscience mind to care for

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consumers and the public outside of the standards, stifling free debate to improve, by the forced will of professional standards.

Individual liberties are lost to artificial entities without hearts and souls who exist based on conditional labor and money, not unconditional.

The ODC and the Preliminary Review Committee has a conflict of interest to hide misbehavior and misconduct by their partners or conspiring complainants, the courts, instead of upholding the impartiality of the courts and preventing abuse by allowing government agents to knowingly or with reckless disregard impede justice in my case and punish me based on my religious beliefs, association, poverty, even as a destitute attorney, and my petitions for relief to protect my free exercise of religion without government suppression, to protect my right to petition without government obstruction, or punishment based solely on those rights, and to protect my right to petition the court for relief, suspension of attorney filing fees.

I am objecting to the ODC's investigations during my active case based on violation of clearly established law. Denying the statement in this paragraph, as applied. Objecting based on illegality, in violation of my First Amendment rights applicable to the ODC pursuant to the Fourteenth Amendment. Should there have been any legitimate concerns by the ODC, such investigations should have been conducted in a manner so as not to infringe with the exercise of my right to

unobstructed access to the courts, and without procedural due process, and substance due process violations, motivated by malice related to my religious exercise, speech, petitions, association and, or poverty.

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

ANSWER: Admitted.

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

**13. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the**

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

14. In addition, I believe Trump misleads people I love to hell by creating the illusion his government authority is backed by God, or he supports the God I serve, by conduct discussed herein, thereby causing some people to think my God is not perfect or holy or even real. Since Defendant sins against God and man. Defendant is not perfect. Thus, Defendant is turning potential believers away from salvation from the second death. (See, Leviticus 20:26, God says “be holy because I am holy”); (Also see Matthew 5:48, Jesus commands, “Be perfect as your heavenly father is perfect,” with regards to unconditionally loving people outside of your own, even your enemy.)

(Respondent’s Second Amended Complaint filed in the Court of Chancery, attached as Exhibit A).

My goal is for this Court to pull out the roots of unrest, the weeds of greed stemmed under the guise of religious freedom, when it is whoredom, by barter or exchange, business, not freedom, at the cost of something more precious than money, my, and my fellow Americans’ freedom to worship or not according to the dictates of our own conscience without government-sponsored persecution, based on established government religion

I believe the Executive Orders tempt churches to partner with government in a bought, not free union of government-religion to serve Satan by chasing after money under the guise of God, as they exploit the needy to serve the greedy, including their own greed. God teaches us

**“to seek the kingdom of heaven first,” that we “cannot serve God and money, and “that the love of money is the root of all evil.” Citing Matthew 6:24-33, and 1 Timothy 6:10.**

**My God is not for sale for government gain. My God is not a whore for government officials to exploit like a high school mascot rallying behind their own glory and self-gain in government under the guise of Godliness, essentially making themselves their own gods, reflecting the image of the devil. See Isaiah Chapter 14, to see how the evil one misbehaved by seeking to make himself his own God.**

**(Respondent’s Opening Brief filed in the Delaware Supreme Court, at 28-29, 32, attached as Exhibit B).**

ANSWER: Denied, I object.

My faith in God through the father, Jesus, and the holy spirit are in issue my complaint *Kelly v Trump* relating to the former President Trump’s and current President Biden’s establishment of government religion causing a substantial burden upon my free exercise of religion under a RESPA action, and are in issue, as the motive, an improper motive to suppress my religious exercise, speech, association, and petitions of in the ODC’s petition before the Board Case No. 115327-B per ODC’s admission. At paragraph 7.

The ODC wrongfully brings this petition 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. They assert they “are objectively illogical; and rely on non-legal sources, including the Bible.” Other lawyers have properly cited Bible verse in religious cases to prove religious beliefs

as facts. I have lost the copies of the briefs evidencing this when my computer crashed on August 23, 2021. The ODC, the Court and the Board have no place to determine whether my beliefs make sense. They are required merely to determine whether they are genuine religious beliefs protected under the First Amendment. Object, irrelevant.

The US Supreme Court held, in *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. “Courts have no business addressing whether sincerely held religious beliefs asserted in a *RFRA* case are reasonable.” My claims against Presidents Trump and Biden, and the Defendants’ wrongful action against me relate to my pleadings in *RFRA* action *Kelly v Trump*. (Emphasis intended).

Accordingly, the ODC and the Board have no business addressing whether my beliefs in the *RFRA* *Kelly v Trump* are reasonable. Also 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.”); *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.”).

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

Additionally, I do have typos. I have had limited ability to access working computers and printers at the time, and had to print out what I could when I could, with typos and all.

I am bad at secretarial work like typing. Yet, I had to run to a print shop, staples and the library to get pleadings printed. Being a poor type writer does not make me mentally disabled or unfit to be a lawyer. I did not become a lawyer to push papers, but to push hearts to look at others with love.

With the limited resources I had, I made do under the circumstances. I believed swift leadership was required, not worldly perfection.

My compassion for humanity and ability to look at solutions, other than money, makes me a conscience reasonable thinker, not a controlled, conformed, conditioned widget for man to exploit for money and material gain.

**8. Based on its concern regarding Respondent's mental fitness, ODC requested Respondent voluntarily submit to a mental health examination to determine her fitness and mental capacity to practice law.**

Answer: Denied, with regards to any legitimate concern regarding my fitness to practice law, as the proceedings are unlawful and are brought maliciously, in retaliation of my exercise of right to petition the courts, free exercise of religion, speech, association, motivated to discriminate against me based on religious beliefs, protected speech, First Amendment exercise of the right to petition, association and poverty.

Admitted that the ODC made a request on August 23, 2021, per their admission, based on review of information from the Chancery Court and the *Delaware Supreme Court*. (Emphasis intended).

**9. Respondent refused stating: “No, I will not be evaluated. I have religious opposition to mental health and healthcare...” (Respondent’s 8/23/21 email to ODC attached as Exhibit C) and “This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for writ of cert, relating to emotional damage related to the President’s conduct.” (Respondent’s 8/28/21 email to ODC attached as Exhibit D).**

ANSWER: Admitted, and I emailed Patricia my US Supreme Court filings so she may confirm.

**10. Respondent's words and filings in Delaware courts constitute reasonable grounds to believe Respondent is unfit to practice law, unfit to represent the interests of any clients, and pose a danger to the public and the administration of justice.**

Denied, I object. I pose no threat to the public. I am a helper by seeking just laws that care for people, not unjust laws which focus on money and jobs, which exploit people for self-gain, increasing desperate conditions instead of alleviate them, creating involuntary servitude.

I believe people will go to hell for teaching giving people a job is charity, love or good, when it is merely giving to get, even referring business to buy loyalty or favors. In Romans 4:4, God teaches “Now the wages of the worker are not credited as a gift, but as an obligation. Now to the one who works, wages are not credited as a gift but as an obligation. When people work, their wages are not a gift, but something they have earned.” I believe people can be made clean and repent of sins that I believe damn them and those they mislead to hell like teaching business is love or charity.

I believe leaders should be servants that protect individual freedoms, without behaving like tyrants by seeking to control and bend the free will of others to conform to their controlled, operantly conditioned, trained not free will, under the

guise of order and aid or safety, essentially eliminating the freedom of conscience by compelled government pressure, making humanity less safe and less free.

I am not going to denounce my beliefs in Jesus, and I do not regret seeking to preserve the Constitutional freedom to worship or not by the dictates of my own conscience not the dictates of the government through their religious partnerships and incited agents. Doing the right thing is more important than winning and losing.

Denied, I object. Should I be placed on inactive disabled status but for the exercise of my fundamental rights, including but not limited to the First Amendment right to petition, speech, exercise of religion and association, the public would be endangered by such precedent. The public would be at risk of loss of first amendment freedoms and protections by similarly 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, eliminating the administration of justice and the rule of law, in exchange for government control under the guise of order and unconstitutional tyranny under the guise of aid and protection towards the public or respondents.

Denied, and I object. The public would be at a loss of my speech, association, potential representation, affiliation and ideas.

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My unbending beliefs in Jesus and love for outsiders are unpopular with a large segment in the community, I am allowed to believe differently under the Constitution without government retaliation. My beliefs are not popular with Trump supporters and those condoning violence. I believe weak people use weapons, strong men use words and transform wrong doers into right doers, saving lives and eternal lives. It is scary down here in Sussex County. People are still talking about overthrowing the government and civil war. We need the courts to be our hero by the strength of the individual judges within the courts to guide the misguided with love, not fear and threats, but with correction and mercy. People down here really are confused between right and wrong. They do not need stern rebuke, but assurance their lives are valued and guidance to teach them to value and respect others unearned, required. We still need the Court to save our country, even if the judges within them think I am dumb and irritating. We need the Court to be a hero, even for those they do not like, even for me. It is scary down here. Someone talked about shooting me because of my religious speech, my stickers. Please help me. Do not retaliate against me just because you may think my beliefs are dumb.

The public would be at loss by such labeling me as disabled for merely thinking differently than the force fed commanded and controlled thought of

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government agents. The fact I think for myself makes me reasonable and of sound mind, instead of unreasonably adopting beliefs, without critical analysis.

I have proposed ideas to prevent the loss of social security, prevent pollution, without throwing money at the problems, improve healthcare, prevent oil drilling and other ideas to care for humanity, instead of exploiting them out of concern for profit, which benefits the public.

I have stood up against lawlessness which is a benefit to society, by filing an ODC action against Justice Kavanaugh, filing a Complaint against President Trump who incited an insurrection to overthrow a Presidential election, while trying to substitute President Biden for President Trump, and by drafting 5 proposed articles of impeachment to impeach President Trump. My efforts support and uphold the administration of justice from lawless reign by those who abuse and misuse government authority, exceeding the bounds of the Constitution and the rule of law.

I have a good reputation for honesty and integrity, even by individuals with different affiliations and religious beliefs. See Exhibit 31

I also proposed ideas to reverse a planned economic crash or to prevent one should one arise.

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In 2016, the World Economic Founder published a book, that outlines plans to eliminate the dollar, crash the US economy, causing a crash of the global economy to not only get out of the biggest bill falling due in the history of the world, the retirement and healthcare for the boomers globally, but to reduce to eliminate the protections afforded by the rule of law, replaced by control under the guise of order and aid of entities designed to exploit, not care for people. Exhibit 16, Citing *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=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl\\_hsN-RnQ](https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ)

Also see, Exhibit 17, *Covid-19: The Great Reset*, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, which may be found at

[https://carterheavyindustries.files.wordpress.com/2020/12/covid-19\\_-the-great-resetklaus-schwab.pdf, ...](https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-resetklaus-schwab.pdf, ...)

The past 4 presidents appear to be in the know of the plans contained therein, to eliminate the dollar, crash the economy, and remove the US's governing and guiding authority at home and abroad, essentially eliminating the rule of law

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replaced with lawless lusts, since they attended the World Economic Forum's yearly meetings.

Please key search 47 percent, Control F. See, how by 2026-7 47 percent of the US will be unemployed by design. See, how the scientific and health and electronic proposals in 2016 near the back of the book, are realities today, specifically Zuckerberg's recent proposals. I suspect the inventions were already made in 2016 or earlier, but society is being controlled by operant conditioning by slow implementation of the 2016 written plans.

See, how lawyer jobs will be eliminated by automation, potentially courts too (lawlessness). Humans are special. I believe they can reflect the image of God by unconditional love. There is a trend to dehumanize and demean the intrinsic worth of people. I believe each and every person is worth more than all the money in the world. Part of my pleadings is the loss of my ideas and concern for the public by ODC's desire to chill my speech and demean my character so others will not take me seriously.

I also have reached out to the government concerning religious concerns before, which may be an additional source for the ODC's retaliation against me now. As irritating as my petitions may be, I am still afforded an opportunity to ask. There are no guarantees of justice. It is only the opportunity without

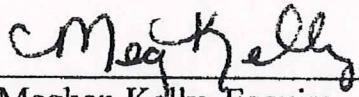
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retaliation or interference, we must protect, the access to the courts for even the least of these, for me.

WHEREFORE, I respectfully request the Board dismiss the petition, enter an order denying the ODC's petition, dismissing the petition, and waiving costs as applied to me.

Dated November 19<sup>th</sup>, 2021

Respectfully submitted,

  
\_\_\_\_\_  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Bar No. 4968

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

Dated: Nov. 19, 2021

Meghan Kelly (printed)

Meg Kelly (signed)

Meg Kelly  
Meghan Kelly, Esquire

SWORN TO AND SUBSCRIBED before me this 19<sup>th</sup> day of Nov.,  
2021.

Margaret L. Naylor, Esq.  
Notary Public Margaret L. Naylor, Esq.  
under 29 Del. C § 4323(a) Del. Bar ID 247

N/A

Expiration

Exhibit

G

there are 5 steps  
in this car

# Exhibit G

**THE SUPREME COURT OF THE STATE OF DELAWARE**  
**BOARD ON PROFESSIONAL RESPONSIBILITY**  
**OF THE SUPREME COURT OF THE STATE OF DELAWARE**

RESPONDENT'S MORE PARTICULARIZED MOTION TO SUSPEND HEARING TO ALLOW OPPORTUNITY FOR HER TO RESEARCH AND PREPARE A DEFENSE, AND REQUEST FOR OPPORTUNITY TO DRAFT REQUESTS FOR ADMISSION, INTERROGATORIES AND SUBPOENA OPPOSING COUNSEL AS WITNESS, AS A NECESSARY WITNESS TO 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 EXERCUSE 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 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 THE RESPONDENT

AND NOW this January 15, 2022, respondent, Meghan M. Kelly, pro se, contemporaneously with her Motion for an Immediate Emergency Determination, pursuant to the Substantive and Procedural Due Process Clause and the Equal Protections Clause applicable to the state pursuant to the 14<sup>th</sup> Amend., and the 1<sup>st</sup> Amend. applicable to the state pursuant to the 14<sup>th</sup> Amend., and Del. Lawyer's R. Disciplinary Proc. 2 (c) brings this motion, simultaneously with a motion for

immediate relief 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.

1. On December 18, 2021, I filed a letter motion to the Board, objecting to the improper notice of the original hearing date, apprising the Board of my objection to the Delaware Supreme Court's appointment of counsel, despite my notice of objection to the court, the need to perform discovery and an opportunity to prepare a defense after a determination on counsel is made, and noticed the Board I desired to file motions to dismiss prior to the hearing, and require opportunity to be heard on such motions.

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2. The Board and Patricia Swartz received the December 18, 2021 on December 22, 2021, per the Post office's tracking information. (Ex A).

4. On December 29, 2021, I also filed a letter with the Board, the Court and Patricia Swartz, concerning the need for opportunity, and time to prepare my defense against the state based on illegality of proceeding, as applied to me, and based on lack of subject matter jurisdiction. (D.I. unknown incorporated in its entirety by reference, (Ex. B Proof of postage)).

5. In my Answer to the Petition, I apprised the Board and Patricia Swartz of my defense of illegality of proceeding, and requested dismissal based on lack of subject matter and illegality of proceeding, as applied to me, a party of one, motivated by the State to bring the petition to punish me for the exercise of my fundamental rights, in violation of the Equal Protections Clause and the Procedural and Substantive Due Process Clause for disparate treatment against me based on my religious beliefs. (D.I. unknown, incorporating Respondent's Answer to petition in totality, with exhibits thereto).

6. I followed up on the receipt status of my December 18, 2021 motion numerous times with the Board.

7. Since there was no response, until January 10, 2021, albeit an informal response, less than 3 full days prior to the scheduled hearing, I was compelled to draft a motion simultaneously before the Delaware Supreme Court

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and the Board, to prevent waiver of my fundamental rights, and the ability to exercise my protected activity without interference and retaliation by the state, but for my exercise of First Amendment rights, filed January 11, 2022. (D.I. unknown, incorporating my January 11, 2022 motion, in toto, by reference,

8. On that same day, the Board provided an order on the January 11, 2022 motion, which rendered the December 18, 2022 motion moot, since I requested the same relief.

9. I was not afforded a fair and impartial opportunity to be heard on December 18, 2021 motion, nor on a second outstanding motion served December 31, 2021, via First Class mail, relating to *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 and exhibits thereto, dated December 31, 2021.* (D.I. unknown, December 31, 2021 Motion incorporated herein in totality)

10. On January 12, 2022, I made a motion to the Delaware Supreme Court appealing the Order of the Board. (D.I. unknown, incorporated in toto, especially exhibits by reference of the Jan. 11, 2022 motion to appeal in its entirety, and apologizing for typos, and requesting mercy in light of the immediate).

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11. Patricia Swartz, opposing counsel, appeared to develop a response to a new motion, I did not make, or an old motion rendered moot as asked and answered, appearing to possibly miss the filing deadline, exceeding 20 days in responding. (Ex. C)

12. Patricia Swartz made such response, to harass and distract me, knowing I do not have a fair and adequate amount of time to gather facts, subpoena witnesses and to prepare a defense, including research. Otherwise, I would not have petitioned the Court for opportunity to defend my life and case in conformity with the Procedural and Substantive Due Process requirements, without disparate treatment by the state, motivated by impermissible reasons, for my exercise of fundamental rights, my poverty, and my religious associated beliefs, in violation of the Equal Protections Clause applicable to the state.

13. On January 12, 2022, I also Emailed two corrections on my Motion to appeal. I am not afforded the luxury of time in this matter, in violation of the procedural due process clause's opportunity to be heard to file a formal amendment due to the emergency, immediate nature of my petition. (Ex. D)

14. The Federal government is helping me with a vulture problem, an outside issue taking time away from me to prepare a defense. (Ex. E, E-mail relating to the federal government is helping me at no charge).

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15. On January 13, 2022, I filed a motion for an immediate emergency decision on my January 12, 2022 motion to appeal of the Board's order, due to the fact the court only had 4, now 3 days, to respond to the motion. (Ex F)

16. I have not been delaying in my assertions of protected rights to defend my Constitutionally protected activity, including the right to cross examine pursuant to the 6<sup>th</sup> Amend., in a proceeding likened to a criminal proceeding.

17. It was not until December 30, 2021 that the Delaware Supreme Court permitted me to represent myself.

18. The testimony of Chief Justice Sights is required to determine how my first and second petition relating to attorney dues were examined by the Delaware Supreme Court in order that I may have a clearer picture as to whether the entire Supreme Court incited the petition and interference in an active case, why the Court did not respond to my second petition relating to attorney dues, and whether he or the court or an agent of the court submitted my petition to the board to incite the Supreme Court's arm's attacks against me, interfering with an active case in known violation of 42 USC 1985(2).

19. I will need to cross examine Chief Justice Sights in person to determine and show whether Disciplinary Rule 11 relating to immunity does not apply according to the elements outlined in by the Third Circuit *Saucier test*.

20. The Supreme Court's *two-step Saucier* analysis governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015)

21. I also require subpoenas for Judge Clark and Arline Simmons to show illegality of motive for the proceeding.

22. Chief Justice, the Supreme Court, Judge Clark, the ODC knew or should have known that seeking to use the cloak of government authority, under the color of regulatory law, to chill or condemn or interfere with my ability to bring *Kelly v Trump* without government retaliation or pressure, violates my First Amendment Right to petition the Court, and arguably my fundamental right to speak, exercise of religion, and associate relating to my communications in my pleadings in *Kelly v Trump*, and communications in general.

23. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right. My right to a fair and impartial proceeding before the Board is a constitutional right too.

24. The Board's failure to grant proper notice, allow for opportunity to build and make a defense violates my right. In addition, a forum partial towards the state against me, also violates my right for a fair proceeding in contravention to

the Substantive and Procedural due process provisions and the protections I am afforded under the Equal Protections Clause against disparate treatment, and punishment by bringing a petition against me but for disagreeing with my exercise of fundamental rights.

25. "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); See, *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) ("In the performance of assigned constitutional duties each branch of the Government must initially interpret the Constitution, and the interpretation of its powers").

26. 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 illegal, as brought, 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)).

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27. The ODC may have power, but it does not have the power to act above the law, above the Constitution. Even I, an accused respondent 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.

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

29. Courts are a government service of the people, created to govern and guide not control, not exploit people for the bottom line.

30. The government does not run on money. The government runs on individual free choice, the collective free choice of the many who agree to respect the Constitutional laws protections of all people regardless of race, religion, poverty, gender, age or place of association.

31. When individuals within government no longer respect the Constitutional laws that make us free, we are no longer a free people.

32. The Board and the Court must place a check to tame lawlessness with the impartial rule of law, taming its own selfish desires at times, laying down their members' desires in order to care to see, know and love the people they serve.

33. The courts are not a business. Justice is not for sale, rendering those who have money, connections, and influence to exchange, with the ability to buy or barter for decisions, tipping the scales of bought injustice, eliminating freedom, making rights for sale by those who can buy them, in violation of the Equal Protections Clause.

34. I ask for a fair opportunity to research, gather facts, potentially even subpoenaing Mark Vavala, as I want to get a clearer picture of the Delaware Supreme Court's involvement in inciting this unconstitutional petition against me.

35. Even if the Delaware Supreme Court may have had pure motives, concerns relating to poverty to incite DE-Lapp's interference and investigations, they knew or should have known that the Court's armed interference of an active case was a violation of the Constitution and Federal Law.

36. I also would like time to consider Subpoenaing members of De-Lapp before a hearing too.

37. I would like to consider ask the lady who complained to Patricia based on my religious beliefs, whether she made such complaint in retaliation of my

complaint to the courts relating to disparate treatment of being black balled at CLE's as if I am no longer a member of the profession.

38. I believe the CLE taught people to go the way to hell, and tried to make her understand how psychological teachings to live based on conditioned desires, instead of laying down desires to care to know, to love, mislead people she misguided to harm and hell.

39. I believe those without eternal life live based on what they or others want, their dreams, their desires, instead of laying down the vanities of men, to do what God desires, also known as God's will, which takes the use of our brains, our conscience mind and free, not conditioned choice to love God and one another.

40. I believe mental health workers, psychologists and behavioral theories teach the mark of the beast, the way to hell, as fact. I am allowed to believe differently than the state. And the state is permitted to disagree with my religious beliefs. The state is not permitted to force their beliefs upon me with economic pressure, or pressure to my life and liberty relating to mental health proceedings, to punish me for my individual freedom of exercising of fundamental rights.

41. The CLE's and professional courses leave little room for improvement through open dialogue of its members, debate, finding flaws in solution. Instead, they create a conditioned, controlled, forced conformity of standards which stifle debate by rejection of criticism, and punishment for it.

42. 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.

43. I believe business greed is the mark of the beast spoken of in the bible, the mark of lawlessness, without the just rule of law from restraining entities and individuals from killing, stealing and destroying humanity to worship money and material gain as God, in place of God.

44. Business greed has wrongfully been declared the law. Experts are rendered to be the law by the Courts, supporting bought experts to serve material gain in entities, not for profits, religious organizations, charities and for profits alike.

45. Business greed is lawlessness. Business is not lawlessness. When businesses kill, steal and destroy with no restraint in the form of just laws, or justice in the courts, that is lawlessness.

46. I pray the Court and the Board will tame business greed with the just rule of law to be my hero in this case, not allowing business greed of the professional association of lawyers to eliminate the rule of Constitutional laws that grant me, a member of their profession freedoms, and the hero of the world in cases unrelated to mine.

Date Filed: 02/21/2023

Page: 268

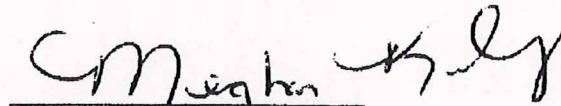
Document: 155-3

Case: 21-3198

Wherefore, I pray the Board grants my motion, and allows for time, to gather more information to research, perform discovery to prepare my defense, and allowance of subpoenas for witnesses.

Dated Jan. 15, 2022

Respectfully submitted,



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

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

Dated: January 15 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

Date Filed: 02/21/2023

Page: 270

Document: 155-3

Case: 21-3198

## Exhibit A



DAGSBORO  
28290 CLAYTON ST  
DAGSBORO, DE 19939-9998  
(800)275-8777

12/18/2021 09:05 AM

Product Qty Unit Price

First-Class Mail® 1 \$0.78

Letter

Wilmington, DE 19801

Weight: 0 lb 1.60 oz

Estimated Delivery Date

Tue 12/21/2021

Certified Mail®

Tracking #:

70210350000131665721

Affixed Postage

Affixed Amount: \$1.16

Total \$3.37

First-Class Mail® 1 \$0.78

Letter

Wilmington, DE 19801

Weight: 0 lb 1.60 oz

Estimated Delivery Date

Tue 12/21/2021

Certified Mail®

Tracking #:

70210350000131665714

Affixed Postage

Affixed Amount: \$1.16

Total \$3.37

Grand Total: \$6.74

Cash \$7.00  
Change -\$0.26

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USPS is experiencing unprecedented volume  
increases and limited employee  
availability due to the impacts of  
COVID-19. We appreciate your patience.  
\*\*\*\*\*

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Page: 272

Document: 155-3

Case: 21-3198

2021 0350 0001 3166 5721

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<b>OFFICIAL USE</b>	
Certified Mail Fee \$3.75	
Extra Services & Fees (check box, add \$0.00)	
<input type="checkbox"/>	Return Receipt (holograph)
<input type="checkbox"/>	Return Receipt (electronic)
<input type="checkbox"/>	Certified Mail Restricted Delivery
<input type="checkbox"/>	Adult Signature Required
<input type="checkbox"/>	Adult Signature Restricted Delivery
Postage \$0.78	
Total Postage and Fees \$4.53	
Sent to DISCOUNT MAIL & FAX 824-1 Street and Apt. No. or PO Box No. 420 City, State, Zip Code 19944 Delivery Date 12/18/2021	

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2021 0350 0001 3166 5721

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Certified Mail Fee \$3.75	
Extra Services & Fees (check box, add \$0.00)	
<input type="checkbox"/>	Return Receipt (holograph)
<input type="checkbox"/>	Return Receipt (electronic)
<input type="checkbox"/>	Certified Mail Restricted Delivery
<input type="checkbox"/>	Adult Signature Required
<input type="checkbox"/>	Adult Signature Restricted Delivery
Postage \$0.78	
Total Postage and Fees \$4.53	
Sent to DISCOUNT MAIL & FAX 824-1 Street and Apt. No. or PO Box No. 420 City, State, Zip Code 19944 Delivery Date 12/18/2021	

PS Form 3-65, April 2015  
One Reverse for Instructions



[FAQs >](#)

[Track Another Package +](#)

Date Filed: 02/21/2023

Page: 273

Document: 155-3

Case: 21-3198

**Tracking Number:** 70210350000131665721

[Remove X](#)

Your item has been delivered to an agent for final delivery in WILMINGTON, DE 19801 on December 21, 2021 at 2:54 pm.

 **Delivered to Agent for Final Delivery**

December 21, 2021 at 2:54 pm  
WILMINGTON, DE 19801

[Feedback](#)

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Go to our FAQs section to find answers to your tracking questions.

# USPS Tracking®

[FAQs >](#)

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Date Filed: 02/21/2023

Page: 274

Document: 155-3

Case: 21-3198

**Tracking Number:** 70210350000131665714

[Remove X](#)

Your item has been delivered to an agent for final delivery in WILMINGTON, DE 19801 on December 21, 2021 at 2:54 pm.

## Delivered to Agent for Final Delivery

December 21, 2021 at 2:54 pm  
WILMINGTON, DE 19801

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## Exhibit B



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DAGSBORO, DE 19939-9998  
(800)275-8777

12/29/2021 11:19 AM

Product	Qty	Unit Price	Price
---------	-----	------------	-------

First-Class Mail® 1 \$2.96

Large Envelope

Wilmington, DE 19801

Weight: 0 lb 10.00 oz

Estimated Delivery Date

Mon 01/03/2022

First-Class Mail® 1 \$3.16

Large Envelope

Wilmington, DE 19801

Weight: 0 lb 10.30 oz

Estimated Delivery Date

Mon 01/03/2022

First-Class Mail® 1 \$3.36

Large Envelope

Dover, DE 19901

Weight: 0 lb 11.30 oz

Estimated Delivery Date

Mon 01/03/2022

Grand Total: \$9.48

Cash \$20.00

Change -\$10.52

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Date Filed: 02/21/2023

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Document: 155-3

Case: 21-3198

## Exhibit C

Re: Moot/Order made/ No new Motion Re: CONFIDENTIAL ODC FILE No. 115327-B/Misc 541

From: Meg Kelly (meghankellyesq@yahoo.com)

To: angela.james@delaware.gov

Cc: patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov; supreme\_court\_bprfilings@delaware.gov; lisa.dolph@delaware.gov; meghankellyesq@yahoo.com

Date: Thursday, January 13, 2022, 02:35 PM EST

Good afternoon,

To clarify, with regards to the outstanding motion, I mean my motion to appeal with the Delaware Supreme Court. No new motions have been made with the Board since they rendered an Order.

Thank you,  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Thursday, January 13, 2022, 02:13:14 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good afternoon,

An order was already rendered, and a new motion has not been made.

I am not required to reply to a response, when an order has been rendered, no matter how much I am tempted to contest the assertions in the reply. My response would be moot.

The standards of a fair proceeding have not been thrown out the window, merely because the venue is with the Board of Professional Conduct of the Supreme Court of the State of Delaware, which uses the Superior Court Rules of Civil procedure.

I am copying the Delaware Supreme Court since Karlis P. Johnson indicated the documents are not e-filed in a docket, in light of my outstanding motion.

Have a good afternoon.

Very truly,  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Acting as the accused party, not as an advocate on behalf of another

On Thursday, January 13, 2022, 01:37:03 PM EST, James, Angela D (Courts) <angela.james@delaware.gov> wrote:

Case: 21-3198 Document: 155-3 Page: 278 Date Filed: 02/21/2023

Dear Ms. Kelly:

Please see the attached Response to Respondent's Motion for Continuance in reference to the above-captioned matter.

Thank you.

*Angela James*

Paralegal

Office of Disciplinary Counsel

The Renaissance Centre

405 North King Street, Suite 420

Wilmington, DE 19801

(302) 651-3931

(302) 651-3939 (fax)



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No 541/ Bd 11537B Meg Kelly's Motion for immediate expedited review of Jan 12th Motion

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme\_courtfilings@delaware.gov; lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com

Date: Thursday, January 13, 2022, 04:00 PM EST

Good evening,

On the bottom of the motion I filed yesterday, I asked for expedited relief. But we only have 4 days the Court convenes before it is too late to render an order.

So, attached, please find a motion for immediate relief relating to the motion I filed yesterday.

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

Good night,  
Meghan Kelly\*  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

 Cert of Serv.pdf  
1.3MB

 Cert of word count.pdf  
47.7kB

 Drafted Order Emergency.pdf  
108kB

 Motion for immediate Expedited Relief.pdf  
111.6kB

## Exhibit D

Re: (1)Motion to suspend hearing until opportunity to build a case Appeal / Bd 11537B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme\_court\_bprfilings@delaware.gov; supreme\_courtfilings@delaware.gov; patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov; meghankellyesq@yahoo.com

Date: Wednesday, January 12, 2022, 03:37 PM EST

I apologize. I have a correction. You will see in the exhibits the federal government is helping me with vultures. I have to block out a time for them to come, which may interfere with scheduling.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr. Dagsboro,  
DE 19939  
meghankellyesq@yahoo.com

On Wednesday, January 12, 2022, 02:28:33 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Afternoon,

Attached, please find my motion to appeal the Order the Board rendered, and additional emails will include additional exhibits.

I am copying the Board to keep them in the loop should things change. I apologize for typos. I am a poor typist. In 9th grade I switched out of typing so as not to affect my high school GPA. Bad choice. Learning is most important, not winning or being on top of others for temporary reward. Sorry.

Thank you,  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

Case: 21-3198 Document: 155-3 Page: 282 Date Filed: 02/21/2023

Fw: Vulture problem 541 bd case 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme\_court\_bprfilings@delaware.gov; supreme\_courtfilings@delaware.gov; karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com

Date: Wednesday, January 12, 2022, 04:25 PM EST

Good afternoon,

Per the message below, the federal government agreed to help stop the vultures from chasing me and attacking me. I saw it was merely the DNREC email I attached.

I apologize for the typo, and other typos. Time is not on my side. I cannot waive fundamental rights.

Thank you,  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
No 4968  
Not acting as an attorney advocate

----- Forwarded Message -----

**From:** Michaels, Trevor A - APHIS <trevor.a.michaels@usda.gov>  
**To:** meghankellyesq@yahoo.com <meghankellyesq@yahoo.com>  
**Sent:** Thursday, January 6, 2022, 12:00:07 PM EST  
**Subject:** Vulture problem

Good morning,

Your name and email was forwarded to us by DNREC in regards to vulture issues. We would be happy to assist with the issue if possible. It sounds like the use of a loaner laser or pyrotechnics (by one of our staff) may be the best course of action depending on the site layout. Would it be permissible to send someone out for a site visit to assist? If so, is there a day/time that would work best? Thank you,

Trevor Michaels  
District Supervisor APHIS MD/DE/DC Wildlife Services  
Chesapeake Bay Nutria Eradication Project  
2145 Key Wallace Dr.  
Cambridge, MD 21613  
Office: 443-225-7430  
Cell: 443-205-2726  
Trevor.a.michaels@usda.gov

Date Filed: 02/21/2023

Page: 283

Document: 155-3

Case: 21-3198

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## Exhibit E

RE: Vulture problem

From: Michaels, Trevor A - APHIS (trevor.a.michaels@usda.gov)

To: meghankellyesq@yahoo.com

Date: Monday, January 10, 2022, 08:12 AM EST

Ms. Kelly,

There would be no charge for a site visit or loaner laser, or if our employee were to use pyrotechniques on site. However, the laser would need to be returned when the problem is resolved (we could pick it up). Just let me know if you would like us to come out for a site visit. Thank you,

Trevor Michaels  
District Supervisor APHIS MD/DE/DC Wildlife Services  
Chesapeake Bay Nutria Eradication Project  
2145 Key Wallace Dr.  
Cambridge, MD 21613  
Office: 443-225-7430  
Cell: 443-205-2726  
[Trevor.a.michaels@usda.gov](mailto:trevor.a.michaels@usda.gov)

**From:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Sent:** Sunday, January 9, 2022 7:50 AM  
**To:** Michaels, Trevor A - APHIS <[trevor.a.michaels@usda.gov](mailto:trevor.a.michaels@usda.gov)>  
**Cc:** Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)>  
**Subject:** Re: Vulture problem

Hello,

I apologize for writing on the weekend. I am scared. The vultures peck at the skylights and windows. They do not go away when I yell at them. They just look at me.

Case: 21-3198 Document: 155-3 Page: 286 Date Filed: 02/21/2023

I am getting sued by the government for my faith in Jesus Christ. They think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money.

I have papers everywhere and am fighting for my life and liberty. The trial against me is scheduled Thursday, Jan 13, 2022, despite the fact I did not receive proper notice, and requested an opportunity to conduct discovery to show the action is illegal and to show the state does not have subject matter jurisdiction against me. I sued the Presidents to dissolve executive orders that pay churches to perform government business under the guise of charity, when 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. These entities will not be tempered with just laws, or the law of love written on the hearts of man. I read the plans the Fourth Industrial Revolution and the Great Reset and review the laws and see there is a workable plan through unjust policies to eliminate private property and make everything and everyone no longer free but for sale to be rented out. Schemes may be undone.

I do not feel well. I lose five pounds of water weight due to a surgery I had 20 plus years ago. So, I think the vultures see I am weak, and 100s of them may attack me. It is creepy the vultures do not go away when I scream at them on the inside of the house. It is like I am trapped. Since they swooped in on me a few times, I am scared to go to the car and mailbox when no other person is outside.

Thank you for caring to help the least of these. This is unusual. Their aggressive behavior is not normal.

Thank you,

Meg

On Thursday, January 6, 2022, 12:00:07 PM EST, Michaels, Trevor A - APHIS <[trevor.a.michaels@usda.gov](mailto:trevor.a.michaels@usda.gov)> wrote:

Good morning,

Your name and email was forwarded to us by DNREC in regards to vulture issues. We would be happy to assist with the issue if possible. It sounds like the use of a loaner laser or pyrotechnics (by one of our staff) may be the best course of action depending on the site layout. Would it be permissible to send someone out for a site visit to assist? If so, is there a day/time that would work best? Thank you,

Trevor Michaels

District Supervisor APHIS MD/DE/DC Wildlife Services

Chesapeake Bay Nutria Eradication Project

2145 Key Wallace Dr.

Cambridge, MD 21613

Office: 443-225-7430

Case: 21-3198 Document: 155-3 Page: 287

Case: 21-3198 Document: 02/21/2023

Cell: 443-205-2726

Trevor.a.michaels@usda.gov

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Case: 21-3198 Document: 155-3 Page: 288 Date Filed: 02/21/2023

mk

Exhibit E<sup>y</sup> F

No 541/ Bd 11537B Meg Kelly's Motion for immediate expedited review of Jan 12th Motion

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme\_courtfilings@delaware.gov; lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com

Date: Thursday, January 13, 2022, 04:00 PM EST

Good evening,

On the bottom of the motion I filed yesterday, I asked for expedited relief. But we only have 4 days the Court convenes before it is too late to render an order.

So, attached, please find a motion for immediate relief relating to the motion I filed yesterday.

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

Good night,  
Meghan Kelly\*  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com



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Case: 21-3198 Document: 155-3 Page: 290 Date Filed: 02/21/2023

**THE SUPREME COURT OF THE STATE OF DELAWARE**  
**BOARD ON PROFESSIONAL RESPONSIBILITY**  
**OF THE SUPREME COURT OF THE STATE OF DELAWARE**

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

**EMERGENCY MOTION FOR IMMEDIATE RELIEF  
REQUESTING REVIEW OF  
RESPONDENT'S MOTION APPEALING ORDER  
OF THE BOARD ON PROFESSIONAL RESPONSIBILITY  
OF THE SUPREME COURT OF THE STATE OF DELAWARE DATED  
JANUARY 11, 2022,**

GRANTING POSTPONEMENT OF HEARING FOR 8 DAYS  
DUE TO ILLNESS, NOT A REASON IDENTIFIED IN MY MOTION TO  
GRANT POSTPONEMENT TO AFFORD ME OPPORTUNITY TO  
PREPARE A DEFENSE, PERFORM DISCOVERY, RESEARCH, FILE  
MOTIONS, BE HEARD ON OUTSTANDING MOTION(S)  
UNADDRESSED BY THE BOARD, TO DEFEND MY EXERCISE OF  
FUNDAMENTAL RIGHTS AND TO PRESERVE MY LICENSE TO  
PRACTICE LAW, ON THE GROUNDS THE AMOUNT OF TIME IS NOT  
ENOUGH AND A HEARING DATE SHOULD BE POSTPONED UNTIL  
AFTER A FAIR OPPORTUNITY TO BUILD A DEFENSE IS GRANTED

AND NOW this January 13, 2022, respondent, Meghan M. Kelly, pro se, pursuant to the Substantive and Procedural Due Process Clause and the Equal Protections Clause applicable to the state pursuant to the 14<sup>th</sup> Amend., and the 1st Amend. applicable to the state pursuant to the 14<sup>th</sup> Amend., respectfully requests the Delaware Supreme Court grant immediate emergency relief by reviewing her motion to appeal, dated January 12, 2022, entitled, *Respondent Meghan M. Kelly's Appeal of the Order of the Board on Professional Responsibility of the Supreme*

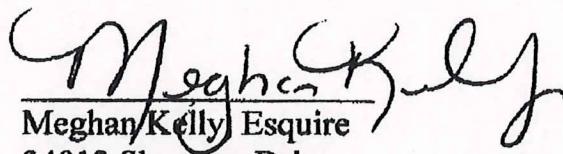
*Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) 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.*

1. Respondent apologizes to the Court regarding typos in her motion, and prays the court has mercy on her in light of the hardship of her circumstances.
2. There are only 4 full working days before the hearing, now scheduled for January 21, 2022, affording little time for the Court to respond to give sufficient notice of its decision to all parties involved.
3. The Court does not convene on Monday, a holiday.
4. I respectfully ask the Court to review my motion to appeal, dated January 12, 2021, immediately, on an expedited basis, in order to make a determination swiftly.

Wherefore I pray the Court expedites and grants immediate relief on my motion.

Dated Jan. 13, 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 Count 298)

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

Dated: January 13, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

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U.S. DISTRICT COURT DISTRICT OF DELAWARE

No.: 1:21-cv-01490-CFC

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

CERTIFICATE OF SERVICE OF 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

I, Meghan M. Kelly, Esquire, hereby certify that on January 10, 2022, I had a true and correct copy of the foregoing, *Plaintiff's second additional motion pursuant to FRCP R. 52 (b), 59(e) and 60(b)(1)(2)(6) to amend findings of fact 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*, dated January 18, 2022, sent to all Defendants through their attorney, per their counsel's request, including Defendants Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel, David A. White, Disciplinary Counsel Kathleen M. Vavala, Office, the Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Defendant Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware at

Zi-Xiang Shen  
Delaware Department of Justice  
Carvel State Building 820 N. French St. 6th FL  
Wilmington, DE 19801, served via first class mail:

Jan. 18, 2022

Respectfully submitted,  
Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968

34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Acting as unrepresented indigent party,  
unrepresented by counsel

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

Dated:

1/18/22

Meghan Kelly (printed)

Meghan Kelly (signed)

U.S. DISTRICT COURT, DISTRICT OF DELAWARE

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

No.: 1:21-cv-01490-CFC



PLAINTIFF'S CERTIFICATE OF COMPLIANCE

WITH WORD COUNT PAGE LIMIT

1. I, Meghan Kelly, this 18th day of January, have complied with the page and word requirements for this Motion for a pro se party, not acting as an attorney advocate on behalf of another.

2. Microsoft Word's Word Processor counted 3,117 words, with 10 pages.

Dated

1/18/22

Respectfully submitted,

Meghan Kelly

Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939

meghankellyesq@yahoo.com

Acting as unrepresented indigent party,  
unrepresented by counsel

I declare, affirm that the foregoing statement is true and correct under the  
penalty of perjury, dated 1/18/22

Meghan Kelly (printed)

Meghan Kelly (signed)