Appendix F

Office of Disciplinary Counsel
SUPREME COURT OF THE STATE OF DELAWARE

The Renaissance Centre
405 N. King Street, Suite 420
Wilmington, DE 19801
(302) 651-3931
(302) 651-3939 (FAX)
https://courts.delaware.gov/odc

DAVID A. WHITE
Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ
Disciplinary Counsel

KATHLEEN M. VAVALA
Disciplinary Counsel

August 23, 2021

CONFIDENTIAL
VIA EMAIL & U.S. MAIL

Meghankellyesq@yahoo.com

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

Are Christians unfit to practice law I am a follower of Jesus Christ

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

Dear Ms. Kelly:

This Office has reviewed several pleadings you have filed in the Court of Chancery and the Supreme Court in connection with the lawsuit *Meghan Kelly v. Donald Trump*. The content of these documents raise serious concerns as to your mental capacity and fitness to practice law.

Under Rule 9(a) of the Delaware Lawyers' Rules of Disciplinary Procedure, the ODC "shall screen and evaluate all information coming to its attention by complaint or otherwise concerning possible misconduct by or incapacity of a lawyer." Procedural Rule 19 (c) provides "Information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law shall be investigated by the ODC. If there are reasonable grounds to believe the interests of respondent's clients or the public are endangered, such information shall be the subject of formal proceedings 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. If, after reviewing the recommendation of the Board and upon due consideration of the matter, the Court concludes that the respondent is incapacitated from continuing to practice law, it shall enter an order transferring the respondent to disability inactive status for an indefinite period and until further order of the Court."

6. In September 2020, Respondent filed a lawsuit in the Court of Chancery 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.

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 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).

My religious beliefs are the reason this petition is brought.