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Related Application No. 22A981

IN THE SUPREME COURT OF THE UNITED STATES

In the Matter of Meghan Kelly in the Supreme Court of Pennsylvania, et. al.
Meghan M. Kelly, Petitioner

V

Office of Disciplinary counsel, aka Pennsylvania Disciplinary Counsel
On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania, Western District of PA,
Case Number 2913 DD3

**Petitioner Meghan Kelly's Motion to for leave to proceed in Forma Pauperis and exempt
costs and waive Court fees under Supreme Court Rules 38, 39 and 43**

Dated May 28, 2023

Respectfully submitted,

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**Petitioner Meghan Kelly's Motion to for leave to proceed in Forma Pauperis and exempt
costs and waive Court fees under Supreme Court Rules 38, 39 and 43**

I, Petitioner Meghan M. Kelly, having been granted in forma pauperis relief in other Matters, move this honorable to file in forma pauperis and to waive costs, potential costs and Court fees under Supreme Court Rules 38, 39 and 43, or that may be authorized but not required under 28 U.S.C. § 111 through 28 U.S.C. § 1932, 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in defense of the exercise of fundamental rights and license(s), and 3. to prevent government compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus. (Citing, US Amendments I, V, XIII). I aver as follows.

1. US Supreme Court Rule 43 outlines costs, "unless the Court otherwise orders." This Court has discretion to exempt costs. I ask this Court to exercise its discretion to exempt costs and fees as applied to me in this case.

2. I also argue this Honorable Court must exempt costs and fees in my case in order not to compel me to forgo my First Amendment fundamental rights of religious belief and

religious exercise of beliefs by compelled violation of exercise of my religious beliefs in exchange with the exercise of the right to petition the courts, based on disdain for my belief in God as God not money as savior and guide. US Amend I, V

3. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888); *Covell v. Heyman*, 111 U.S. 176 (1884); *Buck v. Colbath*, 70 U.S. 334 (1865); *Krippendorf v. Hyde*, 110 U.S. 276, 283 (1884).

4. This Court must grant my request for an exemption of costs and fees to prevent government abuse against my person, oppression, and injustice.

5. I was previously granted in forma pauperis status under Delaware District Court Case No 21-1490, Third Circuit Court of Appeals Case No. 21-3198, Third Circuit Case 22-3372, District Court, Eastern District of PA Case 22-45, Delaware Supreme Court matter No. 21-119, Delaware Chancery Court matters No. 2020-0809 and No. 2020-0157.

6 Even a few dollars in fees would cause a substantial burden upon my access to the courts to address Constitutionally protected activity relating to fundamental rights, creating an obstacle so great as to prevent my access to the courts.

7. I am a Christian, a child of God. I attend a Catholic church, but place my faith in God, not man, or money. I do not want to sin against God by incurring debt. I believe people sin against God by incurring debt. God teaches in *Romans* 13:8, "Owe no one anything, except to love each other, for the one who loves another has fulfilled the law." Since it compromises our loyalty to God towards the pursuit of money to free us from bondage of sin, as savior instead of God. Jesus teaches you cannot serve both God and money as savior. *Matthew* 6:24. I choose God. Earning money is not sin. When our desire to earn money takes the place of our desire to

do God's will, by hardening our heads, hardening our hearts and hardening our hands preventing us loving God foremost and subordinately loving others as ourselves, I believe we sin.

8. I believe "the love of money is the root of all evil. 1 *Timothy* 6:10.

9. I believe people go to hell for blindly doing their job, doing what they are trained to do to gain money to care for their family, not seeing clearly when they ignorantly harm others, even through delegation of duties. I believe not knowing is guilt. *Hosea* 4:6 I believe that Court correction can help them know and save their souls from being thrown unworthy into the fires of hell on the last day. I do believe courts have the power to save lives and eternal lives. I believe every time the court prevents individuals, entities, charities and even religious organizations from oppressing, killing, stealing and destroying human life, health or liberty, judges save souls. *Amos* 5:15, *Matthew* 23:23.

10. I believe creditors will be damned to hell for not forgiving monetary debts. (*See, Matthew* 6:12, "And forgive us our debts, as we also have forgiven our debtors."); (*Matthew* 6:14-15, "For if you forgive other people when they sin against you, your heavenly Father will also forgive you. But if you do not forgive others their sins, your Father will not forgive your sins."); (*Deuteronomy*, 15:1 "At the end of every seven years you must cancel debts."); (*See also, Matthew*, 18:21-35. Debts once forgiven will be remembered if we do not forgive others.); (Jesus teaches "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* 16:26.); (Jesus teaches us do not seek after material things, "but seek first his kingdom and his righteousness, and all these things will be given to you as well." *Matthew* 6:30-33.); (With regards to eternal treasure we are commanded to share his word without pay as without pay we received the gift of the way to eternal life, through the word. *Citing, Matthew* 10:8).

11. If people don't forgive monetary debts by those who have no means to pay, other than selling their souls for labor, I believe people will be damned to hell for loving money and material gain more than one another as commanded. We are commanded to love people, not money and the things it can buy. (See, *John* 13:34-35, "A new command I give you: Love one another. As I have loved you, so you must love one another. By this everyone will know that you are my disciples, if you love one another.")

12. Since I am commanded to love people, I do not want to create a situation where I increase the odds, they will be damned to hell by accruing profit off of debt. I do not want to be damned to hell by seeking money in place of God as my savior due to indebtedness. Debt is against my religious beliefs because it makes money guide and savior instead of Jesus as guide and savior.

13. Interest on alleged debt, and debt is against my religious beliefs as I believe it increases servitude to Satan by teaching people to be enslaved to earning money to pay artificial interest or debt, instead of being free in Christ, essentially making money the savior in place of God. (See, *Leviticus* 25:36-37, "Do not take interest or any profit from them, but fear your God, so that they may continue to live among you. You must not lend them money at interest or sell them food at a profit." and *Exodus* 22:24-26).

14. It is my genuine religious belief charging interest or a fee on money lent or artificial debt is a sin against God, I believe misleading many to hell by indebtedness to the pursuit of money, instead of God. (*Ezekiel* 18:13, "He lends at an interest and takes at a profit. Will such a man live [By live, I believe it means losing eternal life in the second death should he not repent]. He will not! Because he has done all these detestable things, he is put to death; his blood will be on his own head."); (*Deuteronomy* 23:19, "Do not charge your brother interest on

money, food, or any other type of loan.”); (*Proverbs* 28:8, He who increases his wealth by interest and usury lays it up for one who is kind to the poor.); (*Exodus* 22:25, “If you lend money to one of my people among you who is needy, do not treat it like a business deal; charge no interest.”); (*Deuteronomy* 15:2 “This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD’s time of release has been proclaimed.”)

15. I believe it is a great sin to go into debt, and an even greater sin to require a person to go into debt to exercise fundamental freedoms, that are no longer free, but for sale to those who can afford to buy the ability to exercise Constitutional 1st Amendment liberties, the wealthy, rendering the poor less equal, no longer free, but for sale bought people, as wage slaves, in violation of the 13th Amendment, and Equal Protection Clause of the 14th Amendment applicable to the states, and the Equal Protections component of the 5th Amendment applicable to the Federal government, with government support.

16. The Delaware Disciplinary Order and this reciprocal orders prevent me from returning to my former law firm, and may prevent me from getting a job as a lawyer to render any fees impossible to pay back. In addition, asking for donations is against my religious beliefs as I believe people are misled to hell by *Matthew* 6:1-4 violations of organized charity, fundraising and pro bono.

17. Going into debt, of even a few dollars, is against my religious belief, and the additional costs of even a few dollars is a substantial burden upon my access to the courts due to my utter poverty, and my inability to pay back any fees should my appeal fail.

18. I respectfully request that no fees or costs relating to this case be required of me due to such costs creating an economic strain upon my exercise of the access to the courts to

defend 1st Amendment rights, as a substantial burden due to my poverty, with little prejudice to respondent, the public or this Honorable Court, and due to violations, such cost requirements create upon my exercise of my religious beliefs.

19. This Court must not require I violate my religious beliefs by agreeing to personal indebtedness should costs arise in order to exercise my 1st and 5th Amendment rights to petition this Court to safeguard my exercise of Constitutionally protected activity from government interference or retaliation including the right, to petition, exercise religious beliefs, freely speak concerning my religious beliefs for which my petitions relate to and the freedom to associate.

20. In order for this Court to require I consent to costs which violates my religious beliefs, compromising my faith in Jesus to servitude to Satan by making money God by costs, and potential costs relating to this matter, the Court must have a compelling interest somehow more important than the free exercise of religion, narrowly tailored to support such interest.

21. The Court may not require forced indebtedness through costs and fees in violation of my religious beliefs and the 13th Amendment protections against forced labor to pay debt because its justification to compel forced violations of my religion is not narrowly tailored in this case, since the Court may grant an exemption to prevent the government forced violation of my religious beliefs.

22. The rule of law is not a business where only those with money may purchase justice. Justice is not for sale by barter or exchange, but must be determined by truth under the Constitutional principles that protect individual freedom of conscience from the forced, collective conditional will of mobs or entities by the vote or otherwise.

23. As a child of God, I believe we each must use our individual conscience mind to choose to do God's will or not in order to have any hope of eternal life.

24. The freedom to think and believe by the dictates of our own conscience instead of the government's compelled, conditional, controlled, conformed thoughts based on the ever-evolving fickle thoughts or fads of experts or entities or associations, or foreign and private backed partners is the source of all freedom in this country.

25. It is insulting the state of Delaware, and the PA reciprocating court declare me mentally disabled and unfit to practice law, but for my faith in Jesus Christ.

26. Any costs create a substantial burden and obstacle to my access to the Courts in contravention to my Equal Protection to the 1st Amendment right to access to the Courts to defend my exercise of fundamental rights applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes; *See, Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification."); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.")

27. "Because this case implicates the [Constitutionally protected rights of exercise of religion, speech, petition, belief and association and the] right of access to the courts," the government's disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test. *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

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

29. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness is protected. In addition, fundamental rights are implicated. Delaware Disciplinary Counsel and Delaware agents violated my Fundamental rights of religious beliefs, religious-political speech, religious-political petitions, religious-political-association, religious-political exercise, procedural and substantive due process opportunity to be heard, to prepare and present evidence, to subpoena witnesses, and to cross examine my accuser.

30. Pennsylvania Disciplinary Counsel and reciprocating courts persecute me and seek to defame my character by taking away my property interest in my active license to practice law but for my exercise of Constitutionally protected conduct, in violation of my freedom to petition concerning my religious-political speech, religious-political exercise, religious-political belief, religious-political association, and association as a party, attorney, Democrat, Catholic and Christian when I believe there has been a grievance committed against me.

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

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden,

has only the right to a meaningless ritual, while the rich man has a meaningful appeal." Douglas, 372 U.S., at 357-358

32. Court costs, as applied, violate my religious beliefs, religious practices and religious exercise against incurring debt, and costs, as applied. I seek protections under the 5th Amendment's Equal Protection component, as a party of one, with unique religious beliefs to gain access to the courts to defend my exercise of 1st, 5th and 14th Amendment liberties.

Wherefore, I, Meghan M. Kelly, Plaintiff, Plaintiff respectfully pray the Court grant me leave to file in forma pauperis and an exemption from taxes and costs.

Dated: 5/28/2023

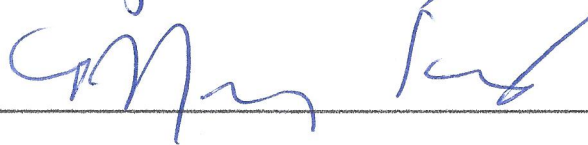
Respectfully submitted,

/s/ Meghan Kelly
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(2,653 Words)
United States Supreme Court No.283696

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
under the penalty of perjury.

Dated: May 28, 2023

Meghan Kelly (printed)

 (signed)