

THIRD CIRCUIT COURT OF APPEALS

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

**Appellant Meghan Kelly's Motion to dispense of the hearing, requesting no oral argument be conducted and that this appeal be determined on the papers**

Pursuant to Fed. R. App. P. 2, for good cause to prevent manifest injustice, Appellant Meghan Kelly moves this Honorable Court to dispense of the hearing, requesting no oral argument be conducted and that this appeal be determined on the papers, and I aver.

1. I seek to dispense of an appeal hearing as unnecessary, causing undue burden upon me. The appeal may be fairly determined upon the papers.

2. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888). This Court must grant this motion and dispense of a hearing to prevent abuse, oppression and injustice in this case as applied to me.

3. On October 25, 2021, I filed this law suit, in part, based on the State's malicious discriminatory persecution and attacks that abridged my

first amendment right to petition and its abridgement of my 1st Amendment right to assert religious beliefs contained in petitions.

4. The Defendants in collusion with the Delaware Supreme Court members and agents attacked me, a private party, during a live controversy in *Kelly v Trump* to cause me to forgo my private exercise of the First Amendment right to petition in that case. The State committed witness tampering in violation of 42 USC § 1985, by pressuring me not to petition and testify as a witness and a party in this ongoing case.

5. The Delaware Supreme Court improperly sealed documents during the proceeding in *Kelly v Trump*. Then, the Delaware Supreme Court participated in eliminated witnesses by terminating them from the Chancery Court's staff to prevent evidence in my favor from being seen or used in my defense in this case and the disciplinary proceedings.

6. I also brought the case for the state's abridgment of my right to petition and right to religious belief with regards to other petitions including an exemption of bar dues for all attorneys facing economic hardship, and for years of asserting petitions to safeguard my First Amendment private right to religious belief, including but not limited to running for office without compromising my faith in Jesus Christ's teachings. The petitions were

largely ignored or violated without a necessary reason more compelling than the exercise of fundamental rights. (US Amend I, XIV).

7. It is the right to petition and the opportunity to be heard I seek to protect, not the guarantee of justice, at least at this stage of the proceeding. If those with diverse religious beliefs are denied access to the Courts merely because the state finds their religious beliefs and exercise of religious beliefs repugnant or unusual, yet genuinely held, then injustice is guaranteed in violation of the 5th Amendment's Equal Protection component.

8. More than a week after I filed this civil rights law suit Kelly v Swartz, Number 21-1490, the Defendants initiated the disciplinary proceeding in retaliation for my private First Amendment right to petition, First Amendment private right to religious belief, First Amendment private right to speech contained in my petitions outlining my religious-political genuinely held private religious beliefs, my private Constitutional right to seek to run for office without compromising my religious beliefs, First Amendment private right to religious exercise, and First Amendment private right to association, as a Christian, Catholic, lawyer, and democrat. (emphasis intended).

9. The Defendants placed my Delaware license to practice law on inactive disabled status, but for the private exercise of my First Amendment rights. The Delaware judgment foreseeably caused other law suits against me for reciprocal discipline for my other licenses to practice law in other jurisdictions.

10. The State deems my license to practice law as an exchange for reduced or elimination of my private fundamental rights. The State admitted the reason it attacked me and later brought a disciplinary proceeding against me was based on my Religious-political petitions, my citations to the Bible and my private speech outlining my religious beliefs contained in my petitions. My religious beliefs were in issue in my Religious Freedom Restoration Act petition against former President Donald Trump where I sought to eliminate a government incited burden upon my religious exercise.

11. A professional's private exercise of First Amendment exercise of speech, association, religious belief, religious exercise, and the right to petition to defend the exercise of Constitutional freedom in their private capacity must not be eliminated in exchange with a mere license.

12. I must not be compelled to violate my religious belief by compelled religious violations of my belief in order to regain my license.

13. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because the Court finds my religious beliefs contained in my speech in my private petitions illogical.

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

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

292 F.2d 719, 722: ("One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.")

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

17. This Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at \*15 (June 27, 2022) held, "Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities."

18. In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state's punishment violated the Coach's first Amendment right applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

19. This case must be extended to me to prevent the state's punishment of me, but for the exercise of my exercise of my private right to petition to safeguard my private religious beliefs, as outlined in my speech in my petitions.

20. I assert my First Amendment right to petition in other courts to protect my licenses and my Constitutional liberties. I must be afforded the opportunity to argue licenses to work must not eliminate my private rights, as applied.

21. A hearing would needlessly divest me of time needed to petition in other cases causing me to forgo Constitutional rights in other forums.

22. There are lawsuits or potential appeals in PA, DE, District Court for the Eastern District of PA, Delaware District Court, Third Circuit Court of Appeals, as well as this case, for a total of 6 law suits relating the Delaware Disciplinary order.

23. I do not have the capacity to defend all cases simultaneously. I do not have the ability to print, research or even proof-read documents to defend my life, liberty, licenses and eternal life in all courts, simultaneously. I am prejudiced due to lack of time required to assert my rights in lawsuits, while safeguarding my life and health.

24. I am threatened with irreparable injury in terms of loss of the fundamental right to petition and loss of my private exercise of First Amendment rights as well as harm to life and health. I have already

developed the shingles during the Delaware disciplinary case. I have also collapsed at the post office due to lack of time I asserted I need to live, as well as time needed to defend my exercise of fundamental rights.

25. My health has foreseeably suffered as a result of Defendants' attacks and disciplinary proceedings. I remain dehydrated and require time to safeguard my life and my right to petition on appeal and in other cases. I require time to rest, exercise and drink gallons not cups of water to alleviate severe dehydration associated with bad healthcare I received as a teenager to sustain my life.

26. I have given this Court notice and all other courts notice of my health condition and requirements to sustain my life. See, Third Circuit Docket Item (herein "3DI") 3DI-154-4, 3DI-59-2, 3DI 167-17, Delaware District Court Docket Item ("DI") DI.4 at Exhibit 43). I have had to assert my right to live for more than 20 years since many people do not want to be inconvenienced with the needs of others to sustain their lives. One time during college at the University of Delaware, I collapsed, completely fainted and peed my pants due to severe dehydration. When I woke up, the college class was over. I was left there alone in the classroom. Everyone left and went on with their business. I lose about 5 pounds of water weight each month and must drink a large amount of water. I have not had time to

rehydrate for months and have been very dehydrated and unwell for months. I require time and assert my right to live. I believe people sin by compelling them to pay a professional or pay for a product with regards to healthcare. I have religious objections to healthcare and mental healthcare examinations and treatment. I believe that many people go to hell for adopting some of their beliefs, theories and care. I am not kidding. When I ran for office I sought to improve our harmful care. I really do believe much mental healthcare and healthcare misleads many to harm and damnation in the fires of hell.

27. Requiring a hearing would prejudice me, causing additional loss of time.

28. I have not had time to shower every day. On more than one occasion, I have slept in the clothes I wore the prior day or prior two days, due to lack of time for even basic comforts as I fight for my life, liberty, licenses in these 6 law suits arising from Defendants' misconduct.

29. I am so backed up because Defendants foreseeably caused 6 lawsuits. I require time to sustain my health and life. Yet, I must assert my rights to prevent a waiver even imperfectly, without time needed to proof read or research in all matters. I understand I have no rights if I do not assert

them. Rights may be waived if not invoked. So, with haste, fear and with tears in my eyes I ask this court to dispense of the need for a hearing to safeguard and not obstruct my First and Fifth Amendment right to petition other courts, including the petition of this case before the US Supreme Court.

30. I am not sure how I will have the time to research, draft, print out and pay for my other appeals, but I know I certainly cannot afford to pay for postage required to petition in other courts and the cost to pay to travel to this court too.

31. My appeal of Kelly v Third Circuit is especially important since it may be the only case the US Supreme Court may have to safeguard the judiciary by limiting the check upon federal judges to the purview of the constitution by 1. Law suits where there is a case or controversy or 2. by impeachment to prevent the courts from becoming partial towards the regulations that govern their seats instead of the impartial rule of law.

32. This limit I request the US Supreme Court to make is a religious exercise and argument since my religious beliefs as a Christian command me to seek to protect “justice in the courts.” *Amos 5:15, Matthew 23:23.* Without upholding and safeguarding the integrity and impartiality of

the courts by maintaining their independence, we are left with injustice and unequal, disparate partial applications of the law to serve those who regulate judges as opposed to serving all people. I oppose eliminating life time terms too for the same reasons. The US Supreme Court is convening on March 24, 2023 regarding that case. This is a week later than I expected.

33. If the federal courts are regulated by third parties with the backing of congress or by self-regulation then the federal judges will be tempted to become biased towards the regulations and those who sustain their seats, not the impartial Constitutional application of the rule of law.

34. This is a set up to overthrow people judges by creating injustice in fact under the deception of fairness.

35. I believe people judges and people staff are in trouble. Without people judges it will be easier for the next global schemed transition to take place.

36. In my complaint and amended complaint I sought to prevent the elimination of fiat currency for the crypto currency that was planned before the Patriot Act allowed its creation by opening the back doors to our devices.

37. There are worse schemes beyond the elimination of fiat currency the dollar as reserve currency.

38. I previously showed this Court and the Court below pages from the of the Great Narrative, the WEF's founders books indicating central banks would govern under the global not so green deal by credits and debts, without legal restraint. (Exhibit A)

39. There are planned worse times ahead. On December 5, 2022 the BIS already alerted that many government pensions funds will not be paid. (Exhibit B) We know unrest against the government is schemed by increased taxes and increase costs in basic necessities when government officials' own pay becomes in jeopardy. I seek to reverse *Kelly v Trump* to reverse the crash to reverse the schemed unrest to prevent the overthrow of our government schemed after 2050.

40. In the letter dated Feb. 28 below, I tried to explain to Chief Justice Colm F. Connolly that the federal reserve eliminated the reserve amount per its notice attached hereto from ten percent to zero, to create bank runs to intentionally crash the economy. (Exhibit C)

41. Banks used to lend out 90 percent of the deposits to earn interest or to invest in stocks. Now it is 100 percent, meaning their small bank reserves will have fewer dollars on hand. They cannot pay out

customers should bank runs occur causing bank crashes and harm to the precious people the government serves and cares for.

42. We saw two banks in wealthy areas crashed this month. The FDIC paid out the insured. The FDIC will not pay out the insureds of smaller banks and consumers when they run out of FDIC funds. They are preparing for bank buy ins, which are worth less than the deposits consumers will lose. The banks are designed to be in a controlled crash to increase need to have the people begging for the solution that will reduce their freedoms.

43. The elimination of the fiat currency to central bank crypto controlled currency is a mere transition in a fair more heinous scheme to increase hardship to cause foreclosures and loss of resources that will be transferred to the government to be given to those the government owes. Those who control the resources scheme to control the world through technology by eliminating governments by eliminating the rule of law's force.

44. It is not the government that is the problem. It is the elimination of the government by the government's private and foreign partners. The government's partners will take over the power of the

government to serve material gain without limits in the form of the rule of law to prevent oppressing, killing, or harming the people for their material gain.

45. I outlined the issue regarding taking back control of the currency in my complaint below because I desire to overturn *Kelly v Trump*. So someone may sue to prevent and reverse the crash and to safeguard our government from a slow overthrow. I have religious beliefs against debt. A Carbon debt system is schemed to eliminate our current economic model if the courts do not stop it. I desired to outline a way to protect our government, while making the people freer, instead of the proffered, preplanned solution that will eliminate the government while eliminating freedoms down the line. Whoever controls the coining power controls a puppet not free government. Congress must take back control.

46. I am a Christian. I believe Jesus when he says no one knows when the end of days are, but I knew back in 2020 that there were plans to use religion to incite war, and plans to demean religion as a business to reduce and eliminate religion to collaborative, conditional, compelled, controlled belief, under the lie for the common good. (Exhibit D). I believe what some propose leads to certain damnation in hell without repentance by allowing happiness, desires to be our God, to be controlled by those who

entice them, not free in Jesus Christ. Certain people including Yuval Noah Harari speak of eliminating the old religions including Christianity replaced by a new Religion that “will emerge from Silicon Valley, by worship of technology as guide and God.

Please see for example,

<https://www.bing.com/videos/search?q=new+religion+silicon+valley+harriri&qpvt=new+religion+silicon+valley+harriri&view=detail&mid=B7938D94BD97BAEA1F42B7938D94BD97BAEA1F42&&FORM=VRDGAR&ru=%2Fvideos%2Fsearch%3Fq%3Dnew%2Breligion%2Bsilicon%2Bvalley%2Bharriri%26qpvt%3Dnew%2Breligion%2Bvalley%2Bharriri%26FORM%3DVDRE> Also see,  
<https://www.bing.com/videos/search?q=new+religion+silicon+valley+harriri&qpvt=new+religion+silicon+valley+harriri&view=detail&mid=C53D0B1708AD09319CDCC53D0B1708AD09319CDC&&FORM=VRDGAR&ru=%2Fvideos%2Fsearch%3Fq%3Dnew%2Breligion%2Bsilicon%2Bvalley%2Bharriri%26qpvt%3Dnew%2Breligion%2Bvalley%2Bharriri%26FORM%3DVDRE>

47. Yuval Noah Harari teaches the new techno-religion will enable man to be his own God, the master of his own life, which is blasphemous. This teaches man to reflect the image of the devil to be damned in hell without repentance, by doing what you want instead of using your brain, to lay down your desires to do what is right in the eyes of God, love to overcome lusts and desires unrestrained by love or the just rule of law. See *Isaiah* 14. This is lawlessness on steroids. It is the mark of the beast spoken of in Revelation magnified. We need the just rule of law to tame this beast sin, not be devoured by it.

48. I am scared. I sent US Attorney General David Weiss an email because someone removed two screens from my window one day. This case gives me a voice, and protects me from harm so long as it remains alive.

49. My proposal is similar to Presidents Lincoln's and Kennedy's solutions. Those two presidents were murdered. I do not want to be killed or eliminated by demeaning me disabled to disparage my credibility.

50. I desire time to ask the Courts to be our hero. It is not money, nor military might that safeguards our freedom. It is human judges who sit on the bench who give us the opportunity, not a guarantee of justice.

51. Without people judges none are free. We are for sale products by whoever controls the resources including money. I think preventing the overthrow of our government by preventing the schemed elimination of the rule of law is an important interest to serve in granting this motion. See, the attached article, how powerful lobbyists desire to eliminate laws, including laws that grant us independence and freedom. (Exhibit E)

52. This Court cannot save the world if no one with standings asks them. I intend to ask this Court. Attending the hearing remotely still creates an unfair obstacle to my access to other courts at this time when I must now fight or waive my rights in multiple courts.

53. The time and money required to travel creates an obstacle to my access to the courts should any hearing be required. Throughout this proceeding, I have also experienced technical problems that prevent me a fair opportunity to be heard remotely. I am at a disadvantage since computers have broken and lost data since the inception of this case.

54. I attended the hearing by phone in the Disciplinary case. The reporter in the Delaware Disciplinary case said she could not hear me. She made up things and provided a transcript which did reflect my testimony accurately. While I provided some corrections, the amount of errors were too great to correct the entire transcript. So, I maintained my objections. I objected to the transcript as prejudicial. The reporter made up weird things I did not say which prejudiced me. I asserted my objections in state Court and maintained my objections. The Defendants disparaged me because I did not have the means to attend the proceeding remotely other than by phone due to poverty. It appears my phone reception is not reliable since the Reporter on the record indicated she could not hear me.

55. It appears I do not have the space on my cheap computer to easily attend a hearing remotely. I would be required to delete information on my computer. Deleting data prejudices me in my other cases, especially

since my memory sticks have lost data. I need immediate access to other cases too, in order to plead simultaneously on other cases.

56. At this time, I must fight cases or lose my right to believe in Jesus, other liberties and licenses. I am under the fire now and will burn if I am not afforded opportunity in the form of time. It is not by free choice I do not fight in all matters, it is government compelled choice to eliminate my means to do so, by creating unnecessary expenses and most importantly loss of time which prejudices me by creating a burden so great as to deny me fair access to the courts.

57. I am not afforded time to even proof read, prevent typos and run on sentences in my pleadings. I may have to give up Constitutionally valid arguments in other cases because I do not have the time despite telling this court. Denial of a stay and requiring additional time be expended at a hearing creates an obstacle to my access to other courts. The pleadings should suffice.

58. I cannot afford expenses associated with a hearing. Defendants' conduct and orders prevent me from seeking to return to work in the profession of my choice.

59. The potential costs of a reporter's transcript required for appeal, preparation, and traveling to this Court create a substantial burden and obstacle to my access to the Courts in contravention to my right to access to the Courts to assert protection of my exercise of fundamental rights and other relief applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, as applied to a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. US Amend I, V.

60. This Court may fairly review the pleadings to make a determination to prevent unnecessary costs from creating a burden so great as to deny me the First Amendment right to petition on appeal, in this court and in other forums.

61. On February 16, 2023, I filed *Appellant Meghan Kelly's Motion for this Court to waive costs for preparation and transmittal of the record to the US Supreme Court, should the Court require the record and other costs, fees, expenses, taxes or charges*, I incorporate herein by reference in its entirety. 3DI-146.

62. To my horror this Court denied my request on March 15, 2023. (3DI-168).

63. I request this Court dispense of the hearing and determine this appeal on the papers in order not to compel me: 1.) to violate my religious beliefs in exchange for access to the courts or 2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and 3). to prevent government compelled involuntary servitude to sin by making money savior in place of God. US Amend I, V, XIII.

64. I am utterly poor, and I have religious objections against debt. The costs associated with a hearing, especially reporter and transcript fees would cause me to violate my religious beliefs against debt. The costs violate my 1<sup>st</sup> and 13<sup>th</sup> Amendment right against involuntary servitude to Satan by making money savior to pay off what I did not willingly agree to.

*Matthew 6:24.*

65. I am a Christian. Jesus teaches you cannot serve God and money. I believe those who serve and seek money as savior through fundraising, charity or business serve Satan and will go to hell, should they not repent. *Matthew 6:24.* I believe we were all taught to go the way to hell by fundraising and selling girl scout cookies as children. Jesus teaches most people choose the way to hell. *Matthew 7:13-15, Isaiah 10:22.* I choose to seek the way to eternal life by not conforming to the lawless lusts of man

under the veil of the common good when it is the common normal wickedness. I choose to repent of my past sins.

66. I also invoke my right against involuntary servitude under the 13th Amendment against debt by unnecessary expenses when the Court may fairly review the pleadings to make a determination.

67. I believe people commit lawlessness leading to their damnation in hell when they focus on convenience, avoidance of costs and material gain at the cost of human sacrifice and sacrifice of fundamental rights, should they not repent.

68. I am a Christian. I believe you cannot serve God and Money. I believe you cannot serve God and the vanity of men.

69. I assert my right to fair access to the courts, without 1. requiring I forgo a Constitutional right to access to other courts, 2. my Constitutional right to religious belief and exercise of religious belief against debt, 3. without the substantial burden a hearing would cause under the facts of this case, and 4. without compelled violation of my 13<sup>th</sup> Amendment right against involuntary servitude the cost of a needless reporter's transcript and expenses associated with the hearing would cause.

70. I petition this Court to avoid costs in terms of time and money creating a substantial burden upon my access to the courts as to deny me Due Process, creating manifest injustice as applied to my unique situation. US Amend I, V.

Wherefore I pray the Court grants my motion.

Respectfully submitted,

Dated March 16, 2023

/s/Meghan Kelly

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Meghan Kelly, Esquire  
DE Bar Number 4968  
INACTIVE, not acting as  
an attorney on behalf of  
another  
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(4,457 words)

Under religious protest as declaring and swearing violates God's teachings  
in the Bible, I declare, affirm that the foregoing statement is true and correct

Dated: March 16, 2023

Meghan Kelly (printed)

Megh. Kelly (signed)

# Exhibit A

future. Their original ideas translate into narratives that produce models which in turn influence behaviour and help construct the future. Ultimately, they become instruments of policy and project market power. By way of demonstration, four innovative projects, or sets of projects, are described, all different from each other but all pertaining to the environmental sector (this macro category was chosen arbitrarily because it is where the stakes are the highest). Just a few years ago, all these ventures were unknown or in their infancy. Now, they are a collective testimony to the power of imagination of those who conceived them.

(1) Network for Greening the Financial System and beyond: Imagining new policies

The Network for Greening the Financial System (NGFS) is a group of 91 central banks and supervisors committed to mobilizing mainstream finance to support the transition towards a sustainable economy. It is investigating many bold financial innovations<sup>117</sup> that could (and most likely will) one day revolutionize the way in which climate-related risks are accounted for in central banking and banking supervision. In short, alongside governments (which have a much broader and more effective range of tools and policies available to prevent and mitigate climate-related risks), central banks will adapt their monetary policy operational frameworks to reflect climate-related risks. This will involve the mitigation of balance sheet risks that stem from climate change and environmental degradation, but also the active support of the transition to a non-carbon, green economy. Imagining what form this might take and devising policy tools and instruments to get there is the task of the NGFS, and largely depends on how climate risks will affect the economy and financial system through a range of different transmission channels.<sup>118</sup> The menu of options available is extensive and encompasses changes in all three most important policy fields of a central bank: credit operations, collateral policies and asset purchases. It is not the purpose of this book to delve into the technicalities of what this involves<sup>119</sup> but, suffice to say, some of the options represent a radical departure from standard central bank operational policies. They are, in short, the product of central bankers' imagination.

*Not limited by law*

Some ideas go into uncharted territory, well beyond the scope of what the NGFS is devising in terms of possible policies. Creating "carbon quantitative easing" policies is one of them. It's a novel, untested and somewhat outlier



narrative that already sounds familiar because it plays a key role in Kim Stanley Robinson's bestseller *The Ministry for the Future*. In the novel, as the climate crisis gets dramatically worse, the world's top central bankers end up cooperating by collectively abandoning caution to the wind and deciding to create a global "carbon coin" to fund decarbonization. Robinson's inspiration is grounded on some academic papers published less than five years ago,<sup>120</sup> and lately on the work of the NGFS, that doesn't (yet?) venture into such wild territory. But asserting novelists' "poetic licence", Robinson's imagination runs wild:

[The NGFS] suggested that possibly nations, companies and individuals who draw carbon from the atmosphere could be paid for it directly. Possibly petrostates could be compensated for the fossil fuels they keep in the ground. Possibly oil companies could be paid to suck carbon from the air and then pump it back into the ground; they could also be paid to pump water from under the great glaciers of Antarctica and Greenland, which are currently sliding into the sea on newly melted subterranean water slides. Of course, legislatures and citizens will need to urge their central banks, and ultimately to instruct or order them, to do these things. But the good news is that with these new strategies in hand, even in our current political economy, awkwardly suited at best to the task at hand, we might be able to pay ourselves to do the necessary things, and thus dodge the coming mass-extinction event.<sup>121</sup>

This idea is far-fetched, but it's already been picked by some hard-nosed investment bankers.<sup>122</sup> Besides, surely the very purpose of imagination is to venture into unknown territories!

(2) Nature-based solutions: An imaginative idea leading to a bloom of start-ups

It doesn't take much imagination to realize that nature gives freely. For centuries, not only have we taken this generosity for granted, but we've also exploited it to such an extent that we are now on the edge of a precipice. Of course, nature is not "free"; it is priceless, and a degree of imagination is needed to grasp what this means in terms of policy. For economists and policy-makers, valuing nature and assessing its contribution to our economies and societies is a

# Exhibit B

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## Dollar debt in FX swaps and forwards: huge, missing and growing<sup>1</sup>

*FX swaps, forwards and currency swaps create forward dollar payment obligations that do not appear on balance sheets and are missing in standard debt statistics. Non-banks outside the United States owe as much as \$25 trillion in such missing debt, up from \$17 trillion in 2016. Non-US banks owe upwards of \$35 trillion. Much of this debt is very short-term and the resulting rollover needs make for dollar funding squeezes. Policy responses to such squeezes include central bank swap lines that are set in a fog, with little information about the geographic distribution of the missing debt.*

*JEL F31, F34, F41.*

Embedded in the foreign exchange (FX) market is huge, unseen dollar borrowing. In an FX swap, for instance, a Dutch pension fund or Japanese insurer borrows dollars and lends euro or yen in the "spot leg", and later repays the dollars and receives euro or yen in the "forward leg". Thus, an FX swap, along with its close cousin, a currency swap, resembles a repurchase agreement, or repo, with a currency rather than a security as "collateral".<sup>2</sup> Unlike repo, the payment obligations from these instruments are recorded off-balance sheet, in a blind spot. The \$80 trillion-plus in outstanding obligations to pay US dollars in FX swaps/forwards and currency swaps, mostly very short-term, exceeds the stocks of dollar Treasury bills, repo and commercial paper combined. The churn of deals approached \$5 trillion per day in April 2022, two thirds of daily global FX turnover.

FX swap markets are vulnerable to funding squeezes. This was evident during the Great Financial Crisis (GFC) and again in March 2020 when the Covid-19 pandemic wrought havoc. For all the differences between 2008 and 2020, swaps emerged in

<sup>1</sup> We thank Stefan Avdjiev, Stijn Claessens, Mathias Drehmann, Hyun Song Shin, Nikola Tarashev and Goetz von Peter for useful comments. Branimir Grujić provided excellent research assistance. All errors are our own. The views expressed in this article are those of the authors and not necessarily those of the Bank for International Settlements.

<sup>2</sup> FX swaps and outright forwards cannot be distinguished in stocks data. Currency swaps are FX swaps with a maturity longer than one year in which coupons are also exchanged. Ideally, we would exclude from our analysis non-deliverable forwards (NDFs), which entail just a fractional payment, but they are not identified individually in the stocks data. This is unlikely to weaken our conclusions, as turnover data show that NDFs account for less than 10% of the average daily turnover of FX swaps, forwards and currency swaps.

### Key takeaways

- FX swaps, forwards and currency swaps give rise to dollar obligations that were backstopped in 2008 and 2020 by central banks acting on little information about who owed the debt.
- For non-banks outside the United States, dollar obligations from FX swaps, forwards and currency swaps have grown fast, reaching \$26 trillion or double their on-balance sheet dollar debt.
- In mid-2022, non-US banks with direct access to Federal Reserve credit only in their US operations owed an estimated \$39 trillion in dollars from FX swaps, forwards and currency swaps.

both episodes as flash points, with dollar borrowers forced to pay high rates if they could borrow at all. To restore market functioning, central bank swap lines funnelled dollars to non-US banks offshore, which on-lent to those scrambling for dollars.

This off-balance sheet dollar debt poses particular policy challenges because standard debt statistics miss it. The lack of direct information makes it harder for policymakers to anticipate the scale and geography of dollar rollover needs. Thus, in times of crisis, policies to restore the smooth flow of short-term dollars in the financial system (eg central bank swap lines) are set in a fog.

The missing dollar debt from FX swaps/forwards and currency swaps is huge, adding to the vulnerabilities created by on-balance sheet dollar debts of non-US borrowers. It has reached \$26 trillion for non-banks outside the United States, double their on-balance sheet debt. Moreover, it has grown smartly since 2016, despite the often significant premium demanded on dollar swap funding (Borio et al (2016)). For banks headquartered outside the United States, dollar debt from these instruments is estimated at \$39 trillion, more than double their on-balance sheet dollar debt and more than 10 times their capital.

This feature revisits Borio et al (2017), drawing on the comprehensive data in the 2022 BIS Triennial Survey. First, it updates the stylised facts concerning FX swaps/forwards and currency swaps. Second, it measures the missing dollar debt for non-banks resident outside the United States, and for banks headquartered outside the United States. Third, it highlights policy challenges.

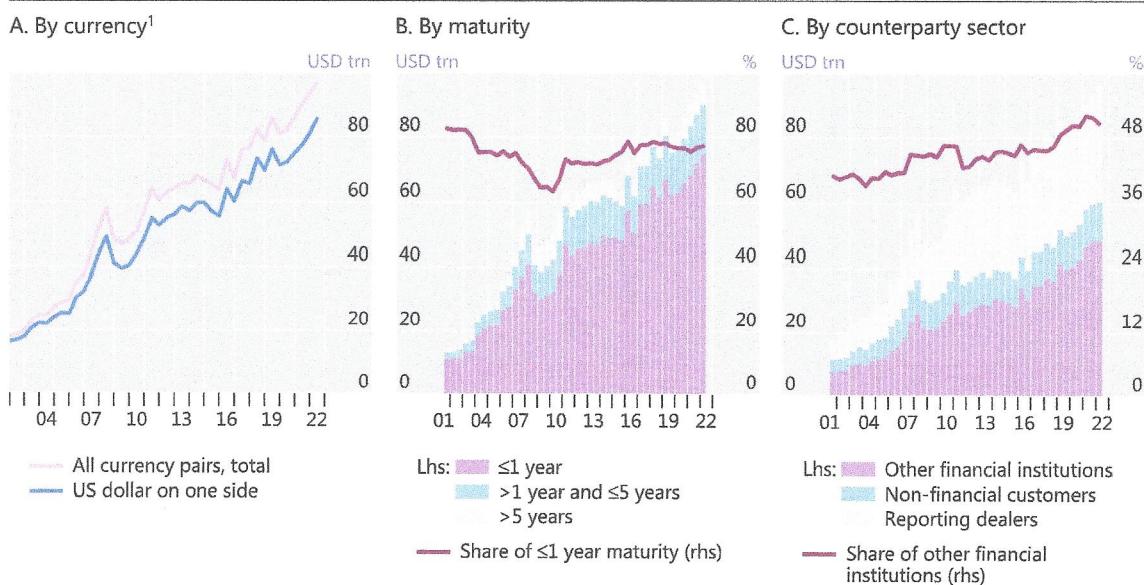
### FX swaps/forwards and currency swaps: some stylised facts

Payment obligations arising from FX swaps/forwards and currency swaps are staggering. Considering *all* currencies, outstanding amounts at end-June 2022 reached \$97 trillion, up from \$67 trillion in 2016 (Graph 1.A). This matched global GDP in 2021 (\$96 trillion) and was three times global trade (\$29 trillion). And it exceeded both global external portfolio investment (\$81 trillion) and international bank claims (\$40 trillion) at end-2021.

*Dollar* dominance is striking in this FX market segment, greater than in any other aspect of dollar use. As a vehicle currency, the US dollar is on one side of 88% of outstanding positions – or \$85 trillion (Graph 1.A). An investor or bank wanting to do an FX swap from, say, Swiss francs into Polish zloty would swap francs for dollars and then dollars for zloty.

## FX swaps, FX forwards and currency swaps outstanding

Graph 1



<sup>1</sup> The gold line is the aggregate of FX swaps, FX forwards and currency swaps. The green line is contracts in which US dollars are exchanged.  
Source: BIS OTC derivatives statistics.

The very short maturity of the typical FX swap/forward creates potential for liquidity squeezes. Almost four fifths of outstanding amounts at end-June 2022 in Graph 1.B matured in less than one year. Data from the April 2022 Triennial Survey show not only that instruments maturing within a week accounted for some 70% of FX swaps turnover, but also that those maturing overnight accounted for more than 30%. When dollar lenders step back from the FX swap market, the squeeze follows immediately (Correa et al (2020))

Financial customers dominate non-financial firms in the use of FX swaps/forwards. Non-bank financial institutions (NBFI), proxied by "other financial institutions"<sup>3</sup> in Graph 1.C, are the biggest users of FX swaps, deploying them to fund and hedge portfolios as well as take positions. Despite their long-term foreign currency assets, the likes of Dutch pension funds or Japanese life insurers roll over swaps every month or quarter, running a maturity mismatch. For their part, dealers' non-financial customers such as exporters and importers use FX forwards to hedge trade-related payments and receipts, half of which are dollar-invoiced (Boz et al (2020)). And corporations of all types use longer-term currency swaps to hedge their own foreign currency bond liabilities (McBrady et al (2010), Munro and Wooldridge (2010)).

## Missing dollar debt: mostly outside the United States

Just how large is the missing *dollar* debt from FX swaps/forwards and currency swaps? At end-June 2022, dealer banks had \$52 trillion in outstanding dollar positions with

<sup>3</sup> The counterparty group "other financial institutions" comprises mainly non-bank financial institutions such as pension funds, insurance companies and hedge funds, but also includes non-reporting banks.

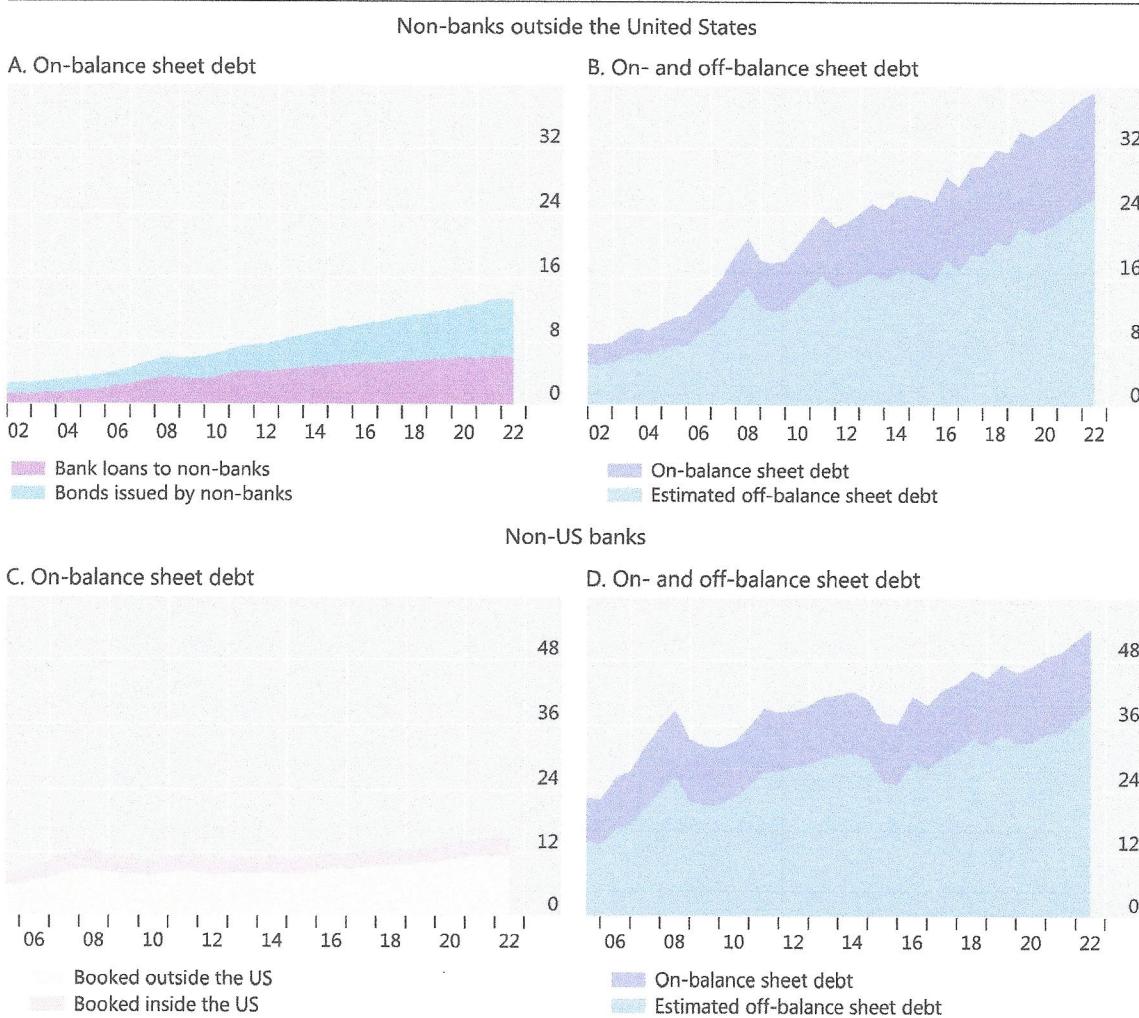
customers. Non-banks had dollar obligations of half of this amount, \$26 trillion.<sup>4</sup> This sum has been growing strongly, from \$17 trillion in 2016 (Graph 2.B).

This \$26 trillion dollar debt is likely owed by entities *outside* the United States, for which the dollar is a foreign currency.<sup>5</sup> They borrow dollars largely to hedge their dollar receivables and investments in a world in which the dollar is the dominant international currency. By contrast, NBFIs in the United States hedge their modest foreign currency assets by *lending* – not borrowing – dollars via FX swaps.

### US dollar-denominated debt<sup>1</sup>

In trillions of US dollars

Graph 2



<sup>1</sup> See technical annex for details.

Sources: US Office of the Comptroller of the Currency (OCC); Dealogic; Euroclear; Thomson Reuters; Xtrakter; national data; BIS consolidated banking statistics (CBS); BIS locational banking statistics (LBS); BIS OTC derivatives statistics (OTCD).

<sup>4</sup> We follow Borio et al (2017, 2020). Aldasoro et al (2020) shows that, at the global level, the banking sector is nearly balanced in FX swaps with a dollar leg. Since dealer banks and customers make up the entire market, a balanced banking sector implies that non-bank customers are balanced in dollars.

<sup>5</sup> BIS derivatives statistics do not have a counterparty country breakdown, and thus do not reveal the location of the non-bank users of FX swaps/forwards. See McGuire (2022).

And businesses in the United States have scant foreign currency payables to hedge by borrowing dollars off-balance sheet.<sup>6</sup>

The off-balance sheet US dollar debt of non-banks outside the United States substantially exceeds their on-balance sheet debt and has been growing faster. At end-June 2022, the missing debt amounted to as much as double the *on-balance sheet* component (Graph 2.B), which was estimated at "only" \$13 trillion (Graph 2.A). Moreover, the missing debt was "only" 1.6 times larger in 2016.

For their part, banks headquartered outside the United States, including some dealers in FX swaps, have even larger missing dollar obligations.<sup>7</sup> These banks deserve focus because of their limited access to the Federal Reserve's discount window for dollars. Their estimated off-balance sheet dollar obligations of \$39 trillion at end-June 2022 were much higher than the \$15 trillion in on-balance sheet dollar debt (Graph 2.C) and almost half as big as their combined total liabilities.<sup>8</sup>

### Policy challenges

The market turmoil during the GFC and in March 2020 highlighted the central role of the US dollar in the financial system. In each episode, disruptions in dollar funding markets led to an extraordinary policy response in the form of central bank swap lines, whereby the Federal Reserve channelled US dollars to key central banks.

These episodes point to a need for statistics that track the geography of outstanding short-term dollar payment obligations. Currently, in order to assess the level and maturity structure of foreign currency gross and net debt, analysts tend to rely on benchmark international statistical collections,<sup>9</sup> which generally cover only the on-balance sheet positions (McGuire (2022)). It is not even clear how many analysts are aware of the existence of the large off-balance sheet obligations. This makes it difficult to anticipate the scale and geography of dollar rollover needs.

Off-balance sheet dollar debt may remain out of sight and out of mind, but only until the next time dollar funding liquidity is squeezed. Then, the hidden leverage<sup>10</sup> and maturity mismatch in pension funds' and insurance companies' portfolios – generally supposed to be long-only – could pose a policy challenge. And policies to restore the flow of dollars would still be set in a fog.

<sup>6</sup> Non-banks in the United States had \$866 billion in foreign currency debt in 2021 (US Treasury et al (2022)). About 5% of the \$3.4 trillion in US imports were foreign currency-invoiced (Boz (2020)). Compared with \$26 trillion in dollar debt, any borrowing of dollars in swaps/forwards to hedge these payables may be considered as a rounding error.

<sup>7</sup> Positions are corrected for inter-dealer double-counting. However, the figure does not factor in any bilateral netting of payment obligations allowable under supervisory and/or accounting methodologies, which could more than halve *net* interdealer payment obligations.

<sup>8</sup> Total liabilities were \$92 trillion as reported by internationally active banks from 26 (of 31) jurisdictions that report the BIS consolidated banking statistics.

<sup>9</sup> These include the *International Investment Positions* (IIP) statistics, the *IMF Coordinated Portfolio Investment Survey* (CPIS), the *BIS locational banking statistics* (LBS) and the *BIS OTC derivatives* (OTCD) statistics, each of which has at least a partial currency breakdown.

<sup>10</sup> Dafermos et al (2022) argue that repos allow more leverage than swaps. Even so, the larger stock of swaps/forwards entails more dollar obligations than dollar repos.

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## Technical annex

Graph 2.A: Figures from the BIS Global Liquidity Indicators (GLI). Non-banks comprise non-bank financials, non-financial corporations, governments, households and international organisations.

Graph 2.B: Off-balance sheet liabilities estimated as one half of outstanding dollar FX swaps with non-banks; assumes that non-banks inside the United States are not dollar borrowers via these instruments.

Graph 2.C: The estimate of US dollar-denominated debt of banks headquartered outside the United States excludes intragroup positions but includes liabilities to other (unaffiliated) banks. From end-2015, it includes liabilities of banks in China and Russia; local positions of banks in China are estimated as 80% of local foreign currency deposits (national data).

Graph 2.D: Off-balance sheet debt estimated as (a) one half of global outstanding FX swaps with all counterparties (BIS OTCD statistics) less (b) one half of US banks' outstanding FX swaps (OCC data) plus (c) US banks' estimated net provision of US dollars via FX swaps (derived from the LBS and CBS; see Aldasoro et al (2020)).

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FINANCE

# BIS warns of \$80 trillion of hidden FX swap debt



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# Exhibit C

## Press Release

November 29, 2022

### Federal Reserve Board announces annual indexing of reserve requirement exemption amount and low reserve tranche for 2023

For release at 3:00 p.m. EST

Share

Not ten percent  
Zero

The Federal Reserve Board on Tuesday announced technical details related to reserve requirements for depository institutions. The annual indexation and publication of these amounts are required by law and does not indicate a change in depository institutions' reserve requirements, which will remain zero.

If reserve requirement ratios were not zero, these amounts would be used to determine the different ranges of reserve requirement ratios that could apply, depending on the amount of transaction account balances at a depository institution. The reserve requirement exemption amount will be set at \$36.1 million, up from \$32.4 million in 2022, and the low reserve tranche will be set at \$691.7 million, up from \$640.6 million in 2022. The adjustments to both of these amounts are derived using formulas specified in the Federal Reserve Act.

The adjustments will apply beginning January 1, 2023.

For media inquiries, please email [media@frb.gov](mailto:media@frb.gov) or call 202-452-2955.

*Federal Register notice: Reserve Requirements of Depository Institutions*

Last Update: December 09, 2022

## Policy Tools

### Reserve Requirements

As announced on March 15, 2020, the Board reduced reserve requirement ratios to zero percent effective March 26, 2020. This action eliminated reserve requirements for all depository institutions.

- FAQs

The following content explains the Board's authority to impose reserve requirements and how reserve requirements were administered prior to the change in reserve requirement ratios to zero. Additional detail on this reserve requirement regime can be found in the archived Reserve Maintenance Manual: [HTML](#) | [PDF](#).

The Federal Reserve Act authorizes the Board to establish reserve requirements within specified ranges for purposes of implementing monetary policy on certain types of deposits and other liabilities of depository institutions.

The dollar amount of a depository institution's reserve requirement is determined by applying the reserve requirement ratios specified in the Board's Regulation D (Reserve Requirements of Depository Institutions, 12 CFR Part 204) to an institution's reservable liabilities (see table of [reserve requirements](#)). The Federal Reserve Act authorizes the Board to impose reserve requirements on transaction accounts, nonpersonal time deposits, and Eurocurrency liabilities.

Prior to the change effective March 26, 2020, reserve requirement ratios on net transactions accounts differed based on the amount of net transactions accounts at the depository institution. A certain amount of net transaction accounts, known as the "reserve requirement exemption amount," was subject to a reserve requirement ratio of zero percent. Net transaction account balances above the reserve requirement exemption amount and up to a specified amount, known as the "low reserve tranche," were subject to a reserve requirement ratio of 3 percent. Net transaction account balances above the low reserve tranche were subject to a reserve requirement ratio of 10 percent. The reserve requirement exemption amount and the low reserve tranche are indexed each year pursuant to formulas specified in the Federal Reserve Act (see table of [low reserve tranche amounts and exemption amounts since 1982](#)).

For more history on the changes in reserve requirement ratios and the indexation of the exemption and low reserve tranche, see the [annual review](#) table. Additional details on reserve requirements can be found in this [Federal Reserve Bulletin article \(119 KB PDF\)](#), the appendix of which has tables of historical reserve ratios.

Announced March 15, 2020  
reserve requirements for small  
banks changed from  
10% to zero

They are set up to crash. Courts please catch them



# Exhibit D

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive  
Dagsboro, DE 19939

December 4, 2020

Register in Chancery  
Court of Chancery Courthouse  
34 The Circle  
Georgetown, DE 19947

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

**Word Count/Religious dissention here turning into global  
dissention and world war/words are more powerful than  
weapons/your words are more powerful than a nuclear bomb**

Dear Honorable Vice Chancellor Paul A. Fioravanti:

Thank you for allowing 15,000 words. I was past 1900. So, I  
eliminated my Free Exercise argument since the Freedom Restoration Act  
affords the same protection, albeit requiring greater protection for me. You  
scored a win Attorney General Barr, Esquire.

I also eliminated a lot of other arguments and bible verses, which was  
painful.

In my procedural history I tried to explain why I believe charity is the  
source of corruption in our government, under the guise of godliness. I also  
believe many things people praise as good as evil, like the mental health

industry, including mental health work by Catholic Charities, despite the fact I am Catholic.

I believe teaching business is charity or business is love causes harm in this life and damns people to hell in the next by replacing God in the hearts of men, love, with the love of money or material gain by barter or exchange, business greed.

If the court understands my diverse view, I think you can help save the world one day, hopefully in my day. Though the elaboration may appear superfluous. It is necessary for me to share since the Bible teaches Courts have the power to save eternal lives too.

I believe this Court may choose to be an eternal life saver, hopefully in my life time, but if not, in future generations.

I believe this Court is more powerful than the US Supreme Court. I believe true justice with correction and mercy prevents condemnation in hell and harm here.

I suspect if the Court does nothing, the seeds of government-party-religion will take root, creating dissention between government-religions in the United States, that may ultimately transition into conditions leading to a global religious war.

Though, I may not have standing to prevent this particular harm, world war in the name of my beloved God, I care. I believe this court can prevent foreseeable future bloodshed by removing the temptation to exacerbate the unholy union of government-religion or government-party-religion by ruling in my favor in this case.

I believe your words are more powerful than weapons. Your words are more powerful than a nuclear bomb. Your words have the power to create peace, and prevent needless bloodshed. You are powerful. Please use your power for good not greed and gain.

Thank you for your kind consideration.

Respectfully,

  
\_\_\_\_\_  
Meghan Kelly, Esquire  
Pro Se  
34012 Shawnee Drive  
Dagsboro, DE 19939  
(Word Count 506)  
Bar Number 4968

CC. Attorney General William Barr, Esq.

# Exhibit E



About

Resource Based Economy

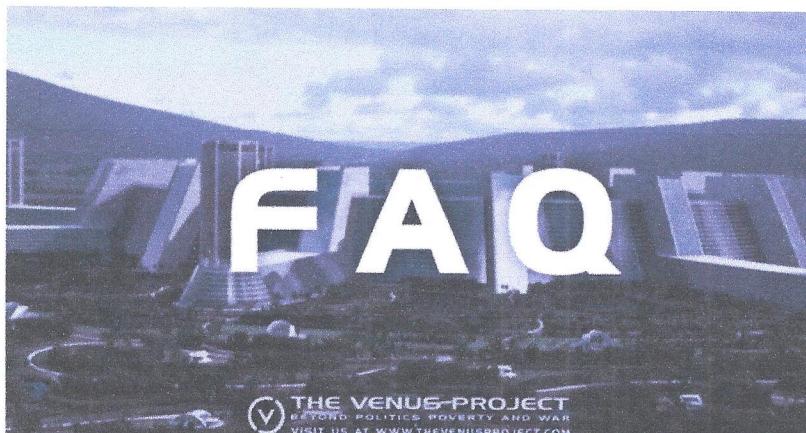
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## How can the use of Laws be eliminated?

Today we try to control human behavior by enacting

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In a resource-based economy, social responsibility would not be a function of artificial laws or force. Safeguards against abuse could be designed into the environment. An example of this is the proposed design of cities where people have free access to resources without debt. This would eliminate theft. Such measures are not a matter of passing and enforcing laws to prevent and punish abuse. Rather, they are a means of designing the flaws out of any social venture, thus eliminating the need for many laws.

We are proposing doing away with the systems that cause corruption and human suffering in the first place. In a city with safe, clean, mass transportation, we do not need police to monitor drivers' speed, behavior at stop signs, or proper papers.

Other examples are the air and the water. Although both are necessary to our well-being and survival, there are no laws regulating how many breaths are taken per hour because we have such abundance at this time. No one monitors a gushing spring to see how much water is taken from it, although fresh water is absolutely necessary for the support of life. If it is abundant, no one monitors it.

I must emphasize that this approach to global governance has nothing in common with the present aims of an elite few to form a world government with themselves at the helm, and with the vast majority subservient to them. This newer vision of globalization empowers every person on the planet to be all they

Project Center in Florida

Those who control the technology control the people as a resource and the resources they need.

More harm is schemed to gain the resources.

The country, not money, not might are our hope of a hero.

people, regardless of race, color, or creed. When governments make laws, we are led to believe that these laws are made to enhance people's lives. In truth, laws are byproducts of insufficiency.

The question is, "can we grow beyond thinking that "someone" has to make decisions for us?"

A better understanding of natural law involves human's relationship to the environment, which supports all life. All of nature is subservient to natural law. Natural law cannot be violated without serious consequences to individuals or societies. Natural laws dominate all living systems. For example, without water, sun, or nutrients, plants and animals die.

An environment of scarcity, hunger, and poverty is a threat to everyone.

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U.S. COURT OF APPEALS, THIRD CIRCUIT

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

**Certificate of Service of Appellant Meghan Kelly's Motion to dispense of the hearing, requesting no oral argument be conducted and that this appeal be determined on the papers**

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on March 16, 2023, I had a true and correct copy of the above referenced document sent to all Defendants through their attorneys, served via E-filing, and to

Zi-Xiang Shen and Caneel Radinson-Blasucci  
Delaware Department of Justice  
Carvel State Building 820 N. French St. 6<sup>th</sup> Floor  
Wilmington, DE 19801,

Dated March 16, 2023

Respectfully submitted,  
/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
(302) 493-6693  
meghankellyesq@yahoo.com  
US Supreme Court Bar No. 283696  
Not acting as an attorney on behalf of  
another

Under Religious objection I declare, affirm that the foregoing statement is true and correct.

Dated: March 16, 2023

Meghan Kelly  
(printed)

Meghan Kelly  
(signed)