

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
)	No.: 1:21-cv-01490-CFC
Defendants.)	

Appellant Plaintiff Meghan M Kelly’s Motion to stay the Proceeding until the conclusion of the appeal of this Court’s Order at 3DI 131 Order denying a stay. I further move the Court, for good cause for permission to file the “Reply to Opposing Counsel’s Brief” motion 30 days after the stay is lifted.

I, Appellant, Plaintiff Meghan M. Kelly, pursuant to 28 USC § 2101 (f)

move this Court to stay this proceeding, until a determination is made on an interlocutory appeal on this Court’s decision denying a stay in the attached Order at Third Circuit Docket originating disciplinary proceeding, until final non-appealable determinations are made on Third Circuit Docket Item (hereinafter “3DI”) 3DI 131. I further moves the Court, for good cause, for permission to file the Reply to Opposing Counsel’s Brief 30 days after the stay is lifted. I also move this Court to exempt security, damages and costs due to such taxes by this Court or Defendants causing an obstacle to my access to the courts due to poverty, and a substantial burden against my religious beliefs against debt, as a Christian, and a violation of the 13th Amendment, as applied. I aver as follows:

1. On or about January 6, 2023, this Court entered the attached Order labeled as Exhibit A, denying my Motion for a stay. (3DI 131, Exhibit A)

2. On or about February 6, 2023, I filed the attached documents with the US Supreme Court, incorporated herein by reference collectively attached hereto as Exhibit B, including

1. Application to the Honorable Justice Alito to accept my Petition for Writ of Certiorari before judgment to the Third Circuit, Case Number Case Numbers 22-8037 and 22-2079 Order to vacate a denial of a stay pending this Honorable Court's determination or denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case, should it be received more than three days after the date I mailed it, the due date
2. On Petition for Writ of Certiorari before judgment pursuant to 28 U.S.C. § 2101 (e) to the United States Court of Appeals for the Third Circuit, Case Number Case Numbers 22-8037 and 22-2079 to vacate a denial of a stay pending this Honorable Court's determination or denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case
3. And the Appendix thereto in 5 parts

2. Opposing Counsel did not state her position on this motion when I asked her to provide a stance. 3DI 103. She did not have much time to respond.

3. Any costs or fees would compel me to violate my religious beliefs against debt for a mere opportunity, not the guarantee of being heard on appeal at the US Supreme Court. (3DI 6). Any costs would require involuntary servitude to Satan, by making money savior and God to get out of debt in violation of the 13th

Amendment as applied to me. Truth should determine justice, not who has more money or connections or other things of value to barter to get their way in Court.

4. Defendants are not prejudiced by a stay whereas I face irreparable injury, loss of fundamental rights, harm to health, and property interests in my licenses to practice law as well as other harm I have outlined in my complaint and pleadings regarding amending the complaint one as a matter of right under FRCP 15. (Docket Item for the Delaware District Court (“DI”) DI 2, DI 43, DI 58).

5. On an aside, opposing Counsel Zi-Xiang Shen, Esq. is on maternity leave, and opposing counsel kindly indicated I may serve Caneel Radinson-Blasucci, Esquire paper copies only, until directed otherwise.

6. A stay is a material, not a procedural issue in my case. Should the US Supreme Court reverse this Court’s decision, it will materially affect the outcome of this case, causing conflicting judgments and duplicity of work.

Wherefore, I pray this court grants this motion.

February 7, 2023,

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire

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(302) 493-6693

Retired Bar No. 202268, INACTIVE, not
practicing law Pro se party
(Word Count 610)

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: 2/7/23

Meghan Kelly (printed)

Meghan Kelly (signed)

Exhibit A

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CCO-028

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ;
DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE,
Chief Disciplinary Counsel; OFFICE DISCIPLINARY COUNSEL;
BOARD ON PROFESSIONAL RESPONSIBILITY OF THE
SUPREME COURT OF THE STATE OF DELAWARE;
PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL
DELAWARE

(D. Del. No. 1-21-cv-01490)

Present: PHIPPS, Circuit Judge

1. Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days.
2. Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 to Stay Appeals while Appellant Petitions the Supreme Court of the United States to Review the State-Court Disciplinary Decision and the Third Circuit's Reciprocal Disciplinary Decision

Respectfully,
Clerk/pdb

ORDER

The foregoing Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days is granted. Beyond this extension, this order provides no other relief. The motion to stay these appeals is denied.

By the Court,

s/ Peter J. Phipps
Circuit Judge

Dated: January 6, 2023

PDB/cc: Meghan M. Kelly, Esq.

Caneel Radinson-Blasucci, Esq

Zi-Xiang Shen, Esq.

Exhibit B

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

Application to the Honorable Justice Alito to accept my Petition for Writ of Certiorari before judgment to the Third Circuit,

Case Number Case Numbers 22-8037 and 22-2079 Order

to vacate a denial of a stay pending this Honorable Court's determination or denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case, **should it be received more than three days after the date I mailed it, the due date**

I Meghan Kelly, Esq., pursuant to United States Supreme Court Rule 30, and Fed. R. App. P. 2, in the interest of justice I move this Honorable United States Supreme Court for an extension of time to file a writ of Certiorari to appeal the attached Order by the Third Circuit Court of Appeals denying a stay in the Civil Rights proceeding relating to a Delaware Disciplinary placing my active license to practice law on inactive disabled but for the exercise of my First Amendment private rights, I intend to appeal to this Honorable Court, due to extraordinary

circumstances, where I face immediate irreparable injury in terms of loss of my First Amendment rights, and loss of my property interests in my licenses to practice law. I aver.

1. There are 5 other reciprocal disciplinary suits. A stay in this civil rights case may grant me relief in other courts to preserve my life, health, liberties and I believe my eternal life.

2. I also believe the courts are in danger. I do not need to agree with all of your opinions to uphold my duty to protect you as the Courts are the protectors of individuals and individual liberties.

3. Under information and belief, it is a national emergency when the courts are threatened, and there is evidence of a plan to eliminate you.

4. As imperfect people, we need imperfect judges to analyze the unique, not standardized facts, of each case to render justice based on truth not based on the standards of automation which does not take into account free exercise of liberties which do not conform to the fixed standards by the mob through majority vote or otherwise.

5. Without people judges, it is reign by lawless lusts, by violence, bribes and extortion. Without an impartial judiciary uncontrolled by Third parties or

Congress, none are free. We are for sale products to whoever controls the government.

6. Should you think my concerns are unwarranted, please grant me time to persuade you otherwise, even if it is on another case on appeal.

7. I am not offended by those who disagree with me, or those who seek to point out my flaws. Correction helps me learn. I feel loved when others point out where I went wrong so I may improve. The caveat is I should not be destroyed and thrown away because others find my beliefs in Jesus Christ so repugnant though.

8. I understand that merely because my petition is deemed filed, does not necessitate it will be granted.

9. If my petition is granted, I will likely file applications to 1. dispense of mailing and to file everything electronically or to file only one copy, 2. to have the joint appendix based on the record without paper requirements, 3. for waiver of my right to a hearing in person due to the costs of traveling and the instability of my internet, which has been going in and out, as impracticable.

10. I did not have time to ask opposing counsel their stance. I did ask them their stance on my appeal. They have not objected.

Wherefore, I pray this Court grants my application.

Dated February 5, 2023

Respectfully submitted,
/s/Meghan Kelly
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(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 under the penalty of perjury.

Dated: February 5, 2023

Meghan Kelly
(printed)

Meghan Kelly
(signed)

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala; David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary Investigatory Committee, Attorney General Delaware

On Petition for Writ of Certiorari before judgment pursuant to 28 U.S.C. § 2101 (e) to the United States Court of Appeals for the Third Circuit, Case Number Case Numbers 22-8037 and 22-2079 to vacate a denial of a stay pending this Honorable Court’s determination or denial of writ of certiorari of before the Third Circuit Reciprocal Disciplinary Case and the Delaware Disciplinary case

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Pro Se, not represented by
Counsel
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QUESTIONS PRESENTED

1. Whether the Third Circuit abused its discretion by denying my Motion to stay the civil rights proceeding relating to civil rights violations against me by Defendants for petitioning the Delaware Supreme Court 1. for an exemption from bar dues for all attorneys facing hardship, paying the dues since the Court required I petition individually, and separately petitioning for relief for all attorneys similarly situated in order not to compel the Court to violate the Equal Protections Clause since other attorneys faced hardship, 2. in a Delaware religious Freedom Restoration Act case Kelly v Trump US Supreme Court Number 21-5522, 3. years of ignored petitions regarding religious beliefs that were ignored and thus denied, which I may not discuss herein, and the subsequent Delaware Lawyer Discipline law suit brought against me about 9 days after I filed this Civil rights case in retaliation with political-religious-poverty animus for my private-religious-political petitions, containing my private-religious beliefs in the speech in my private petitions, given procedural due process violations in both Kelly v Trump and the Delaware Disciplinary Matter, and ongoing reciprocal disciplinary cases, which may be stayed by this Court's finding, until the Delaware State Court parallel discipline decision and Third Circuit of Appeals parallel discipline decision is determined by the US Supreme Court or until a writ of petition for Certiorari is denied, or the time for appeal has tolled under the extraordinary circumstances to:

- i. prevent duplicity of potentially conflicting decisions in parallel disciplinary cases in the 1. State of Pennsylvania, 2. District Court Eastern District of Pennsylvania, 3. Disciplinary case in the Third Circuit Court of Appeals, 4. Delaware District Court 5. Appeal of the Delaware Disciplinary Matter, 6. And the civil rights case which is the subject of this petition, all relating to the same subject matter, based on the Delaware

Supreme Court's decisions, setting precedent for other reciprocal cases to continue under the extraordinary facts of my case, where the Delaware's decision may be overturned or affirmed, unless this court reverses the Third Circuits Order denying a stay.

- ii. prevent potentially needless unaffordable costs relating to duplicated litigation on the same issues from becoming a substantial burden upon my access to the courts, creating an obstacle so great as to deny me access to the courts to defend my license and exercise of fundamental rights, given my poverty and religious objection to debt,
- iii. prevent a government compelled violation of my religious belief against indebtedness in order to exercise my right to petition the Court in defense of the exercise of fundamental rights and license(s) by increase in needless, duplicative costs,
- iv. 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 reflected in my speech contained in my private petitions,
- v. prevent the risk of loss of my fundamental rights to religious belief, religious exercise of beliefs, political and religious speech, association and the right to privately petition to the courts to address grievances to safeguard my exercise of religious belief without state persecution but for disagreement with my religious-political speech contained in my petitions, before the Delaware Courts.
- vi. prevent the chilling of the exercise of First Amendment liberties by the public or other professionals who may fear reprisal in the form of the loss of their license or being deemed mentally disabled but for their exercise of individual liberties merely because the State disagrees with their First Amendment beliefs, or their petitions or

their attempt to hold the government, including government agents of both state and federal government to the limits of the Constitution.

- vii. prevent harm to my health and life. My health has diminished. I require time to maintain my health and life, in light of my specific permanent weakness related to a past surgery in my youth, which Defendants and all courts in related litigation have been apprised of, even the Delaware Chancery and Supreme Court. Without time to accommodate my weaknesses my health will diminish further, jeopardizing my life. (Citing, US Amendments I, V, XIII).
- viii. There is a reasonable probability that four Justices will consider the issue sufficiently meritorious to grant certiorari or to note probable jurisdiction; (2) a fair prospect that a majority of the Court will conclude that the decision below was erroneous; and (3) a likelihood that irreparable harm will result from the denial of a stay.
- ix. The public, the Court and the Defendants are not prejudiced by the stay. In addition, in my other appeal and on the record below in this case, I indicate my belief the courts are in danger. I believe my appeal for the Third Circuit matter may stifle the plans to eliminate courts, before a far worse scheme is implemented. I must be afforded an opportunity to provide evidence of my belief. It is the mere opportunity to be heard I seek to protect not the guarantee. Nevertheless, I attach some documents alluding to banks taking over the Courts, to ultimately take over governing. There are real plans for this Supreme Court's harm. It is a national emergency to eliminate the impartial rule of law to be reigned by bribes or extortion or violence. That is how I see the other two branches misbehaving by giving money to fuel war under the guise of money as savior or violence under the lie forced control

by violence grants freedom. It is through words of truth and justice in the courts that we may maintain these United States.

- x. The public is harmed if a stay is not granted.
- xi. The balance of the equities require a stay to prevent the loss of my fundamental rights because I had the courage to imperfectly defend them in the Delaware Courts.

LIST OF PARTIES

The parties are listed on the caption.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. The Original disciplinary case in Delaware Supreme Court matter No. 22-58. Reciprocal disciplinary cases Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372, Delaware District Court No. 22-341, PA Supreme Court No 2913, DD3. DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction. *Kelly v Trump* Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 21-5522, *Kelly v Democrats* Chancery Court No 2020-0157, **US Supreme Court No. 22-6584.**

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Appendix M Appellant Plaintiff Meghan M Kelly’s Motion to stay the Proceeding until the conclusion of the originating disciplinary proceeding, until final non-appealable determinations are made or the time of appeal has lapsed. I further move the Court, for good cause for permission to file the “for cause” motion 30 days after the stay is lifted, dated January 4, 2023. (3DI-129).....4, 12

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Appendix S A-5, Appellant’s Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation, Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, dated **February 5, 2021**; attachment relating my concerns relating to recent US Supreme Court cases. (3DI-121-12, DI 4).....5,9,11, 12, 26

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https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ (3DI 121-15, page 1-2) Discussing eliminating lawyers by automation.....30

Appendix HH *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> Discussing the schemed elimination of the fiat currency to scheme to eliminate judges and the rule of law by the rule of automation by the lie technology knows best. (3DI 91-6, pages 3-6, 3DI 91-5, pages with writing, 3DI-105, plain pages the entire book DI 3).....30

Appendix II *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>. (3DI-105-14, filed December 2, 2022) This talks about elimination of politicians. I do not have time to pull all of the references to elimination of government officials in all materials at the WEF.....30

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Appendix KK (3DI-121-14, pages 1-5) *Robot justice: China’s use of Internet courts* By Tara Vasdani This article was originally published by The Lawyer’s Daily (<https://www.thelawyersdaily.ca/>), part of LexisNexis Canada Inc., printed December 15, 2022, by save PDF print.....30

Appendix LL, Article by Bank of International Settelements (hereinafter “BIS”), the global money changer who makes money out of nothing, and gains more the worse off humanity is in, in terms of debt control and profit on interest who on or about **December 5, 2022**, indicated state, local and federal **pensions will not be paid**. They were written off as tax breaks in debt swaps, and another article indicating the same.....30

Appendix MM Excerpts of the book, *Creature of Jekyll 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 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. (DI 4-9).....30

Appendix NN Letter to Delaware Supreme Court, dated August 29, 2022, with footnotes showing how the private federal Reserve coining federal reserve notes enslaves the government and the governments people in violation of US Amend XIII, with attachments showing the more debt, the worse off the country is in the more profit and power the shareholders of the Federal Reserve, commercial banks get in their business transactions despite not collecting shares at the Federal Reserve as shareholders (3DI91-4).....30

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IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

The opinion of the Third Circuit Court of Appeals to review the merits appears at Appendix (“App.”) A, dated January 6, 2023. There is no opinion to publish.

JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254 and 28 U. S. C. § 2101(e).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Pertinent statutory provisions are reprinted in the appendix to this brief, App 1-a.

STATEMENT OF THE CASE

I. Background of the DE-Disciplinary Matter and DE Civil rights Case with argument a stay is required to preserve my life and health

This case arises from Defendants, the Delaware Courts and the arms of the Court interference in my RFRA law suit against former President Donald J. Trump in an attempt to intimidate me a to cause me to forgo my case based on the Defendants disdain for my religious-political beliefs contained in my speech, in my petitions, or poverty. (Docket Item of the District Court “DI” DI 2-4, Third Circuit Docket Item “3DI” 3DI)

I initially brought Kelly v Swartz, et al, on or about October 25, 2021, for equitable relief, and **damages** caused by the Delaware disciplinary counsels’, court members’ and the State’s interference in my Religious Freedom Restoration Act lawsuit (“RFRA”) against former

President Donald J. Trump (referred to as “Kelly v Trump”), in violation of 42 USC §§§ 1983, 1985, 1988. I sought claims for emotional distress, First Amendment violations, loss of employment opportunities, or other economic harm, and harm to my reputation. (DI 2-4, 3DI-118-4, Complaint in the District Court with Exhibits thereto).

I also sought claims for Defendants’ selective prosecution in bringing a disciplinary action against me to demean my reputation by placing me on inactive disabled to conceal Defendants’ misconduct in collusion with the Delaware Supreme Court, and to punish me for exercising the right to access the courts and First Amendment rights, based on Defendants’ disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. *Id.*

I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from *Kelly v Trump*. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and *Kelly v Trump* due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85, Attached January 24, 2022 Motion to Amend the Complaint at 3DI-43 App. C). The District Court never made a ruling on my motion(s) to amend the Complaint, unless App. B was meant to rule on those outstanding motions too. I have a right to amend the Complaint once before the service of the Complaint. FRCP 15. (App. C,D,F,G,H,I,K,

incorporated herein by reference). The Complaint has not been served. I reserved the right to amend my complaint in my Brief on appeal, as a matter of right, and in other cited documents prior to the District Court rendering an order which is the basis of this appeal. (3DI-98, App D), and Id).

The facts are changing constantly, Patricia Swartz left the ODC and is working for the state at another arm's office. Two of the judges I sought to add to the law suit are leaving the Delaware Supreme Court possibly to evade the law suit per the attached motion to recuse the Honorable Justice Reeves, I incorporate herein by reference. (3DI-128, App. E) In Motion(s) for reargument in the District Court, I pled my need to amend the Complaint to include the Delaware Supreme Court members as Defendants in the proceeding since the evidence shows they violated my procedural due process in both *Kelly v Trump* and in the Delaware Disciplinary proceeding and actively secretly concealed evidence material to my case in both proceedings to fix the outcome. (DI-20, DI-21,DI-23,DI-34, DI-35, DI-36, DI-39, also see DI 58)(Citing App. C, D, F, G, H, I, J, K). I showed evidence of harassment and bad faith malicious prosecution. I even wrote the Delaware District Court a letter concerning new and additional information by Office of Disciplinary Counsel Patricia Swartz's bad faith prosecution brought to harass me and attaching documents to show she sought to fix the outcome to persecute me for my individual private religious beliefs and to cover up mistakes and misconduct instead of correcting them. (DI 29 for example App. L)

Defendants disciplinary Order caused reciprocal law suits to be filed against me in 1. the state of PA, 2. District Court for the Eastern District of Eastern District of PA, 3. Delaware District Court, and 4. Third Circuit Court of Appeals. Any determination by the United States Supreme Court on the appeal of the Original Disciplinary case will affect the 4 other disciplinary

cases and material issues in this civil rights case. A stay in this cause, would set precedent for the other cases to stay in order not to duplicate work, issue conflicting judgments, or cause a substantial needless burden to my access to the courts due to poverty and religious beliefs against debt by having to fight 6 law suits at once relating to the same subject matter. (App. H,I, J, K,L,M,N,U, P,Q,W). I incorporate my motion for permission to file in forma pauperis filed herewith simultaneously with this petition outlining my genuine religious beliefs against debt. I also incorporate herein by reference my Motion in the before the PA Supreme Court to exempt potential costs by PA-ODC and other fees, taxes or costs, which outlines my religious beliefs against debt. (App. V, 3DI-123-2).

The Third Circuit Court kindly held I may proceed on the original record in this Court reducing the need to file a complete appendix. (3D-24) This Court also kindly held, “Appellant need not conform to structure of a formal brief and may submit one principal brief not to exceed 45 pages.” (3D-67) I incorporate my appellate brief and all documents referred therein by reference. (3DI-98, App. D)

I do not want to risk eliminating my right to access to the courts to prevent irreparable injury in the form of the Defendants infringement upon my free exercise of religious-political belief, exercise, speech, association or my right to petition on grievances. Nor do I desire to lose my property interest in my Delaware license to practice law. A lawyer’s right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state’s disagreement with my religious-political beliefs contained in speech in religious-political petitions. So, I write with haste. Rights imperfectly asserted under the duress of days to file, are better than waiving rights for failure to file.

In my motion and corrected motion for an extension of time I indicate the importance of having people as opposed to automation to correct filing errors by the Court. I believe Court staff and judges will be reduced in number to be eliminated as schemed by participants in the World government summit and World economic forum by automation of standardized professions, including the practice of law. (3DI-95-96) I also pointed to other filing errors by other courts. Id. Errors are not the problem. Failure to correct them or retaliation against those who point them out or make them, is the problem. The Disciplinary case was brought in retaliation against me for asking the Court to correct government violations of my Constitutional right to freely exercise my religious-political beliefs, religious-political beliefs, speech, association, by exercising my right to petition to safeguard these rights from government infringement. On the record I point to retaliation by the courts, including yet not limited to the Delaware Supreme Court to correct its own or its agent or the government's agent as a problem. (DI 2 exhibit labeled, A-4, A-5, App C,D,F,G,H,I,J,K,L,R,S,T,Z,AA,BB,CC). Instead of addressing my petitions, the Delaware Supreme Court concealed them by sealing my petitions, terminating two of the Court staff I complained and prevented me from performing discovery to prevent me from discovering additional fraudulent acts to cover up its misconduct by fixing the proceeding it participated in. The retaliation discourages citizens, including me, from exercising their right to access to the courts to petition the courts to correct the Court's own errors or violations of law or errors by its arms or agents. This is one reason for this case. (DI. 2-4, 43, See, Dec 11, 2020 letter not attached to 3DI 98);(App. D, R,S,T,Z,AA,BB,C).

I also note, the Third Circuit Court chilled my meaningful access to the courts by discouraging me from contacting the Court more than once a day in an Order in retaliation for my motions to correct the Third Circuit's record to prevent irreparable prejudice against me. The

Court also discouraged me from correcting motions, as other lawyers do in the common course of filing pleadings, especially in emergencies. The Third Circuit threatened me with sanctions which violate my religious beliefs in Jesus against debt in order to chill my exercise of petitioning in this case to defend my exercise of First Amendment rights and my property interests in my licenses. US Amend I, V (3DI-90). During that time, my case manager was out on the civil rights case, and my case manager was out on the other case before the Third Circuit.

I note with prejudice that the Third Circuit's Order I sought reconsideration from is based on a false assumption, a misleading statement, that appears to be made in bad faith to cover up the Court's error that I filed an emergency motion when the record shows I mailed in the documents I sought to remove from the record. (3-DI 86-90). There is proof of postage. (3DI 87-10-11) I incorporate by reference my petitions to correct the filings, and related motions including but not limited to (3DI 87-88).

This is unacceptable. The courts are not above the Constitution. The Courts' goal is not to safeguard its mere appearance of justice by compromising actual justice which guarantees injustice. The Courts are not a business. Judges should not be concerned with their appearance or their self-serving desire to market their value or legitimacy, which eliminates impartiality by making the court's focus on fickle fads, and pleasing the mob, and doing what serves their seats instead of doing what is right, impartially under Constitutional law.

I desire to safeguard the integrity of the Courts by requiring they do not sacrifice people, and their individual exercise of their Constitutional rights, as the Defendants seek to sacrifice me for the exercise of my rights. I seek to preserve the integrity of the courts not destroy them. I do not seek to destroy this Court or the Third Circuit Court of Appeals or the Delaware Chancery Court or the Delaware Supreme Court, but I do seek to hold them to the letter of the

Constitutional law. If I am disparately treated in bad faith to fix the outcome or to throw out my case in various forums for the mere convenience of the court, and with malice and disdain towards me for my religious-political beliefs, speech, association or petitions, than others also may be unlawfully chilled by the Courts from exercising their right to access to the courts in defense of fundamental rights. US Amend I, V, XIV (DI 2-4) Such precedent in my case creates a danger to the public to serve mere business greed, profit, power and position, not good by respecting all without disparate treatment based on income or belief. I object to misleading statements noted on the Third Circuit's record made with intent to chill my exercise of the right to petition, even to petition to make corrections, in defense of my fundamental rights, or to prejudice my appeal. (3DI-77-90).

The Delaware Supreme Court placed my license on inactive, disabled on August 11, 2022, and denied my motion for rehearing on multiple issues.

The evidence shows the Delaware Supreme Court and Chancery Court or their members or agents incited or participated in the conspiracy to interfere, harass, or pressure me to forgo my case against former President Donald J. Trump, and substitution of President Biden for Donald J. Trump to protect my free exercise of religion, speech, and association from a 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 enjoiment of Executive. Order No. ("Ex. Or.") 13798, maintained and reestablished by President Biden by his enforcement of E. Or. 13798, and President Biden's enforcement of E.Or.13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. 13199, Jan. 29, 2001, as revoked by Ex. Or.13831, May 3, 3018; Ex. Or.13279, Dec. 12, 2002, as amended by

Ex. Or. 13559; No. 17, 2010; Ex. Or.13559; Nov. 17, 2010; Ex. Or. 13831, May 3, 2018 and Biden’s enactment of Ex. Or. 14015, Feb. 14, 2021 (“executive orders”). These executive orders allow money or support to be transferred between government agents and religious organizations based on a bought or bartered for partnership between government and religion, not based on safeguarding freedom from forced government religion or forced relationships with religious entities to gain the bartered for government support through such religious entities.

The money in the bought, not free union of church and state, is one reason why religious-political attacks seemed to increase 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 be bestowed to religious organizations like churches in other countries.

The Chancery Court and Delaware Supreme Court’s agents’ or members’ interference in *Kelly v Trump*, and participation in retaliation against me in instigating a petition to disbar me as an active attorney for the exercise of Constitutionally protected rights were motivated by their member’s or agent’s desire to suppress or demean or disapprove of my petitions, religious beliefs, speech, political associations, and or poverty in violation of the First Amendment applicable to Defendants pursuant to the Fourteenth Amendment and in violation of 42 USC § 1985(2)(b) and 42 USC§ 1983. While my claims for the state’s witness and party intimidation against me, including sending Court of Common Pleas Judge. Kenneth S. Clark to threaten me to cause me to forgo my appeal to the Delaware Supreme Court at the request of members of the Delaware Supreme Court, my retaliation claims by the State for my petitions relating to bar dues and *Kelly v Trump* remain. *Id.* Requiring the case be dismissed would insidiously and in bad faith time bar my claims, essentially making courts above the law allowing the whims of individual judges without restraint in terms of the Constitutional limits of state’s conduct to

preserve the liberties under the First Amendment. (3DI-128-4, the complaint, App. Nevertheless, a stay is required to prevent until the original Disciplinary proceeding is appealed to this Honorable Court to prevent irreparable injury to me in terms of loss of my right to exercise fundamental rights and my health. My case is also important to outline the limits judges may conduct themselves, not by self-regulation or by third party regulation which creates injustice and partiality towards those who regulate individual judges, but by the Constitutional limits of a case and controversy by law suit or impeachment.

The August 23, 2021 letter the District Court refers to in his memorandum refers to both the Chancery Court and the Delaware Supreme Court private-religious-political pleadings or petitions as the reason for the Defendants' petition against me to disbar me as an active lawyer based on my faith in Jesus, per paragraph 7, in the petition. (App. D,F,H,I,J,K,L,R,S,T,AA,BB, CC,) Though it is remarkable that the District Court offers assurance of the Delaware Supreme Court's jurisdiction on State, the Delaware Supreme Court, and officer's own own interference and witness tampering in Kelly v Trump in violation of Procedural Due Process and section 1985, and misconduct in the disciplinary proceeding, including concealing material evidence pleadings and witnesses and committing due process violations in violation of the 1st and 14th amendment which shock the conscience. (App F,G,H,I,J,K,M,L)

I am very upset. My religious belief and my religious exercise of belief is the most important thing in my life, and is more important than money or material gain. I should not be attacked by the individuals within the courts because the find my religious beliefs repugnant, nor should I be compelled to violate my belief in order to buy and sell as an attorney by free, not government forced choice in violation of US Amend XIII and I, in contravention of my religious beliefs.

The Delaware Supreme Court may initially have had pure motives, concern for poverty by reporting my poverty to Judge Clark and the arms of the Court. Those motives appeared to sour since the Delaware Supreme Court never responded to my second letter relating to relief from lawyer registration fees. (3DI-6, DI-2) The Court cited a case in its disciplinary order where another lawyer contested bar dues and lost.

The Delaware Supreme Court agent ignored my requests to attend a Delaware CLE, which was unusual for her, and appeared to be in conspiracy to retaliate against me and black ball me from participating in activities open to Delaware barred lawyers, based on the petition Defendants brought against me concerning my belief in Jesus. (DI-2, 3 DI-6)

In addition, one of the Delaware Supreme Court justices came into the law library and asked for federal court jury instructions, I believe to prepare to sue me or help a court agent sue. (3DI-6)

The evidence shows a member of the Chancery Court appeared to seek to sabotage my case by preventing me to almost miss my filing deadline, and by instructing me to cross off local counsel's address to prevent service, to prevent my case going forward based on her disagreement with my political, religious beliefs or to cover up mistakes or misbehavior. The same staff member appeared to write on my October 5, 2021 praecipes, and underline the praecipes I drafted on October 12, 2021 to testify and be a witness without cross examination for the appellate justices, instead of filing them as I presented them, unmarked. I did not want her to get into trouble. Delaware Supreme Court agent Attorney Robinson signed off on her, Arline Simmon's termination form as well as Katrina Kruger. I did not want the court to fire two people then prevent discovery and my request to call Arline as a witness to cover up the State court's misconduct. (DI 2-4, Citing 3 DI-6, DI 58, App. K attached praecipes, regarding the

need to amend as a matter of right, and firing of two court staff to prevent their material testimony prior to District Court's Order at DI 59).

In April, 2020, Judge Kenneth S. Clark of the Court of Common Pleas interrogated me at BJ's a bulk grocery store, located in Millsboro, DE in a threatening matter, apparently backed by the Office of Disciplinary Counsel ("ODC"), disapproving of my religious beliefs and law suit against Trump and bar due petitions. (DI 2-4, Citing 3DI-6, App. D,R,S,T).

The evidence, if accepted as pleaded shows the Delaware Supreme Court through its members or agents instigated the ODC's proceeding against me which creates manifest prejudice against me, or at the least the appearance to instigate the disciplinary proceeding against me, giving the appearance of lack of partiality, and inability to grant me a fair trial in the disciplinary matter.¹

To worsen the matters, the Delaware Supreme Court sealed my petitions in *Kelly v Trump* regarding to the Court's members, arms and agents due process violations (App. R,S, T) I attach here and incorporate herein as App. R and S.to prevent the pleadings to be used in my defense in the planned retaliatory disciplinary proceeding against me brought in bad faith, fraud and collusion to demean my character rather than to improve the administration of justice by

¹ US Const. Amend I, XIV (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) ("Petitioner is entitled to a neutral and detached judge in the first instance."); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) ("excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error. "Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party..."); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).

correcting, not concealing procedural defects by firing staff and sealing pleadings in secret to collude in the outcome of the disciplinary proceeding to demean my character. (App.C, D,F,G,H,I,J,K,L, R,S,T,Z,AA,BB,CC). I attached file and serve's proof the pleadings were sealed during Kelly v Trump. Id.

The District Court is the only Court that may address the state's intimidation and interference of me a witness and party in Kelly v Trump to cause me to forgo my case.

The District Court is the only trial Court which may determine whether both *Kelly v Trump* and the disciplinary Order are void for procedural due process defects that shock the conscience and deny me any fairness offered to most other claimants, despite the State Court's bad faith recitation of the rules, the fixed, fraudulent transcript which did not accurately transcribe my testimony. (See, *May v. Anderson*, 345 U.S. 528, 537 (1953) "It is void ... if it denies due process of law."); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments " are void for lack of due process of law, or should be set aside for error.").

The District Court is the only Court which may issue relief for damages, nominal and equitable relief including reinstating my license, or an order requiring I not violate my religious beliefs in exchange with the fundamental right to petition, or additional relief I request once afforded the opportunity to amend the complaint as a matter of right.

The State proceeding has concluded. Albeit there is an appeal before the United States Supreme Court. The District Court did not analyze any of the substance of my complaints or motions, and has abstained under *Younger*. So, the Third Circuit's review on appeal is limited as to whether *Younger* applies at this time, not the merits of my complaint and motions.

In my brief at 3DI-98, App. D, I argued in Younger does not require abstention to my case. There is no state case to abstain from. The state case has concluded. There is no bar. Even if there was a case: 1. Younger does not apply to my claims for damages. The Court erred by dismissing instead of staying the case 2. Younger does not apply to federal constitutional claims in the or ancillary claims I had no opportunity to assert on the state forum. For example, 42 U.S.C.A. §§§ 1983, 1985, 1988 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate 4. The Court erred in denying my motion to amend the complaint to include procedural and substantive due process violations, equal protections violations, and other conduct and claims that required I add the Delaware Supreme Court and the members to my complaint on January 24, 2022. (DI 43, App. C) I should be granted leave to amend the complaint, to correct any defects or arguments relating to Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rights, and government punishment for the exercise of my rights, including the right to petition. 5. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession (3DI-98, App D)

I submitted a writ of certiorari to this Court appealing the Delaware Disciplinary case and a Third Circuit reciprocal Disciplinary case No.22-6584. (App. O and P). The Delaware petition was not accepted, as of Saturday February 4, 2023, I am not in receipt of the letter regarding why it was not filed. Upon information or belief upon talking with my case manager. It

is because I filed a Motion for leave to add additional words, attached hereto and incorporated herein, prior to not simultaneously with my petition. (App .P).

On or about On or about January 4, 2023, I filed a Motion for a Stay (3DI-129), with a letter noting corrections (3DI-130) I incorporate herein in its entirety.

I filed two Motions for a stay in the Delaware District Court. (3-DI. 95-4 pages 1-183, also see App. U). The District denied my latest motions. App. B.

Per the attached Order, dated January 6, 2023, the Court granted my petition for an extension in the amount of 45 days, but denied my request for a stay. (3DI 131, 3DI-126, App. A, App. N).

The Third Circuit abused its discretion by denying my Motion for a stay in the civil case until the Delaware State Court discipline decision and Third Circuit of Appeals discipline decision is determined by the US Supreme Court or until a writ of petition for Certiorari was denied, under the extraordinary circumstances.

I respectfully request this Court pursuant to Supreme Court Rule 23 order the civil rights proceeding stayed pending an outcome before this Court or denies review for both the Third Circuit and the Delaware Disciplinary proceeding, which is based on the same subject matter.

The balance of the equities and case law regarding parallel proceedings show the Third Circuit Court committed clear error of law, assuming all facts pled are deemed true as required, clear error of law, creating manifest injustice against me. I am not practicing law. I am acting as a private person standing up for my right to live, exercise First Amendment private speech, First Amendment private religious belief, First Amendment private exercise of religious belief, First Amendment right to association, First Amendment private exercise of the right to petition

without government persecution, but for the exercise of my First Amendment rights, no matter if the State finds my belief in Jesus Christ illogical. It is not for the state to dictate who or what I worship, and my God teaches you can serve God and money. Do not seek material things what you will eat or what you will drink, seek the kingdom of God. (*Citing, Bible, Matthew 6:24-34*).

II. EXTRAORDINARY CIRCUMSTANCES WARRANT A STAY

Extraordinary circumstances warrant a stay. Other Courts in disciplinary law suits against me have simply ignored my Motions regarding a stay. The District Court for the Eastern District of PA ignored my motion for reargument on its denial for a stay. (3DI-119-1). The PA Supreme Court refused to docket two motions, a second motion, and my motion to exempt any fees, costs or taxes by the state through opposing counsel. (3DI- 122 and 123 and all sub-sections. (App. V, W, X, Y) I am threatened with harm to health and even possible death due to severe dehydration should this court not accommodate me by granting me time I require to sustain my life and health in addition to defending my liberties before the Courts. (App.DD, EE). I have religious objections to healthcare and mental healthcare. Due to bad health care, I received as a teenager, I am required to drink gallons of water and rest in order not to faint, harm my health or die. None of the Courts or disciplinary counsel care. (V,W,X, Y,DD, EE). I noticed all courts ignore my asserted requirement. I am not hiding it. I assert my right to live. I became so weak due to getting steamrolled and having to defend my faith in Jesus without government persecution that I actually collapsed at the post office causing the postal service lady to enter my information incorrectly delaying delivery by a day to PA ODC. I pled about this in another Court. I also sought relief from the PA ADA administrator because I did not want to die in order to stand up for something more important than my life here, my faith in God. Id. The state representatives denied relief in the form of time. In other reciprocating lawsuits the Courts,

the state through disciplinary counsel cared not about broken computers, broken printers, lack of resources, lack of transportation and my severe allergies with anaphylactic shock towards many toxins, or fainting because I require time to drink gallons not cups of water and rest. I have sincere religious objections to health care and mental healthcare.

I will likely overturn the Delaware Supreme Court decision on appeal for procedural due process violations. (App. C,D,F,G,H,I,J,K,L,R,S,T) It is not normal for Courts to conceal evidence in the accused favor my pleadings to fix the outcome. Nor is it normal to terminate Court staff witnesses, preventing their discovery to conceal Delaware Supreme Court collusion of concealing material witnesses necessary to my defense. The State forums disparately denied me of orders by ignoring motions or rendering email orders, lying by stating notice is sent out on a date I was not served and no opposing counsel was appointed yet, and other blatant procedural due process violations based on disdain for my religious political beliefs, speech, affiliation and petitions.

The Defendants are allowed to think my beliefs are repugnant. Even if they think my religious beliefs are offensive, people who have beliefs that allegedly repugnant are protected by the First Amendment from government persecution for their religious beliefs, speech, petitions, exercise of beliefs and affiliation. US Amend I, XIV.²

² *Tate v. Cabbage*, 210 A.2d 555, 557, (1965), (“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.”)

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

Any determination by the US Supreme Court will affect this case, albeit I seek relief for state interreference and procedural due process violations in Kelly v Trump too. The fact I have an appeal naming the Court below as a party creates a conflict of interest too.

There is evidence the Delaware Supreme Court retaliated against me for two petitions in January 2020 and February 2020, as well as petitions in Kelly v Trump. The statute of limitations will soon expire to seek relief for the retaliations against me for petitioning the Court for relief on bar dues. See, *Crane v. Fauver*, 762 F.2d 325 (3d Cir. 1985). I must be afforded meaningful opportunity to plead in the civil rights case without waiving my right to an opportunity to be heard in the other five related disciplinary law suits against me, but for suing the President to preserve the wall between religion and state.

III. Case law shows federal courts have no discretion to dismiss a parallel case. but are required to stay. A stay is required because I asked for money damages, nominal damages and equitable relief like voiding Kelly v Trump not available in the state Forum.

A stay is required since I requested relief not afforded in the state forum, including but not limited to monetary relief and relief under 42 USC § 1985 for the Defendants' interference in Kelly v Trump, in addition to relief relating to In the Matter of Meghan Kelly Case No 22-58. (DI 2-4, 20-21,34-43, 50-58., App C,D,F,H,I,J,K,L).

Only the federal Court may hear certain claims for First Amendment violations, emotional distress, loss of employment opportunities, witness interference under 1985, other economic harm, and harm to my reputation. (DI 2-4).

My claims for damages and other equitable relief were unavailable in state court. The State Court has no power to void *Kelly v Trump* during the disciplinary proceeding.

In *Deakins v. Monaghan*, the Supreme Court held only that “the District Court has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”³ Since the United States Supreme Court indicates the District Court has no

³ Citing, *Deakins v. Monaghan*, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988) “In reversing the District Court’s dismissal of the claims for damages and attorney’s fees, the Court of Appeals applied the Third Circuit rule that requires a District Court to stay rather than dismiss claims that are not cognizable in the parallel state proceeding.”); See also, *Brindley v. McCullen*, 61 F.3d 507 (6th Cir. 1995); See also *Quackenbush v. Allstate Ins. Co.*, 517 U.S. 706, 719 (1996) (“we have applied abstention principles to actions ‘at law’ only to permit a federal court to enter a stay order that postpones adjudication of the dispute, not to dismiss the federal suit altogether.”); *Lewis v. Beddingfield*, 20 F.3d 123, 124 (5th Cir. 1994). (It was proper to stay rather than dismiss the federal suit because the damages could not be claimed in the criminal prosecution.); *Jones v. Prescott*, 702 Fed. Appx. 205, 209 (5th Cir. 2017) (Younger abstention does not apply to federal suits seeking only money damages) (citing *Alexander v. Ieyoub*, 62 F.3d 709, 713 (5th Cir. 1993)); See also, *Boyd v. Farrin*, 575 Fed. Appx. 517 (5th Cir. 2014); **Third Circuit:** *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), aff’d, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (A court “has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”); *Abbott v. Mette*, No. CV 20-131-RGA, 2021 WL 327375, at *3 (D. Del. Jan. 31, 2021), report and recommendation adopted, No. 20-CV-131-RGA, 2021 WL 1168958 (D. Del. Mar. 26, 2021), aff’d, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (“As a general matter, assuming that a federal court has jurisdiction over a case, the federal court’s “obligation to hear and decide [the] case is virtually unflagging.” *Sprint Commc’ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013) (internal quotation marks and citation omitted); *Crane v. Fauver*, 762 F.2d 325 (3d Cir. 1985) (“District court should have retained jurisdiction over correctional officers’ civil rights action arising out of their discharge, even if it properly declined to exercise jurisdiction over federal claims, and stayed action pending outcome of related state proceeding where officers were relegated for prudential reasons to state proceeding which could only afford them dismissal of charges and back pay, with attorney fees only to extent that back pay award was reduced by interim earnings, but officers sought constitutional damages and attorney fees, and new complaint upon termination of state proceedings may have been time-barred.”); *Williams v. Hepting*, 844 F.2d 138, 145 (3d Cir. 1988) (The Third Circuit held, “Accordingly, we

discretion and must stay and may not dismiss my civil rights case, the Delaware District Court abused its discretion as a matter of law, as a matter of fact, creating manifest injustice against me in the elimination of the opportunity to be heard in the only forum which may offer me relief. US Amend I.

“Federal district court must stay rather than dismiss claims that are not cognizable in parallel state proceeding.” *Deakins v. Monaghan*, 484 U.S. 193, 202, 108 S. Ct. 523, 529–30, 98 L. Ed. 2d 529 (1988) I made it clear to the District Court, I pled defamation, Constitutional injury and emotional distress, by pleading damages, albeit unartfully in my original Complaint. (DI 2, 34-35). In addition, I showed my intent to seek nominal damages, damages, and equitable relief too. (D.I. 43, 58, 69-75, 77-79, App C.D, 3DI-118-4).

hold that the district court should have stayed instead of dismissed without prejudice Williams' failure-to-investigate and suggestive pretrial identification claims. Because these particular federal court claims for damages seek relief that is unavailable in Williams' ongoing state proceedings, the allegations should be stayed pending the outcome of his state court appeal on the underlying conviction.”); *Nimer v. Lichfield Twp. Bd. of Trustees*, 707 F.3d 699 (6th Cir. 2013) (*Younger* abstention applies to § 1983 damages claims, but district court must stay rather than dismiss federal suit; in other words district court has no discretion to dismiss federal suit); *Carroll v. City of Mount Clemens*, 139 F.3d 1072 (6th Cir. 1998) (when federal suit seeks damages and *Younger* is invoked, federal suit should be stayed, not dismissed; this likely will be a formality, given probable preclusive effect of state court decision); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022) (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021) (Court “stayed until the conclusion of the state disciplinary proceedings, rather than be dismissed.”), *citing*, *Kalniz*, 699 F. Supp. 2d at 975 (explaining that where a plaintiff is bringing constitutional civil rights claims in a federal court case in which *Younger* abstention was proper, the stay protects against the possibility that the statute of limitations could deprive the plaintiff of the opportunity to present the merits of her damages claims); see also *Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001) (and cases cited therein); *Yamaha Motor Corp. v. Stroud*, 179 F.3d 598 (8th Cir. 1999) (when damages are sought in § 1983 action subject to *Younger* abstention, and damages are not available in pending state proceeding, federal action should be stayed, not dismissed); *Night Clubs, Inc. v. City of Fort Smith*, 163 F.3d 475 (8th Cir. 1998) (when § 1983 complaint seeking damages is subject to *Younger* abstention, federal action should be stayed rather than dismissed).

A court must stay claims for monetary relief that cannot be redressed in the state proceeding, and may not dismiss the case. *Citing, Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021); *See, Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *1 (S.D. Ohio Mar. 7, 2022).

Staying this action is required. *See, Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022); (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”).

IV. A stay is required to prevent increased potentially needless costs from creating an obstacle to my access to the Courts in defense of my first amendment rights, and the compelled violation of my religious belief against indebtedness, duplicity of judgments, and potentially conflicting judgments coming before this honorable court, loss of my 14th amendment property interest in my license and loss of my private right to exercise First Amendment right to private religious belief, private religious exercise, private exercise of m right to petition, private right to associate and other harm

The Denial of a stay creates a risk of loss of my fundamental rights to religious belief, religious exercise of beliefs, political and religious speech, association and the right to petition to the courts to address grievances to safeguard my exercise of religious belief without state persecution but for disagreement with my religious-political speech contained in my petitions,

The denial creates potential duplicity in judgments, creating needless work and loss of resources, substantially burdening my access to the courts, creating an obstacle so great as to

deny me access to the courts to defend my license and exercise of fundamental rights, given my poverty and religious objection to debt.

The public is at danger, should my case not be overturned by setting precedent other professionals may lose their ability to buy and sell for exercise of their right to petition, or to hold the government to the Constitutional law.

The denial jeopardizes my health and life. My health has diminished. I require time to maintain my health and life, in light of my specific permanent weakness related to a past surgery, which Defendants and all courts in related litigation have been apprised of, even the Delaware Chancery and Supreme Court. Without time to accommodate my weaknesses my health will diminish further, jeopardizing my life. (App DD, EE) My life is jeopardized in a different manner. People talked about shooting me for my religious-political private beliefs, private speech and private petitions. Please refer to the Facebook exhibit and see my present sense impression or excited utterance concerning people talking about shooting me. (App. FF) Also refer to my motions to vacate the District Court Order where I indicated the police who helped me by going to look at my car with substance thrown at it due to my private religious-political speech did not make a police report. (App. F).

Fighting multiple cases relating to the same issues at once creates a substantial burden upon my access to this court and the US Supreme Court on appeal, due to time constraints, my poverty and religious beliefs against debt. (*Bible, Romans 13:8*). I require a stay from this Court in order to seek a meaningful opportunity to appeal the Delaware disciplinary order with the US Supreme Court.

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

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

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

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

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

I am utterly poor. A stay is required to prevent a substantial burden and obstacle to my access to the Courts, and compelled violation of my religious belief against debt, in contravention to my First Amendment right to access to the Courts applicable to the State via the 14th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.") *Citing, e.g., Pryor v. Brennan*, 914 F.2d 921, 923 (7th Cir. 1990); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection

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

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)

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

I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religious-political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian, without government incited persecution, but for my exercise of fundamental rights.

The Delaware Disciplinary proceeding and determination against me creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work at a law firm. The State of Delaware’s conduct

harms my reputation to make me less attractive to other employers by harming my prospects of employment by the libelous published accusations against me. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness is protected.

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

There is no compelling reason to deny my request for a stay. Defendants are not prejudiced, nor is the public. Nor is any justification narrowly tailored to meet any compelling reason. This Court must grant a stay to prevent an obstacle to my access to the courts. This Court may stay the case, with no prejudice, while potentially avoiding needless work for the court, the appellate courts and the parties.

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

V. Factor 1, Interest of the Court

The Court has a strong interest in judicial efficiency. Staying this action could restructure the proceeding in this Court because collateral estoppel could prevent re-litigation of issues adjudicated on appeal in the original matter and in the civil rights proceeding. In addition,

should the US Supreme Court vacate the original disciplinary proceeding, this case may be vacated as well. Thus, the interests of the Court weigh in favor of a stay, to prevent needless waste of judicial resources by a superseding US Supreme Court decision.

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

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

I require time to preserve my life and health too.

The public and third parties are not harmed by a stay. Yet, the public may be harmed if a stay is not granted, by setting a precedent that the state may eliminate Constitutional liberties in a government compelled exchange for the license to buy in sell in a profession. Every citizen, holding a license, may lose Constitutional rights or be in danger of being adjudicated disabled, for merely believing differently than the state, or for standing up for their religious-political beliefs in Court, should I not be granted meaningful opportunity to contest the original case on appeal to the US Supreme Court and in the civil rights case.

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

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

The Delaware Supreme Court's members concealed evidence in my favor to prejudice the fixed outcome against me in aid of the Delaware ODC. The Court denied my requests for opportunity to perform discovery and for adequate time to prepare to hide the fact they terminated two court staff who are material to my case. The Court also secretly sealed four of my pleadings in Kelly v Trump that were material to my defense. (App. D, R,S,T,Z,AA,BB,C)

The Record also evidences the State's violations of my opportunity to be heard on ignored motions. The state ignored my motions to perform discovery, opportunity to prepare and present my case, opportunity to call and cross examine witnesses in the sham proceeding brought to cover up state Court misconduct and to punish me for the exercise of my First Amendment rights.

The State Court also criticized me for noting outside circumstances as evidence of disability in its August 10, 2022 Order, while finding those circumstances, including, but not limited to vulture attacks against me and my property, to be legitimate reasons for granting an extension of time. (DI 77 Internal-Exhibit D incorporated herein by reference)

Despite having good cause to contest this reciprocal proceeding. I lack time and resources to appeal the original DE disciplinary proceeding, and the civil rights case. I am unemployed, unable to seek to return to my former law firm. I am left impoverished. My parents indicated they are not able to help me as much as they would like, during this economic down turn. My parents indicated they are actually disappointed with me. They would like me to contribute more. They have indicated they intend to cut off my inheritance. I love my parents

more than money, but I love God more and have to stand up for my faith in Jesus without government persecution. Then others even future generations may no longer be free from government compelled belief should I not have courage now.

In the interest of justice, this court must not sacrifice my meaningful opportunity to be heard in all cases, by denying a stay. This court must preserve the right for my meaningful opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

I plead with this court to grant a stay to grant me time to argue legal justification to overturn the original Delaware Order on appeal, albeit the procedural defects still permit me to argue the order is voidable before the District Court.

VII. Factor 5, Prejudice against me is Great, Irreparable injury which may be prevented by a stay, balance of equities favor granting me a stay by overturning the Third Circuit's Order

The prejudice against me should a stay remain denied is great in the form of harm to health, substantial burden upon my access to the courts, additional loss of my fundamental rights and licenses. I also face the risk of other hardships, related to the loss of the opportunity to work at my former law firm, or any law firm to earn a living in my profession.

I have good cause to contest the decision the Delaware Supreme Court made in placing me on disabled inactive. but for the exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and to make religious-political petitions. Yet I am impoverished. I lack time and resources to fight both the appeal and the civil rights case and other potential reciprocal cases simultaneously. I will face irreparable injury if a

stay is not granted. *Hilton v. Braunskill*, 481 U.S. 770 (1987). The balance of the equities require a stay be granted.

Please safeguard my opportunity to petition the courts in defense of my life, health, liberty, license, and eternal life. It is the opportunity to be heard pursuant to the Fifth Amendment applicable to the Federal Courts I seek to protect, not the guarantee of justice.

Human judges are special in that they are more powerful than Congress or the President in that they may lay down selfish desires and the desires of men or the masses to do what is right, by love. They are special in that they may reflect the image of God by love unconditionally, even for those they disagree with or whose ideas they may think are bad or repugnant like mine.

Are human judges perfect? No. It is the mere opportunity to petition them without foreclosure based on religious-political beliefs or poverty which must be protected in order not to violate the 5th Amendment Equal Protections component as applied to me as a party of one. I am impoverished, with unique religious-political beliefs. If I am not free to petition, than others may no longer be free in future generations.

VIII Time is required in the interest of national security to protect the Courts by preventing their self-regulation or third-party regulation in a different appeal

Upon information and belief, there is an agenda to eliminate fiat currency to cover up the ponzi scheme by how money is coined by enslaving people to debt and debt on interest, not merely in the US, but around the globe. This violates not only the US Amend XIII, but my

religious beliefs against debt, and interest on debt. ⁴ Justice in the courts based on truth, not profit, material gain or fads is a command in my religion. *Matthew 23:23, Amos 5:15.*

I hope the Attorney General may use a bribery statute, such as 8 U.S.C. § 201, or somehow seek a writ of mandamus against Secretary Janet Yellen pursuant 31 U.S.C. § 5112 (k) to coin money without debt or interest to pay off all debts to prevent the elimination of fiat currency and the dollar, replaced by an electronic currency that will eliminate freedoms with use down the line. This is a temporary fix. I have some other ideas based on US Amend XIII and my unique religious beliefs against debt.

This scheme to eliminate fiat currency will be used to eliminate judges first, before eliminating elected officials. Upon information and belief, the transition to eliminate fiat

⁴ *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. *Matthew 10:8*); *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.”); (*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*).

currency is a mere step in a greater scheme that must be unraveled to preserve the courts who preserve and maintain our Constitutional liberties.

I have run out of time, but I attached information relating to not only elimination of fiat currency, but alluding to elimination of people judges. App GG, HH, II, JJ, KK, LL, MM, NN, OO. There are people at the World Government Summit and World Economic Forum speaking of eliminating people lawyers and people judges, not for convenience but to eliminate the rule of law to allow their unbridled business greed to reign. That is lawlessness. Without preserving the impartiality of the courts, unregulated to the partialities of those who seek to control them, we are not free, but for sale products. My case is not to destroy the Courts and those who attacked me, but to uphold the impartial rule of law, which maintains the integrity of the courts before the public. I am sad about the two court staff who were fired. That was wrong of the Delaware Supreme Court to eliminate them, to eliminate their testimony as evidence in my cases. (DI 58, App K).

In China there are already peopleless courts for allegedly small claims. App. KK. The Delaware Courts misbehaved and are in need of guidance, not destruction. I am sad two staff were fired to conceal their testimony. Courts mustn't be partial to the appearance of justice only to give into temptations to commit the greatest of injustices by persecuting me in violation of my exercise of fundamental rights merely because I believe God is God, not money.

Justice is not to be controlled by fickle peer pressured fads or the desire for productivity and material gain, which would result in elimination of freedom and human sacrifice for money. I disapprove of the article regarding productivity of the courts. Justice is a matter of truth, of upholding free liberties, not selling them by barter or exchange in the name of productivity. (App. NN). Please uphold justice in my case to improve the integrity of the courts.

XI CONCLUSION

Wherefore, I pray this Court grants this petition, vacates the order below under and grants any relief this court deems just.

Dated: 2/6/2023

Respectfully Submitted,

/s/Meghan Kelly
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US Supreme Court Number 283696

APPENDIX 1-a

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Cons. Amend. 1

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, ... or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

U.S. Const. Amend. V Due Process and the Equal protection component

“No person shall be ... deprived of life, liberty, or property, without due process of law;” U.S. Const. amend. V

U.S. Const. Amend. XIII § 1

“Neither slavery nor involuntary servitude ... shall exist within the United States, or any place subject to their jurisdiction.”

U.S. Const. amend. XIV, § 1, Due Process

“nor shall any State deprive any person of life, liberty, or property, without due process of law”

U.S. Const. amend. XIV § 1, Equal Protection component

“nor deny to any person within its jurisdiction the equal protection of the laws.”

RULES

Supreme Court Rule 23

Rule 23. Stays

- “1. A stay may be granted by a Justice as permitted by law.
2. A party to a judgment sought to be reviewed may present to a Justice an application to stay the enforcement of that judgment. See 28 U. S. C. § 2101(f).
3. An application for a stay shall set out with particularity why the relief sought is not available from any other court

or judge. Except in the most **extraordinary circumstances**, an application for a stay will not be entertained unless the relief requested was first sought in the appropriate court or courts below or from a judge or judges thereof. An application for a stay shall identify the judgment sought to be reviewed and have appended thereto a copy of the order and opinion, if any, and a copy of the order, if any, of the court or judge below denying the relief sought, and shall set out specific reasons why a stay is justified. The form and content of an application for a stay are governed by Rules 22 and 33.2.

4. A judge, court, or Justice granting an application for a stay pending review by this Court may condition the stay on the filing of a supersedeas bond having an approved surety or sureties. The bond will be conditioned on the satisfaction of the judgment in full, together with any costs, interest, and damages for delay that may be awarded. If a part of the judgment sought to be reviewed has already been satisfied, or is otherwise secured, the bond may be conditioned on the satisfaction of the part of the judgment not otherwise secured or satisfied, together with costs, interest, and damages.”

STATUTES

28 U.S.C. § 1254 (1)

“(1) By writ of certiorari granted upon the petition of any party to any civil or criminal case, before or after rendition of judgment or decree.”

28 U. S. C. § 2101(e)

(e) An application to the Supreme Court for a writ of certiorari to review a case before judgment has been rendered in the court of appeals may be made at any time before judgment.

42 U.S.C. § 1983

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

42 U.S.C. § 1985 (2) Intimidating a party (2) Obstructing justice; intimidating party, witness, or juror

“If two or more persons in any State or Territory conspire to deter, by force, intimidation, or threat, any party or witness in any court of the United States from attending such court, or from testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party or witness in his person or property on account of his having so attended or testified, or to influence the verdict, presentment, or indictment of any grand or petit juror in any such court, or to injure such juror in his person or property on account of any verdict, presentment, or indictment lawfully assented to by him, or of his being or having been such juror; or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws”

42 U.S.C. § 1985 (3) Depriving persons of rights or privileges

“If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in

this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.”

42 U.S.C. § 1988

(a) Applicability of statutory and common law

The jurisdiction in civil and criminal matters conferred on the district courts by the provisions of titles 13, 24, and 70 of the Revised Statutes for the protection of all persons in the United States in their civil rights, and for their vindication, shall be exercised and enforced in conformity with the laws of the United States, so far as such laws are suitable to carry the same into effect; but in all cases where they are not adapted to the object, or are deficient in the provisions necessary to furnish suitable remedies and punish offenses against law, the common law, as modified and changed by the constitution and statutes of the State wherein the court having jurisdiction of such civil or criminal cause is held, so far as the same is not inconsistent with the Constitution and laws of the United States, shall be extended to and govern the said courts in the trial and disposition of the cause, and, if it is of a criminal nature, in the infliction of punishment on the party found guilty.

(b) Attorney's fees

In any action or proceeding to enforce a provision of sections 1981, 1981a, 1982, 1983, 1985, and 1986 of this title, title IX of Public Law 92-318 [20 U.S.C. 1681 et seq.], the Religious Freedom Restoration Act of 1993 [42 U.S.C. 2000bb et seq.], the Religious Land Use and Institutionalized Persons Act of 2000 [42 U.S.C. 2000cc et seq.], title VI of the Civil Rights Act of 1964 [42 U.S.C. 2000d et seq.], or section 12361 of title 34, the court, in its discretion, may allow the prevailing party, other than the United States, a reasonable attorney's fee as part of the costs, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity such officer shall not be held liable for any costs, including attorney's fees, unless such action was clearly in excess of such officer's jurisdiction.

(c) Expert fees

In awarding an attorney's fee under subsection (b) in any action or proceeding to enforce a provision of section 1981 or 1981a of this title, the court, in its discretion, may include expert fees as part of the attorney's fee.

42 U.S.C. § 1988

42 USCS § 2000bb

“(a) Findings. The Congress finds that—

- (1) the framers of the Constitution, recognizing free exercise of religion as an unalienable right, secured its protection in the First Amendment to the Constitution;
- (2) laws “neutral” toward religion may burden religious exercise as surely as laws intended to interfere with religious exercise;
- (3) governments should not substantially burden religious exercise without compelling justification;
- (4) in *Employment Division v. Smith*, 494 U.S. 872 (1990) the Supreme Court virtually eliminated the requirement that the government justify burdens on religious exercise imposed by laws neutral toward religion; and
- (5) the compelling interest test as set forth in prior Federal court rulings is a workable test for striking sensible balances between religious liberty and competing prior governmental interests.

(b) Purposes. The purposes of this Act are—

- (1) to restore the compelling interest test as set forth in *Sherbert v. Verner*, 374 U.S. 398 (1963) and *Wisconsin v. Yoder*, 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is substantially burdened; and
- (2) to provide a claim or defense to persons whose religious exercise is substantially burdened by government.”

42 USCS § 2000bb-1,

“(a) In general. Government shall not substantially burden a person’s exercise of religion even if the burden results from a rule of general applicability, except as provided in subsection (b).

(b) Exception. Government may substantially burden a person’s exercise of religion only if it demonstrates that application of the burden to the person—

- (1) is in furtherance of a compelling governmental interest; and
- (2) is the least restrictive means of furthering that compelling governmental interest.

(c) Judicial relief. A person whose religious exercise has been burdened in violation of this section may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government. Standing to assert a claim or defense

under this section shall be governed by the general rules of standing under article III of the Constitution.”

42 USCS § 2000bb-2,

“As used in this Act—

(1) the term “government” includes a branch, department, agency, instrumentality, and official (or other person acting under color of law) of the United States, or of a covered entity;

(2) the term “covered entity” means the District of Columbia, the Commonwealth of Puerto Rico, and each territory and possession of the United States;

(3) the term “demonstrates” means meets the burdens of going forward with the evidence and of persuasion; and

(4) the term “exercise of religion” means religious exercise, as defined in section 8 of the Religious Land Use and Institutionalized Persons Act of 2000 [42 USCS § 2000cc-5].”

42 USCS § 2000bb-3,

(a) In general. This Act applies to all Federal law, and the implementation of that law, whether statutory or otherwise, and whether adopted before or after the enactment of this Act [enacted Nov. 16, 1993].

(b) Rule of construction. Federal statutory law adopted after the date of the enactment of this Act [enacted Nov. 16, 1993] is subject to this Act unless such law explicitly excludes such application by reference to this Act.

(c) Religious belief unaffected. Nothing in this Act shall be construed to authorize any government to burden any religious belief.”

42 USCS § 2000bb-4

“Nothing in this Act shall be construed to affect, interpret, or in any way address that portion of the First Amendment prohibiting laws respecting the establishment of religion (referred to in this section as the “Establishment Clause”). Granting government funding, benefits, or exemptions, to the extent permissible under the Establishment Clause, shall not constitute a violation of this Act. As used in this section, the term “granting”, used with respect to government funding, benefits, or exemptions, does not include the denial of government funding, benefits, or exemptions.”

Executive Orders

Executive Orders by President Biden

Ex. Or. 14015, 86 Fed. Reg 10007, Feb. 14, 2021:

“Exec. Order No. 14015, 86 FR 10007, 2021 WL 616701(Pres.)
Executive Order 14015

Establishment of the White House Office of Faith-Based and Neighborhood Partnerships

February 14, 2021

“By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to better serve people in need through partnerships with civil society, while preserving our fundamental constitutional commitments, it is hereby ordered:

Section 1. Policy. Faith-based and other community-serving organizations are vital to our Nation’s ability to address the needs of, and lift up, low-income and other underserved persons and communities, notably including persons of color. The American people are key drivers of fundamental change in our country, and few institutions are closer to the people than our faith-based and other community organizations. It is important that the Federal Government strengthen the ability of such organizations and other nonprofit providers in our communities to deliver services effectively in partnership with Federal, State, and local governments and with other private organizations, while preserving our fundamental constitutional commitments guaranteeing the equal protection of the laws and the free exercise of religion and forbidding the establishment of religion. The Federal Government can preserve these fundamental commitments while empowering faith-based and secular organizations to assist in the delivery of vital services in our neighborhoods. These partnerships are also vital for the success and effectiveness of the United States’ diplomatic, international development, and humanitarian work around the world.

Sec. 2. Establishment. There is established a White House Office of Faith-Based and Neighborhood Partnerships (White House Partnerships Office) within the Executive Office of the President, supported by the Domestic Policy Council and the Office of Public Engagement, that will have lead responsibility in the executive branch for establishing policies, priorities, and objectives for the Federal Government’s comprehensive effort to enlist, equip, enable, empower, and expand the work of community-serving organizations, both faith-based and secular, to the extent permitted by law.

Sec. 3. Functions. The principal functions of the White House Partnerships Office are, to the extent permitted by law:

- (a) to assist in organizing more effective efforts to serve people in need across the country and around the world, in partnership with civil society, including faith-based and secular organizations;
- (b) to develop, lead, and coordinate the Administration’s policy agenda affecting faith-based and other community programs and initiatives and to optimize the role of such efforts in communities;
- (c) to ensure that policy decisions and programs throughout the Federal Government are

consistent with the policy set forth in section 1 of this order with respect to faith-based and other community initiatives;

(d) to bring concerns, ideas, and policy options to Administration leadership for assisting, strengthening, and replicating partnerships, whether financial or nonfinancial, with faith-based and other community organizations; and

(e) to promote awareness among diverse civil society leaders of opportunities to partner both financially and otherwise with the Federal Government to serve people in need and to build institutional capacity.

Sec. 4. Administration. (a) The White House Partnerships Office may make use of established or ad hoc committees, task forces, or interagency groups.

(b) The White House Partnerships Office shall be led by an Executive Director and a Deputy Director. The operations of the White House Partnerships Office shall begin within 30 days of the date of this order.

(c) The White House Partnerships Office shall coordinate with the liaison and point of contact designated by each executive department and agency (agency) with respect to this initiative.

(d) All agencies shall cooperate with the White House Partnerships Office and provide such information, support, and assistance to the White House Partnerships Office as it may request, to the extent permitted by law.

(e) In order to ensure that Federal programs and practices involving grants or contracts to faith-based organizations are consistent with applicable law, the Executive Director of the White House Partnerships Office, acting through the Counsel to the President, may seek the opinion of the Attorney General on any constitutional and statutory questions involving existing or prospective programs and practices.

Sec. 5. Amendments to Executive Orders. (a) Executive Order 13198 of January 29, 2001 (Agency Responsibilities With Respect to Faith-Based and Community Initiatives); Executive Order 13279 of December 12, 2002 (Equal Protection of the Laws for Faith-Based and Community Organizations), as amended by Executive Order 13559 of November 17, 2010 (Fundamental Principles and Policymaking Criteria for Partnerships With Faith-Based and Other Neighborhood Organizations); Executive Order 13280 of December 12, 2002 (Responsibilities of the Department of Agriculture and the Agency for International Development With Respect to Faith-Based and Community Initiatives); Executive Order 13342 of June 1, 2004 (Responsibilities of the Departments of Commerce and Veterans Affairs and the Small Business Administration With Respect to Faith-Based and Community Initiatives); and Executive Order 13397 of March 7, 2006 (Responsibilities of the Department of Homeland Security With Respect to Faith-Based and Community Initiatives), are amended by:

(i) substituting “White House Office of Faith-Based and Neighborhood Partnerships” for “White House Office of Faith-Based and Community Initiatives” and “White House Faith and Opportunity Initiative” each time they appear in those orders;

(ii) substituting “White House Office of Faith-Based and Neighborhood Partnerships” for “White House OFBCI” each time it appears in those orders;

(iii) substituting “Centers for Faith-Based and Neighborhood Partnerships” for “Centers for Faith-Based and Community Initiatives” and “Centers for Faith and Opportunity Initiatives” each time they appear in those orders; and

(iv) substituting “Center for Faith-Based and Neighborhood Partnerships” for “Center for Faith-Based and Community Initiatives” and “Center for Faith and Opportunity Initiatives” each time they appear in those orders.

(b) Executive Order 13397, as amended, is further amended by substituting, in section 1(b), “the Executive Director of the White House Office of Faith-Based and Neighborhood Partnerships (Executive Director)” for “the Director of the White House Office of Faith-Based and Community Initiatives (WHOFBCI Director)” and by substituting “Executive Director” for “WHOFBCI Director” each time it appears in the order.

Sec. 6. Revocation. Executive Order 13831 of May 3, 2018 (Establishment of a White House Faith and Opportunity Initiative), is revoked.

Sec. 7. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

THE WHITE HOUSE, February 14, 2021.

Exec. Order No. 1401586 FR 100072021 WL 616701(Pres.)”

Executive Orders by President Trump

Ex. Or. No. 13798, 82 Fed. Reg. 21675, May 4, 2017

“By the authority vested in me as President by the Constitution and the laws of the United States of America, in order to guide the executive branch in formulating and implementing policies with implications for the religious liberty of persons and

organizations in America, and to further compliance with the Constitution and with applicable statutes and Presidential Directives, it is hereby ordered as follows:

Section 1. *Policy.* It shall be the policy of the executive branch to vigorously enforce Federal law's robust protections for religious freedom. The Founders envisioned a Nation in which religious voices and views were integral to a vibrant public square, and in which religious people and institutions were free to practice their faith without fear of discrimination or retaliation by the Federal Government. For that reason, the United States Constitution enshrines and protects the fundamental right to religious liberty as Americans' first freedom. Federal law protects the freedom of Americans and their organizations to exercise religion and participate fully in civic life without undue interference by the Federal Government. The executive branch will honor and enforce those protections.

Sec. 2. *Respecting Religious and Political Speech.* All executive departments and agencies (agencies) shall, to the greatest extent practicable and to the extent permitted by law, respect and protect the freedom of persons and organizations to engage in religious and political speech. In particular, the Secretary of the Treasury shall ensure, to the extent permitted by law, that the Department of the Treasury does not take any adverse action against any individual, house of worship, or other religious organization on the basis that such individual or organization speaks or has spoken about moral or political issues from a religious perspective, where speech of similar character has, consistent with law, not ordinarily been treated as participation or intervention in a political campaign on behalf of (or in opposition to) a candidate for public office by the Department of the Treasury. As used in this section, the term "adverse action" means the imposition of any tax or tax penalty; the delay or denial of tax-exempt status; the disallowance of tax deductions for contributions made to entities exempted from taxation under section 501(c)(3) of title 26, United States Code; or any other action that makes unavailable or denies any tax deduction, exemption, credit, or benefit.

Sec. 3. *Conscience Protections with Respect to Preventive-Care Mandate.* The Secretary of the Treasury, the Secretary of Labor, and the Secretary of Health and Human Services shall consider issuing amended regulations, consistent with applicable law, to address conscience-based objections to the preventive-care mandate promulgated under section 300gg-13(a)(4) of title 42, United States Code.

Sec. 4. *Religious Liberty Guidance.* In order to guide all agencies in complying with relevant Federal law, the Attorney General shall, as appropriate, issue guidance interpreting religious liberty protections in Federal law.

Sec. 5. *Severability.* If any provision of this order, or the application of any provision to any individual or circumstance, is held to be invalid, the remainder of this order and the application of its other provisions to any other individuals or circumstances shall not be affected thereby.

Sec. 6. *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof;
or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

/S/ Donald J. Trump

THE WHITE HOUSE,

May 4, 2017.

[FR Doc. 2017-09574 Filed 5-8-17; 11:15 am]

Billing code 3295-F7-P”

Ex Or. No. 13831, 83 Fed. Reg. 20715, May 3, 2018

“Exec. Order No. 13831, 83 FR 20715, 2018 WL 2100010(Pres.)
Executive Order 13831

Establishment of a White House Faith and Opportunity Initiative

May 3, 2018

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to assist faith-based and other organizations in their efforts to strengthen the institutions of civil society and American families and communities, it is hereby ordered as follows:

Section 1. Policy. Faith-based and community organizations have tremendous ability to serve individuals, families, and communities through means that are different from those of government and with capacity that often exceeds that of government. These organizations lift people up, keep families strong, and solve problems at the local level. The executive branch wants faith-based and community organizations, to the fullest opportunity permitted by law, to compete on a level playing field for grants, contracts, programs, and other Federal funding opportunities. The efforts of faith-based and community organizations are essential to revitalizing communities, and the Federal Government welcomes opportunities to partner with such organizations through innovative, measurable, and outcome-driven initiatives.

Sec. 2. Amendments to Executive Orders. (a) Executive Order 13198 of January 29, 2001

(Agency Responsibilities With Respect to Faith-Based and Community Initiatives), Executive Order 13279 of December 12, 2002 (Equal Protection of the Laws for Faith-Based and Community Organizations), as amended by Executive Order 13559 of November 17, 2010 (Fundamental Principles and Policymaking Criteria for Partnerships with Faith-Based and Other Neighborhood Organizations), Executive Order 13280 of December 12, 2002 (Responsibilities of the Department of Agriculture and the Agency for International Development With Respect to Faith-Based and Community Initiatives), Executive Order 13342 of June 1, 2004 (Responsibilities of the Departments of Commerce and Veterans Affairs and the Small Business Administration with Respect to Faith-Based and Community Initiatives), and Executive Order 13397 of March 7, 2006 (Responsibilities of the Department of Homeland Security With Respect to Faith-Based and Community Initiatives), are hereby amended by:

(i) substituting “White House Faith and Opportunity Initiative” for “White House Office of Faith-Based and Community Initiatives” each time it appears in those orders;

(ii) substituting “White House Faith and Opportunity Initiative” for “White House OFBCI” each time it appears in those orders;

(iii) substituting “Centers for Faith and Opportunity Initiatives” for “Centers for Faith-Based and Community Initiatives” each time it appears in those orders; and

(iv) substituting “White House Faith and Opportunity Initiative” for “Office of Faith-Based and Neighborhood Partnerships” each time it appears in those orders.

(b) Executive Order 13279, as amended, is further amended by striking section 2(h) and redesignating sections 2(i) and 2(j) as sections 2(h) and 2(i), respectively.

Sec. 3. White House Faith and Opportunity Initiative. (a) There is established within the Executive Office of the President the White House Faith and Opportunity Initiative (Initiative).

(i) The Initiative shall be headed by an Advisor to the White House Faith and Opportunity Initiative (Advisor). The Advisor shall be housed in the Office of Public Liaison and shall work with that office and the Domestic Policy Council, in consultation with the Centers for Faith-Based and Community Initiatives established by Executive Order 13198, Executive Order 13280, Executive Order 13342, and Executive Order 13397, to implement this order.

(ii) The Initiative shall, from time to time and consistent with applicable law, consult with and seek information from experts and various faith and community leaders from outside the Federal Government, including those from State, local, and tribal governments, identified by the Office of Public Liaison, the Domestic Policy Council, and the Centers for Faith and Opportunity Initiatives. These experts and leaders shall be identified based on their expertise in a broad range of areas in which faith-based and community organizations operate, including poverty alleviation, religious liberty, strengthening

marriage and family, education, solutions for substance abuse and addiction, crime prevention and reduction, prisoner reentry, and health and humanitarian services.

(iii) The Advisor shall make recommendations to the President, through the Assistant to the President for Domestic Policy, regarding changes to policies, programs, and practices that affect the delivery of services by faith-based and community organizations.

(iv) Executive departments and agencies (agencies) that lack a Center for Faith and Opportunity Initiative shall designate a Liaison for Faith and Opportunity Initiatives as a point of contact to coordinate with the Advisor in carrying out this order.

(v) All agencies shall, to the extent permitted by law, provide such information, support, and assistance to the Initiative as it may request to develop public policy proposals.

(b) To the extent permitted by law, the Initiative shall:

(i) periodically convene meetings with the individuals described in section 3(a)(ii) of this order;

(ii) periodically convene meetings with representatives from the Centers for Faith and Opportunity Initiatives and other representatives from across agencies as the Advisor may designate;

(iii) provide recommendations regarding aspects of my Administration’s policy agenda that affect faith-based and community programs and initiatives;

(iv) help integrate those aspects of my Administration’s policy agenda that affect faith-based and other community organizations throughout the Federal Government;

(v) showcase innovative initiatives by faith-based and community organizations that serve and strengthen individuals, families, and communities throughout the United States;

(vi) notify the Attorney General, or his designee, of concerns raised by faith-based and community organizations about any failures of the executive branch to comply with protections of Federal law for religious liberty as outlined in the Attorney General’s Memorandum of October 6, 2017 (Federal Law Protections for Religious Liberty), issued pursuant to Executive Order 13798 of May 4, 2017 (Promoting Free Speech and Religious Liberty); and

(vii) identify and propose means to reduce, in accordance with Executive Order 13798 and the Attorney General’s Memorandum of October 6, 2017, burdens on the exercise of religious convictions and legislative, regulatory, and other barriers to the full and active engagement of faith-based and community organizations in Government-funded or Government-conducted activities and programs.

Sec. 4. Revocation of Executive Orders. Executive Order 13199 of January 29, 2001

(Establishment of White House Office of Faith-Based and Community Initiatives), and Executive Order 13498 of February 5, 2009 (Amendments to Executive Order 13199 and Establishment of the President’s Advisory Council for Faith-Based and Neighborhood Partnerships), are hereby revoked.

Sec. 5. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

THE WHITE HOUSE, May 3, 2018.

Exec. Order No. 1383183 FR 207152018 WL 2100010(Pres.)”

Executive Orders by President Obama

Ex. Or. No. 13559, 75 Fed. Reg. 71319, Nov. 17, 2010.

“Exec. Order No. 13559, 75 FR 71319, 2010 WL 4688680(Pres.)
Executive Order 13559

Fundamental Principles and Policymaking Criteria for Partnerships With Faith-Based and Other Neighborhood Organizations

November 17, 2010

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to guide Federal agencies in formulating and developing policies with implications for faith-based and other neighborhood organizations, to promote compliance with constitutional and other applicable legal principles, and to strengthen the capacity of faith-based and other neighborhood organizations to deliver services effectively to those in need, it is hereby ordered:

Section 1. Amendments to Executive Order 13279. Executive Order 13279 of December 12, 2002 (Equal Protection of the Laws for Faith-Based and Community Organizations), as amended, is hereby further amended:

(a) in section 1, by striking subsection (e), and inserting in lieu thereof the following:

“(e) ‘Specified agency heads’ means:

- (i) the Attorney General;
- (ii) the Secretary of Agriculture;
- (iii) the Secretary of Commerce;
- (iv) the Secretary of Labor;
- (v) the Secretary of Health and Human Services;
- (vi) the Secretary of Housing and Urban Development;
- (vii) the Secretary of Education;
- (viii) the Secretary of Veterans Affairs;
- (ix) the Secretary of Homeland Security;
- (x) the Administrator of the Environmental Protection Agency;
- (xi) the Administrator of the Small Business Administration;
- (xii) the Administrator of the United States Agency for International Development; and
- (xiii) the Chief Executive Officer of the Corporation for National and Community Service.”;

(b) by striking section 2, and inserting in lieu thereof the following:

“Sec. 2. Fundamental Principles. In formulating and implementing policies that have implications for faith-based and other neighborhood organizations, agencies that administer social service programs or that support (including through prime awards or sub-awards) social service programs with Federal financial assistance shall, to the extent permitted by law, be guided by the following fundamental principles:

(a) Federal financial assistance for social service programs should be distributed in the most effective and efficient manner possible.

(b) The Nation’s social service capacity will benefit if all eligible organizations, including faith-based and other neighborhood organizations, are able to compete on an equal footing for Federal financial assistance used to support social service programs.

The President

(c) No organization should be discriminated against on the basis of religion or religious belief in the administration or distribution of Federal financial assistance under social service programs.

(d) All organizations that receive Federal financial assistance under social service programs should be prohibited from discriminating against beneficiaries or prospective beneficiaries of the social service programs on the basis of religion or religious belief. Accordingly, organizations, in providing services supported in whole or in part with Federal financial assistance, and in their outreach activities related to such services, should not be allowed to discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

(e) The Federal Government must implement Federal programs in accordance with the Establishment Clause and the Free Exercise Clause of the First Amendment to the United States Constitution, as well as other applicable law, and must monitor and enforce standards regarding the relationship between religion and government in ways that avoid excessive entanglement between religious bodies and governmental entities.

(f) Organizations that engage in explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization) must perform such activities and offer such services outside of programs that are supported with direct Federal financial assistance (including through prime awards or sub-awards), separately in time or location from any such programs or services supported with direct Federal financial assistance, and participation in any such explicitly religious activities must be voluntary for the beneficiaries of the social service program supported with such Federal financial assistance.

(g) Faith-based organizations should be eligible to compete for Federal financial assistance used to support social service programs and to participate fully in the social service programs supported with Federal financial assistance without impairing their independence, autonomy, expression outside the programs in question, or religious character. Accordingly, a faith-based organization that applies for, or participates in, a social service program supported with Federal financial assistance may retain its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance that it receives (including through a prime award or sub-award) to support or engage in any explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), or in any other manner prohibited by law. Among other things, faith-based organizations that receive Federal financial assistance may use their facilities to provide social services supported with Federal financial assistance, without removing or altering religious art, icons, scriptures, or other symbols from these facilities. In addition, a faith-based organization that applies for, or participates in, a social service program supported with Federal financial assistance may retain religious terms in its name, select its board members on a religious basis, and include religious references in its organization's mission statements and other chartering or governing documents.

(h) Each agency responsible for administering or awarding Federal financial assistance for social service programs shall offer protections for beneficiaries of such programs pursuant to the following principles:

(i) Referral to an Alternative Provider. If a beneficiary or prospective beneficiary of a social service program supported by Federal financial assistance objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonable time after the date of the objection, refer the beneficiary to an alternative provider.

(ii) Agency Responsibilities. Each agency responsible for administering a social service program or supporting a social service program with *71321 Federal financial assistance shall establish policies and procedures designed to ensure that (1) appropriate and timely referrals are made to an alternative provider; (2) all referrals are made in a manner consistent with all applicable privacy laws and regulations; (3) the organization subject to

subsection (h)(i) notifies the agency of any referral; (4) such organization has established a process for determining whether the beneficiary has contacted the alternative provider; and (5) each beneficiary of a social service program receives written notice of the protections set forth in this subsection prior to enrolling in or receiving services from such program.

(i) To promote transparency and accountability, agencies that provide Federal financial assistance for social service programs shall post online, in an easily accessible manner, regulations, guidance documents, and policies that reflect or elaborate upon the fundamental principles described in this section. Agencies shall also post online a list of entities that receive Federal financial assistance for provision of social service programs, consistent with law and pursuant to guidance set forth in paragraph (c) of section 3 of this order.

(j) Decisions about awards of Federal financial assistance must be free from political interference or even the appearance of such interference and must be made on the basis of merit, not on the basis of the religious affiliation of a recipient organization or lack thereof.”;

(c) by striking section 3, and inserting in lieu thereof the following:

“Sec. 3. Ensuring Uniform Implementation Across the Federal Government.

In order to promote uniformity in agencies’ policies that have implications for faith-based and other neighborhood organizations and in related guidance, and to ensure that those policies and guidance are consistent with the fundamental principles set forth in section 2 of this order, there is established an Interagency Working Group on Faith-Based and Other Neighborhood Partnerships (Working Group).

(a) Mission and Function of the Working Group. The Working Group shall meet periodically to review and evaluate existing agency regulations, guidance documents, and policies that have implications for faith-based and other neighborhood organizations. Where appropriate, specified agency heads shall, to the extent permitted by law, amend all such existing policies of their respective agencies to ensure that they are consistent with the fundamental principles set forth in section 2 of this order.

(b) Uniform Agency Implementation. Within 120 days of the date of this order, the Working Group shall submit a report to the President on amendments, changes, or additions that are necessary to ensure that regulations and guidance documents associated with the distribution of Federal financial assistance for social service programs are consistent with the fundamental principles set forth in section 2 of this order. The Working Group’s report should include, but not be limited to, a model set of regulations and guidance documents for agencies to adopt in the following areas:

(i) prohibited uses of direct Federal financial assistance and separation requirements; (ii) protections for religious identity; (iii) the distinction between “direct” and “indirect” Federal financial assistance; (iv) protections for beneficiaries of social service programs; (v) transparency requirements, consistent with and in furtherance of existing open

government initiatives; (vi) obligations of nongovernmental and governmental intermediaries; (vii) instructions for peer reviewers and those who recruit peer reviewers; and (viii) training on these matters for government employees and for Federal, State, and local governmental and nongovernmental organizations that receive Federal financial assistance under social service programs. In developing this report and in reviewing agency regulations and guidance for consistency with section 2 of this order, the Working Group shall consult the March 2010 report and recommendations prepared by the President's Advisory Council on Faith-Based and Neighborhood Partnerships on the topic of reforming the Office of Faith-Based and Neighborhood Partnerships.

(c) **Guidance.** The Director of the Office of Management and Budget (OMB), following receipt of a copy of the report of the Working Group, and in coordination with the Department of Justice, shall issue guidance to agencies on the implementation of this order, including in particular subsections 2(h)-(j).

(d) **Membership of the Working Group.** The Director of the Office of Faith-Based and Neighborhood Partnerships and a senior official from the OMB designated by the Director of the OMB shall serve as the Co-Chairs of the Working Group. The Co-Chairs shall convene regular meetings of the Working Group, determine its agenda, and direct its work. In addition to the Co-Chairs, the Working Group shall consist of a senior official with knowledge of policies that have implications for faith-based and other neighborhood organizations from the following agencies and offices:

- (i) the Department of State;
- (ii) the Department of Justice;
- (iii) the Department of the Interior;
- (iv) the Department of Agriculture;
- (v) the Department of Commerce;
- (vi) the Department of Labor;
- (vii) the Department of Health and Human Services;
- (viii) the Department of Housing and Urban Development;
- (ix) the Department of Education;
- (x) the Department of Veterans Affairs;
- (xi) the Department of Homeland Security;
- (xii) the Environmental Protection Agency;
- (xiii) the Small Business Administration;
- (xiv) the United States Agency for International Development;
- (xv) the Corporation for National and Community Service; and
- (xvi) other agencies and offices as the President, from time to time, may designate.

(e) **Administration of the Initiative.** The Department of Health and Human Services shall provide funding and administrative support for the Working Group to the extent permitted by law and within existing appropriations.”; and

(d) by striking in the title, preamble, and section 1(c), “community” and inserting in lieu thereof “other neighborhood”.

Sec. 2. General Provisions.

(a) This order amends the requirements contained in Executive Order 13279. This order supplements, but does not supersede, the requirements contained in Executive Orders 13198 and 13199 of January 29, 2001, and Executive Order 13498 of February 5, 2009.

(b) Nothing in this order shall be construed to impair or otherwise affect:

(i) authority granted by law to an executive department, agency, or the head thereof; or

(ii) functions of the Director of the OMB relating to budgetary, administrative, or legislative proposals.

(c) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(d) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

BARACK OBAMA

THE WHITE HOUSE ,November 17, 2010.

Exec. Order No. 1355975 FR 713192010 WL 4688680(Pres.)”

Executive Orders by President Bush, Junior

Ex. Or. No. 13198, 66 Fed. Reg. 8497, Jan. 29, 2001, as amended by Ex. Or. 14015, 86 Fed. Reg 10007, Feb. 14, 2021.

“66 FR 8497, Exec. Order No. 13198, 2001 WL 34773628(Pres.)
Executive Order 13198

Agency Responsibilities With Respect to Faith-Based and Community Initiatives

January 29, 2001

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to help the Federal Government coordinate a national effort to expand opportunities for faith-based and other community organizations and to strengthen their capacity to better meet social needs in America’s communities, it is hereby ordered as follows:

Section 1. Establishment of Executive Department Centers for Faith-Based and Community Initiatives. (a) The Attorney General, the Secretary of Education, the Secretary of Labor, the Secretary of Health and Human Services, and the Secretary of Housing and Urban Development shall each establish within their respective departments a Center for Faith-Based and Community Initiatives (Center).

(b) Each executive department Center shall be supervised by a Director, appointed by the department head in consultation with the White House Office of Faith-Based and Community Initiatives (White House OFBCI).

(c) Each department shall provide its Center with appropriate staff, administrative support,

and other resources to meet its responsibilities under this order.

(d) Each department's Center shall begin operations no later than 45 days from the date of this order.

Sec. 2. Purpose of Executive Department Centers for Faith-Based and Community Initiatives. The purpose of the executive department Centers will be to coordinate department efforts to eliminate regulatory, contracting, and other programmatic obstacles to the participation of faith-based and other community organizations in the provision of social services.

Sec. 3. Responsibilities of Executive Department Centers for Faith-Based and Community Initiatives. Each Center shall, to the extent permitted by law: (a) conduct, in coordination with the White House OFBCI, a department-wide audit to identify all existing barriers to the participation of faith-based and other community organizations in the delivery of social services by the department, including but not limited to regulations, rules, orders, procurement, and other internal policies and practices, and outreach activities that either facially discriminate against or otherwise discourage or disadvantage the participation of faith-based and other community organizations in Federal programs;

(b) coordinate a comprehensive departmental effort to incorporate faith-based and other community organizations in department programs and initiatives to the greatest extent possible;

(c) propose initiatives to remove barriers identified pursuant to section 3(a) of this order, including but not limited to reform of regulations, procurement, and other internal policies and practices, and outreach activities;

(d) propose the development of innovative pilot and demonstration programs to increase the participation of faith-based and other community organizations in Federal as well as State and local initiatives; and

(e) develop and coordinate department outreach efforts to disseminate information more effectively to faith-based and other community organizations with respect to programming changes, contracting opportunities, and *8498 other department initiatives, including but not limited to Web and Internet resources.

Sec. 4. Additional Responsibilities of the Department of Health and Human Services and the Department of Labor Centers. In addition to those responsibilities described in section 3 of this order, the Department of Health and Human Services and the Department of Labor Centers shall, to the extent permitted by law: (a) conduct a comprehensive review of policies and practices affecting existing funding streams governed by so-called "Charitable Choice" legislation to assess the department's compliance with the requirements of Charitable Choice; and (b) promote and ensure compliance with existing Charitable Choice legislation by the department, as well as its partners in State and local government, and

their contractors.

Sec. 5. Reporting Requirements. (a) Report. Not later than 180 days after the date of this order and annually thereafter, each of the five executive department Centers described in section 1 of this order shall prepare and submit a report to the White House OFBCI.

(b) Contents. The report shall include a description of the department’s efforts in carrying out its responsibilities under this order, including but not limited to:

(1) a comprehensive analysis of the barriers to the full participation of faith-based and other community organizations in the delivery of social services identified pursuant to section 3(a) of this order and the proposed strategies to eliminate those barriers; and

(2) a summary of the technical assistance and other information that will be available to faith-based and other community organizations regarding the program activities of the department and the preparation of applications or proposals for grants, cooperative agreements, contracts, and procurement.

(c) Performance Indicators. The first report, filed 180 days after the date of this order, shall include annual performance indicators and measurable objectives for department action. Each report filed thereafter shall measure the department’s performance against the objectives set forth in the initial report.

Sec. 6. Responsibilities of All Executive Departments and Agencies. All executive departments and agencies (agencies) shall: (a) designate an agency employee to serve as the liaison and point of contact with the White House OFBCI; and

(b) cooperate with the White House OFBCI and provide such information, support, and assistance to the White House OFBCI as it may request, to the extent permitted by law.

Sec. 7. Administration and Judicial Review. (a) The agencies’ actions directed by this Executive Order shall be carried out subject to the availability of appropriations and to the extent permitted by law.

(b) This order does not create any right or benefit, substantive or procedural, enforceable at law or equity against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

GEORGE W. BUSH

THE WHITE HOUSE, January 29, 2001.”

Ex. Or. No. 13199, 66 FR 8497, Jan. 29, 2001, as revoked by Ex. Or No. 13831, 83 FR 20715, May 3, 2018.

“66 FR 8499, Exec. Order No. 13199, 2001 WL 34773629(Pres.)
Executive Order 13199

Establishment of White House Office of Faith-Based and Community Initiatives

January 29, 2001

***8499** By the authority vested in me as President of the United States by the Constitution and the laws of the United States of America, and in order to help the Federal Government coordinate a national effort to expand opportunities for faith-based and other community organizations and to strengthen their capacity to better meet social needs in America’s communities, it is hereby ordered as follows:

Section 1. Policy. Faith-based and other community organizations are indispensable in meeting the needs of poor Americans and distressed neighborhoods. Government cannot be replaced by such organizations, but it can and should welcome them as partners. The paramount goal is compassionate results, and private and charitable community groups, including religious ones, should have the fullest opportunity permitted by law to compete on a level playing field, so long as they achieve valid public purposes, such as curbing crime, conquering addiction, strengthening families and neighborhoods, and overcoming poverty. This delivery of social services must be results oriented and should value the bedrock principles of pluralism, nondiscrimination, evenhandedness, and neutrality.

Sec. 2. Establishment. There is established a White House Office of Faith-Based and Community Initiatives (White House OFBCI) within the Executive Office of the President that will have lead responsibility in the executive branch to establish policies, priorities, and objectives for the Federal Government’s comprehensive effort to enlist, equip, enable, empower, and expand the work of faith-based and other community organizations to the extent permitted by law.

Sec. 3. Functions. The principal functions of the White House OFBCI are, to the extent permitted by law: (a) to develop, lead, and coordinate the Administration’s policy agenda affecting faith-based and other community programs and initiatives, expand the role of such efforts in communities, and increase their capacity through executive action, legislation, Federal and private funding, and regulatory relief;

(b) to ensure that Administration and Federal Government policy decisions and programs are consistent with the President’s stated goals with respect to faith-based and other community initiatives;

(c) to help integrate the President’s policy agenda affecting faith-based and other community organizations across the Federal Government;

(d) to coordinate public education activities designed to mobilize public support for faith-based and community nonprofit initiatives through volunteerism, special projects, demonstration pilots, and public-private partnerships;

(e) to encourage private charitable giving to support faith-based and community initiatives;

- (f) to bring concerns, ideas, and policy options to the President for assisting, strengthening, and replicating successful faith-based and other community programs;
- (g) to provide policy and legal education to State, local, and community policymakers and public officials seeking ways to empower faith-based and *8500 other community organizations and to improve the opportunities, capacity, and expertise of such groups;
- (h) to develop and implement strategic initiatives under the President's agenda to strengthen the institutions of civil society and America's families and communities;
- (i) to showcase and herald innovative grassroots nonprofit organizations and civic initiatives;
- (j) to eliminate unnecessary legislative, regulatory, and other bureaucratic barriers that impede effective faith-based and other community efforts to solve social problems;
- (k) to monitor implementation of the President's agenda affecting faith-based and other community organizations; and
- (l) to ensure that the efforts of faith-based and other community organizations meet high standards of excellence and accountability.

Sec. 4. Administration. (a) The White House OFBCI may function through established or ad hoc committees, task forces, or interagency groups.

(b) The White House OFBCI shall have a staff to be headed by the Assistant to the President for Faith-Based and Community Initiatives. The White House OFBCI shall have such staff and other assistance, to the extent permitted by law, as may be necessary to carry out the provisions of this order. The White House OFBCI operations shall begin no later than 30 days from the date of this order.

(c) The White House OFBCI shall coordinate with the liaison and point of contact designated by each executive department and agency with respect to this initiative.

(d) All executive departments and agencies (agencies) shall cooperate with the White House OFBCI and provide such information, support, and assistance to the White House OFBCI as it may request, to the extent permitted by law.

(e) The agencies' actions directed by this Executive Order shall be carried out subject to the availability of appropriations and to the extent permitted by law.

Sec. 5. Judicial Review. This order does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

GEORGE W. BUSH

THE WHITE HOUSE, January 29, 2001.”

Ex. Or. No. 13279, 67 FR 77141, December 12, 2002, as amended by Exec. Or. No. 13559, 75 FR 71319, November 17, 2010.

67 FR 77141, Exec. Order No. 13279, 2002 WL 32817723(Pres.)
Executive Order 13279

Equal Protection of the Laws for Faith-Based and Community Organizations

December 12, 2002

***77141** By the authority vested in me as President by the Constitution and the laws of the United States of America, including section 121(a) of title 40, United States Code, and section 301 of title 3, United States Code, and in order to guide Federal agencies in formulating and developing policies with implications for faith-based organizations and other community organizations, to ensure equal protection of the laws for faith-based and community organizations, to further the national effort to expand opportunities for, and strengthen the capacity of, faith-based and other community organizations so that they may better meet social needs in America’s communities, and to ensure the economical and efficient administration and completion of Government contracts, it is hereby ordered as follows:

Section 1. Definitions. For purposes of this order:

(a) “Federal financial assistance” means assistance that non-Federal entities receive or administer in the form of grants, contracts, loans, loan guarantees, property, cooperative agreements, food commodities, direct appropriations, or other assistance, but does not include a tax credit, deduction, or exemption.

(b) “Social service program” means a program that is administered by the Federal Government, or by a State or local government using Federal financial assistance, and that provides services directed at reducing poverty, improving opportunities for low-income children, revitalizing low-income communities, empowering low-income families and low-income individuals to become self-sufficient, or otherwise helping people in need. Such programs include, but are not limited to, the following:

(i) child care services, protective services for children and adults, services for children and adults in foster care, adoption services, services related to the management and maintenance of the home, day care services for adults, and services to meet the special needs of children, older individuals, and individuals with disabilities (including physical, mental, or emotional disabilities);

(ii) transportation services;

- (iii) job training and related services, and employment services;
 - (iv) information, referral, and counseling services;
 - (v) the preparation and delivery of meals and services related to soup kitchens or food banks;
 - (vi) health support services;
 - (vii) literacy and mentoring programs;
 - (viii) services for the prevention and treatment of juvenile delinquency and substance abuse, services for the prevention of crime and the provision of assistance to the victims and the families of criminal offenders, and services related to intervention in, and prevention of, domestic violence; and
 - (ix) services related to the provision of assistance for housing under Federal law.
- (c) “Policies that have implications for faith-based and community organizations” refers to all policies, programs, and regulations, including official *77142 guidance and internal agency procedures, that have significant effects on faith-based organizations participating in or seeking to participate in social service programs supported with Federal financial assistance.
- (d) “Agency” means a department or agency in the executive branch.
- (e) “Specified agency heads” mean the Attorney General, the Secretaries of Agriculture, Education, Health and Human Services, Housing and Urban Development, and Labor, and the Administrator of the Agency for International Development.

Sec. 2. Fundamental Principles and Policymaking Criteria .

In formulating and implementing policies that have implications for faith-based and community organizations, agencies that administer social service programs supported with Federal financial assistance shall, to the extent permitted by law, be guided by the following fundamental principles:

- (a) Federal financial assistance for social service programs should be distributed in the most effective and efficient manner possible;
- (b) The Nation’s social service capacity will benefit if all eligible organizations, including faith-based and other community organizations, are able to compete on an equal footing for Federal financial assistance used to support social service programs;
- (c) No organization should be discriminated against on the basis of religion or religious belief in the administration or distribution of Federal financial assistance under social service programs;
- (d) All organizations that receive Federal financial assistance under social services programs should be prohibited from discriminating against beneficiaries or potential beneficiaries of the

social services programs on the basis of religion or religious belief. Accordingly, organizations, in providing services supported in whole or in part with Federal financial assistance, and in their outreach activities related to such services, should not be allowed to discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to actively participate in a religious practice;

(e) The Federal Government must implement Federal programs in accordance with the Establishment Clause and the Free Exercise Clause of the First Amendment to the Constitution. Therefore, organizations that engage in inherently religious activities, such as worship, religious instruction, and proselytization, must offer those services separately in time or location from any programs or services supported with direct Federal financial assistance, and participation in any such inherently religious activities must be voluntary for the beneficiaries of the social service program supported with such Federal financial assistance; and

(f) Consistent with the Free Exercise Clause and the Free Speech Clause of the Constitution, faith-based organizations should be eligible to compete for Federal financial assistance used to support social service programs and to participate fully in the social service programs supported with Federal financial assistance without impairing their independence, autonomy, expression, or religious character. Accordingly, a faith-based organization that applies for or participates in a social service program supported with Federal financial assistance may retain its independence and may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct Federal financial assistance to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations that receive Federal financial assistance may use their facilities to provide social services supported with Federal financial assistance, without removing or altering religious art, icons, scriptures, or other symbols from these facilities. In addition, a faith-based organization that applies for or participates in a social service program supported with Federal financial assistance may retain religious terms in its organization's name, *77143 select its board members on a religious basis, and include religious references in its organization's mission statements and other chartering or governing documents.

Sec. 3. Agency Implementation.

(a) Specified agency heads shall, in coordination with the White House Office of Faith-Based and Community Initiatives (White House OFBCI), review and evaluate existing policies that have implications for faith-based and community organizations in order to assess the consistency of such policies with the fundamental principles and policymaking criteria articulated in section 2 of this order.

(b) Specified agency heads shall ensure that all policies that have implications for faith-based and community organizations are consistent with the fundamental principles and policymaking criteria articulated in section 2 of this order. Therefore, specified agency heads shall, to the extent permitted by law:

(i) amend all such existing policies of their respective agencies to ensure that they are consistent with the fundamental principles and policymaking criteria articulated in section 2 of this order;

(ii) where appropriate, implement new policies for their respective agencies that are consistent with and necessary to further the fundamental principles and policymaking criteria set forth in section 2 of this order; and

(iii) implement new policies that are necessary to ensure that their respective agencies collect data regarding the participation of faith-based and community organizations in social service programs that receive Federal financial assistance.

(c) Within 90 days after the date of this order, each specified agency head shall report to the President, through the Director of the White House OFBCI, the actions it proposes to undertake to accomplish the activities set forth in sections 3(a) and (b) of this order.

Sec. 4. *Amendment of Executive Order 11246.*

Pursuant to section 121(a) of title 40, United States Code, and section 301 of title 3, United States Code, and in order to further the strong Federal interest in ensuring that the cost and progress of Federal procurement contracts are not adversely affected by an artificial restriction of the labor pool caused by the unwarranted exclusion of faith-based organizations from such contracts, section 204 of Executive Order 11246 of September 24, 1965, as amended, is hereby further amended to read as follows:

“SEC. 204 (a) The Secretary of Labor may, when the Secretary deems that special circumstances in the national interest so require, exempt a contracting agency from the requirement of including any or all of the provisions of Section 202 of this Order in any specific contract, subcontract, or purchase order.

(b) The Secretary of Labor may, by rule or regulation, exempt certain classes of contracts, subcontracts, or purchase orders (1) whenever work is to be or has been performed outside the United States and no recruitment of workers within the limits of the United States is involved; (2) for standard commercial supplies or raw materials; (3) involving less than specified amounts of money or specified numbers of workers; or (4) to the extent that they involve subcontracts below a specified tier.

(c) Section 202 of this Order shall not apply to a Government contractor or subcontractor that is a religious corporation, association, educational institution, or society, with respect to the employment of individuals of a particular religion to perform work connected with the carrying on by such corporation, association, educational institution, or society of its activities. Such contractors and subcontractors are not exempted or excused from complying with the other requirements contained in this Order.

(d) The Secretary of Labor may also provide, by rule, regulation, or order, for the exemption of facilities of a contractor that are in all respects separate *77144 and distinct from activities of the contractor related to the performance of the contract: provided, that such an exemption will not interfere with or impede the effectuation of the purposes of this Order: and provided further, that

in the absence of such an exemption all facilities shall be covered by the provisions of this Order.”

Sec. 5. General Provisions.

(a) This order supplements but does not supersede the requirements contained in Executive Orders 13198 and 13199 of January 29, 2001.

(b) The agencies shall coordinate with the White House OFBCI concerning the implementation of this order.

(c) Nothing in this order shall be construed to require an agency to take any action that would impair the conduct of foreign affairs or the national security.

Sec. 6. Responsibilities of Executive Departments and Agencies. All executive departments and agencies (agencies) shall:

(a) designate an agency employee to serve as the liaison and point of contact with the White House OFBCI; and

(b) cooperate with the White House OFBCI and provide such information, support, and assistance to the White House OFBCI as it may request, to the extent permitted by law.

Sec. 7. Judicial Review.

This order is intended only to improve the internal management of the executive branch, and it is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by a party against the United States, its agencies, or entities, its officers, employees or agents, or any person.

GEORGE W. BUSH”

APPENDIX A

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CCO-028

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,
Appellant

v.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ;
DISCIPLINARY COUNSEL KATHLEEN M. VAVALA; DAVID A. WHITE,
Chief Disciplinary Counsel; OFFICE DISCIPLINARY COUNSEL;
BOARD ON PROFESSIONAL RESPONSIBILITY OF THE
SUPREME COURT OF THE STATE OF DELAWARE;
PRELIMINARY INVESTIGATORY COMMITTEE; ATTORNEY GENERAL
DELAWARE

(D. Del. No. 1-21-cv-01490)

Present: PHIPPS, Circuit Judge

1. Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days.
2. Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 to Stay Appeals while Appellant Petitions the Supreme Court of the United States to Review the State-Court Disciplinary Decision and the Third Circuit's Reciprocal Disciplinary Decision

Respectfully,
Clerk/pdb

ORDER

The foregoing Motion by Appellant Meghan M. Kelly in 21-3198 and 22-2079 for Extension of Time to File Brief for 45 Days is granted. Beyond this extension, this order provides no other relief. The motion to stay these appeals is denied.

By the Court,

s/ Peter J. Phipps
Circuit Judge

Dated: January 6, 2023
PDB/cc: Meghan M. Kelly, Esq.
Caneel Radinson-Blasucci, Esq
Zi-Xiang Shen, Esq.

APPENDIX B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MEGHAN KELLY, :
 :
 Plaintiff, :
 :
 v. : Civ. No. 21-1490-CFC
 :
 DISCIPLINARY COUNSEL PATRICIA :
 B. SWARTZ, et al., :
 :
 Defendants. :

MEMORANDUM ORDER

At Wilmington this Twenty-eighth day of December 2022, having considered Plaintiff's motions (D.I. 61, 62, 63, 65, 66, 69, 77, 80, 81, 82, 83, 85, 95, 96), IT IS HEREBY ORDERED that:

1. *Pro se* Plaintiff Meghan Kelly is a Delaware attorney. This case concerns her license to practice law in the State of Delaware. Plaintiff sought an order "to enjoin proceedings brought by the Defendants to place [her] attorney license on inactive disabled" status in violation of her First and Fourteenth Amendment rights. (D.I. 2 ¶ 14) On November 2, 2021, the Court denied Plaintiff's motion to expedite and letter/motion for emergency relief, dismissed as moot motions for a temporary restraining order and preliminary injunction and to e-file and appear remotely, abstained under the Younger abstention doctrine, and dismissed the Complaint. (D.I. 16, 17) Plaintiff filed notices of appeal on November 14, 2021 (USCA Case No. 21-3198) (D.I. 25), January 3, 2022 (D.I. 32), and May 9, 2022 (USCA No. 22-2079) (D.I. 67). The appeals were joined by the United States Court of Appeals for the Third Circuit with appeal No. 21-3198 as the lead case.

2. Plaintiff was granted *in forma pauperis* status in this case on October 28, 2021. (D.I. 15) The Court takes judicial notice that at one time, Plaintiff had PACER rights as an attorney. Plaintiff's PACER rights were suspended when her license was placed on inactive disabled status.

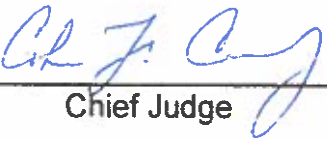
3. Plaintiff now seeks e-filing rights. (D.I. 83) That motion is **GRANTED**.

4. Plaintiff also requests a waiver of PACER fees associated with filing electronically in this Court (D.I. 62) and moves to amend that motion (D.I. 63). The motion to amend the request for waiver is **GRANTED**. (D.I. 63) The motion for a waiver of PACER fees is **GRANTED IN PART**. (D.I. 62) The United States Court of Appeals for the Third Circuit granted Plaintiff, as a non-attorney, a waiver of PACER fees. See Case No. 21-3198 at D.I. 30. In order for a waiver to be granted, a party must first have a PACER account. When a court grants a request to waive PACER fees, the Court must provide PACER with the account number to which the exemption applies and set a duration of time for the exemption. It may be that Plaintiff already has a PACER account. If she does not have a PACER account, she shall set one up. Either way, Plaintiff shall file a renewed motion for a PACER exemption in this Court, and in the motion she shall advise the Court of the PACER account number to which she wishes the exemption to apply along with a proposed duration of the exemption. Plaintiff shall file the renewed motion on or before **January, 20, 2023**.

5. Plaintiff's remaining motions are **DENIED** as they were filed subsequent to the first notice of appeal. (D.I. 61, 65, 66, 69, 77, 80, 81, 82, 85, 95, 96)

6. With the exception of a renewed motion for PACER exemption, Plaintiff is placed on notice that future filings in this Court during the pendency of Plaintiff's

appeals before the United States Court of Appeals for the Third Circuit will be docketed and not considered.



Chief Judge

APPENDIX C

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2) to include additional parties, eliminate a party, include additional facts and include additional requests for relief

Plaintiff Meghan Kelly, Pro se, January 24, 2022, brings this motion pursuant to FRCP 15(a)(1) and FRCP 15 (a)(2) to amend the complaint to include additional plaintiffs, Delaware Supreme Court, a.k.a., Supreme, Court State of Delaware, Justice Gary F. Traynor, in his official and individual capacity, pursuant to Ex parte Young, Justice Karen L. Valihura, in her official and individual capacity, Chief, Justice Collins J. Seitz, Jr., in his individual and official capacity, Justice James T. Vaughn, Jr., in his individual and official capacity, Justice Tamika R. Montgomery-Reeves, in her individual and official capacity, to eliminate a party, Preliminary Investigatory Committee, include additional facts, and include additional requests for relief.

1. The Supreme Court members participated in the subject of the petition of the Board, *Kelly v Trump*, three of the justices rendered an order in that case, Justice Gary F. Traynor, Justice James T. Vaughn, Jr., Justice Tamika R. Montgomery-Reeves.

2. The Defendants allege in the August 23, 2021 letter that the pleadings in that *Kelly v Trump* are the source of Defendant's investigation.

3. I brought the petition to protect my free exercise of religious beliefs under RFRA to safeguard my life and liberty from government incited private and government sponsored persecution. I also brought two petitions for relief from attorney dues.

4. The source of De-Lapps attacks against me was my request for waiver of attorney dues addressed to Chief Justice Seitz and the Delaware Supreme Court. The second request was ignored by the Supreme Court, affording no opportunity to be heard.

5. The entire court may have reviewed the petitions relating to attorney dues.

6. Since, a proceeding before the Board begun, the Supreme Court conspired with defendants to deny me of a fair and impartial opportunity to defend my exercise of fundamental rights at a government compelled rushed secret hearing.

7. I was denied the opportunity to recover from not feeling well, compelled to attend a hearing with little sleep, and while ill, due to allergies. Defendants do not care about health, but care more about material gain at the cost of human health and life, my health and life and liberty.

8. I was denied the opportunity to call witnesses, gather evidence, research, use such evidence to present motions or to present a defense, and cross examine witnesses.

9. I was denied the opportunity to appeal decisions by the Court's conspiracy to collude with the Board, by signaling to the Board to render decisions to my motion in a non-appealable form. The Board made a determination via an informal unsigned email.

10. I was denied adequate notice of the hearing, 19 days as opposed to 20 days. I objected and reserved my objection.

11. The Delaware Supreme Court is partial to the state, and is incapable of providing a fair opportunity to be heard or a fair proceeding.

12. The Supreme Court made a decision on my defense prior to the hearing, denying me a fair opportunity to be heard, by deeming my request to research, gather evidence to prepare and present my case as frivolous, means the Court finds my defense of 1. lack of subject matter

due to illegality of proceeding, as applied to me, disparately brought to punish me for my religious beliefs and exercise of protected conduct, 2. Lack of subject matter jurisdiction due to the fact the Supreme Court is a partial forum.

13. The Supreme Court incited and contributed to the Defendants' attacks and the petition brought against me. The Supreme Court's members include necessary witnesses, specifically Chief Justice Seitz.

14. The Defendants knew I desired to subpoena Chief Justice Seitz back in October 26, 2021. (See Exhibit A.)

15. The Supreme Court agents or members are the apparent instigators of the petition brought to punish me for my religious beliefs, or poverty, and exercise of protected conduct.

16. The Defendants seek to further compel me to violate my religious beliefs, by examination. I object to examinations on religious grounds, and should not be forced to violate my faith, because Defendants attack my faith as a mental disability. Defendants do not meet strict scrutiny.

17. I am in immediate danger, and every day the threat of additional danger increases.

18. Sadly, it appears I cannot at this time remove David White or Kathleen Vavala as they appear to be participating in the unlawfully brought proceeding against me.

19. I am removing the Preliminary Investigatory Committee in the Amended Complaint. I am also including nominal damages, requesting declaratory relief, a writ of mandamus, additional counts, and more explicitly asking for damages relating to emotional distress.

20. Defendants compelled me to attend the hearing when I was too tired and not feeling well to perform well. Defendants do not care about health or liberty just power.

21. I am so tired. I am sorry I do not have time to tailor the complaint, due to the continuous, immediate irreparable additional injuries, I continue to face. I remain in danger. Please help me.

22. Attached, please find a blackline of the changes listed as Exhibit B, and the Amended Complaint listed as Exhibit C.

22. The Defendants are not prejudiced, since service has not even been brought for the original complaint, and no attorney has made their appearance yet.

23. The attorney has notice of the additional parties as I mentioned I sought to include them in my last two motions.

Wherefore, I pray the Court grants my motion as justice requires.

Dated: January 24, 2022

Respectfully Submitted,



/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro se, not attorney
(Word Count 911)
meghankellyesq@yahoo.com
Bar Number 4968

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

Dated: January 24, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

APPENDIX D

APPENDIX D

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
)	No.: 1:21-cv-01490-CFC
Defendants.)	

**Appellant Plaintiff Meghan Kelly’s Opening Brief
moving the Third Circuit Court of Appeals to vacate the Delaware District Orders (DI, DI
16-17, 30-31, 59-60), and to remand the matter to the Delaware District Court for
consideration**

Dated October 22, 2022

Respectfully submitted,

/s/Meghan Kelly
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**IN THE THIRD CIRCUIT COURT OF APPEALS, APPEAL OF THE ORDERS
BELOW OF THE DELAWARE DISTRICT COURT**

Pursuant to 28 U.S.C. § 2106, Appellant Meghan Kelly respectfully prays this Court vacate the decisions by the Delaware District Court below (“District-Court”), (DI 16-17, 30-31, 59-60 (collectively, “District-Order”)), dismissing my Complaint under the Younger abstention, denying by not addressing my Motion to amend the complaint (DI 43), and denying subsequent rolling motion(s), motion for PACER access, motion for an exemption of PACER fees, motion to appear remotely, exemption of court costs due to costs causing a substantial burden upon my access to the courts due to poverty, and religious beliefs against poverty, motion for a stay, and all previously denied motions, except motions that may now be moot or not yet ripe for determination. (DI. 11, 12, 20, 21, 29, 33, 34, 35, 39, 41, 43, 52, 54, 58, incorporated herein by reference in its entirety). The motions that are moot for review are the motions for temporary or preliminary restraining orders and motions for expediting relief. (DI 6, 7, 8, 9, 10, 14, 18, 36, 40, 47, 48, 49, 51, 53). The Motions not yet ripe for determination were filed after the District Court’s Order, and must first be considered by the District-Court before this Court may review the District-Court’s determination. (61, 62, 63, 64, 65, 66, 69-75, 77, 80, 81, 82, 83, 85, 86, 88, 89. 90, 91, 95, 96, incorporated herein by reference).

The District Court’s decision must be set aside as clearly erroneous as a matter of law and as a matter of fact, creating manifest injustice against me. The District Court abused its discussion as to deny me the opportunity to be heard on Constitutional claims in the only forum with jurisdiction so as to render me without relief anywhere. The District Court refrained from examining the substance of my complaint and motion(s) to amend the complaints. The issue is whether the District Court has jurisdiction to hear my case. I argue Younger does not apply.

The District-Order must be vacated and this case must be remanded back to the District-Court to review the substance of my complaint, amended complaint(s), and motions.

JURISDICTION

The jurisdiction of this Court is invoked under 28 U. S. C. § 1343.

STANDARD OF REVIEW

The standard of review is de novo standard *PDX N., Inc. v. Comm'r N.J. Dep't of Labor & Workforce Dev.*, 978 F.3d 871, 882 n.11 (3d Cir. 2020).

STATEMENT OF CASE

This case arises from Defendants, the Delaware Courts and the arms of the Court interference in my RFRA law suit against former President Donald J. Trump in an attempt to intimidate me a to cause me to forgo my case based on the Defendants disdain for my religious-political beliefs contained in my speech, in my petitions, or poverty. (DI 2-4)

I initially brought Kelly v Swartz, et al, on or about October 25, 2021, for equitable relief, and **damages** caused by the Delaware disciplinary counsels', court members' and the State's interference in my Religious Freedom Restoration Act lawsuit ("RFRA") against former President Donald J. Trump (referred to as "Kelly v Trump"), in violation of 42 USC §§§ 1983, 1985, 1988. I sought claims for emotional distress, First Amendment violations, loss of employment opportunities, or other economic harm, and harm to my reputation. (DI 2-4).

I also sought claims for Defendants' selective prosecution in bringing a disciplinary action against me to demean my reputation by placing me on inactive disabled to conceal Defendants misconduct in collusion with the Delaware Supreme Court, and to punish me for

exercising the right to access the courts and First Amendment rights, based on Defendants disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. Id.

I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from Kelly v Trump. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and Kelly v Trump due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85)

I include and restate and incorporate by reference *Respondent's reply to ODC's Corrected Response to Respondent's Objections my to the Report and Recommendation of the Board on Professional Responsibility, dated June 7, 2022*, and all documents referred therein and incorporated thereto. (DI-77,) I include, restate and incorporate by this reference my Objections to the Report, the exhibits referred therein, and the Memorandum of Law ("MOL,"), and all arguments and points made in each and every one of these documents, filed on May 21, 2022, are restated in this reply. (DI. 69-75) ("Objxn" and "-" or "-Ex-" for specific exhibits therein) (DI 69-72, 75).

Per the Court's Order dated October 18, 2022, my brief is due before October 26, 2022, should my extension be denied. (3D-94-97). This Court kindly held I may proceed on the

original record in this Court reducing the need to file a complete appendix. (3D-24) This Court also kindly held, “Appellant need not conform to structure of a formal brief and may submit one principal brief not to exceed 45 pages.” (3D-67) I thank this Court for its generosity.

On October 20, 2022, I called my Third Circuit case manager because I discovered the Brief was due in less than a week. (3DI-94) She recommended I file for an extension of time to draft the brief. I filed a motion for an extension to draft the brief that same day. (3DI-95)

Admittedly, I believed the case was stayed pending the Delaware District Court’s determination on my latest motion to amend the orders of the District Court and alter the facts under Rule 60, and a Second Motion for a stay I incorporate herein by reference. (DI 95-96)

Early morning on Friday, October 21, 2022, I called my case manager because I was concerned about typos in the Motion for an extension to file. I rushed in an attempt to file before closing time on Thursday, October 20, 2022. She indicated I need not amend the Motion.

Due to the emergency situation, and my reliance on my case manager’s suggestion to file a motion to extend for time, I called back around 3:00 PM. (3DI-96) I was concerned about relying on the extension. I sought a confirmation that I may file after October 25, 2022. She asked how much time I required. I indicated I asked for 30 days or an amount of time the Court deems just in my motion. My case manager indicated I could get back to the Court on Monday, October 24, 2022. Monday is the due date.

To my horror, I looked at the PDF of my motion. My request in the amount of 30 days is missing. So, I filed a corrected motion to eliminate typos and to ask for a specific amount of days, 30 days I mistakenly thought I included, but must have only indicated in the system. I incorporate herein by reference my Motion and corrected motion, letter and exhibits thereto,

herein. (3DI 95-96). The PACER system indicates “until/for A time this court deems just and fair. I can ask for 30 days, but I am going to start working on it now, in hopes to file it asap.” ECF. [21-3198, 22-2079] (MMK) [Entered: 10/20/2022 05:04 PM]

I do not want to risk eliminating my right to access to the courts to prevent irreparable injury in the form of the Defendants infringement upon my free exercise of religious-political belief, exercise, speech and association. Nor do I desire to lose my property interest in my Delaware license to practice law. A lawyer’s right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state’s disagreement with my religious-political beliefs contained in speech in religious-political petitions. So, I write with haste. Rights imperfectly asserted under the duress of days to file, are better than waiving rights for failure to file.

I also preserve issues relating to the Third Circuit’s Orders and conduct, done to chill or punish my exercise of my right to petition in defense of my first amendment rights I preserve for appeal. I am concerned that my case manager may have misled me to my detriment to eliminate the case by encouraging me to file a motion for an extension of time only to deny it by failing to present it to the Clerk or the Court until the due date. On October 20, 2022, I pointed to the rule that allows 7 days to fix delinquencies in filing a brief to safeguard procedural due process by providing notice and opportunity to correct errors. See, 3d Cir. L.A.R. 107.2(b). I argue, 7 days is not enough to protect my meaningful opportunity to be heard and procedural due process rights under the 5th Amendment applicable to this Federal Court, under the facts of my case. My case manager indicated I could file a motion for additional time. I am not so sure the clerk would grant additional time in light of my last conversation. (3DI-96).

In my motion and corrected motion for an extension of time I indicate the importance of having people as opposed to automation to correct filing errors by the Court. I believe Court staff and judges will be reduced in number to be eliminated as schemed by participants in the World government summit and World economic forum by automation of standardized professions, including the practice of law. (3DI-95-96) I also pointed to other filing errors by other courts. Id. Errors are not the problem. Failure to correct them or retaliation against those who point them out or make them, is the problem. The Disciplinary case was brought in retaliation against me for asking the Court to correct government violations of my Constitutional right to freely exercise my religious-political beliefs, religious-political beliefs, speech, association, by exercising my right to petition to safeguard these rights from government infringement. On the record I point to retaliation by the courts, including yet not limited to the Delaware Supreme Court to correct its own or its agent or the government's agent as a problem. The retaliation discourages citizens, including me, from exercising their right to access to the courts to petition the courts to correct the Court's own errors or violations of law or errors by its arms or agents. This is one reason for this case. (DI. 2-4, 43, See, attached Dec 11, 2020 letter)

I also note, the Third Circuit Court chilled my meaningful access to the courts by discouraging me from contacting the Court more than once a day in an Order in retaliation for my motions to correct the Third Circuit's record to prevent irreparable prejudice against me. The Court also discouraged me from correcting motions, as other lawyers do in the common course of filing pleadings, especially in emergencies. The Third Circuit threatened me with sanctions which violate my religious beliefs in Jesus against debt. (3DI-90). During that time, my case manager was out on the civil rights case, and my case manager was out on the other case before the Third Circuit.

I note with prejudice that the Third Circuit's Order I sought reconsideration from is based on a false assumption, a misleading statement, that appears to be made in bad faith to cover up the Court's error that I filed an emergency motion when the record shows I mailed in the documents I sought to remove from the record. (3-DI 86-90). There is proof of postage. (3DI 87-10-11) I incorporate by reference my petitions to correct the filings, and related motions including but not limited to (3DI 87-88).

This is unacceptable. The courts are not above the Constitution. The Courts' goal is not to safeguard its mere appearance of justice by compromising actual justice which guarantees injustice. The Courts are not a business. Judges should not be concerned with their appearance or their self-serving desire to market their value or legitimacy, which eliminates impartiality by making the court's focus on fickle fads, and pleasing the mob, and doing what serves their seats instead of doing what is right, impartially under Constitutional law.

I desire to safeguard the integrity of the Courts by requiring they do not sacrifice people, and their individual exercise of their Constitutional rights, as the Defendants seek to sacrifice me for the exercise of my rights. I seek to preserve the integrity of the courts not destroy them. I do not seek to destroy this Court or the Delaware Chancery Court or the Delaware Supreme Court, but I do seek to hold them to the letter of the Constitutional law. If I am disparately treated in bad faith to fix the outcome or to throw out my case in various forums for the mere convenience of the court, or with malice and disdain towards me for my religious-political beliefs, speech, association or petitions, than others also may be unlawfully chilled by the Courts from exercising their right to access to the courts in defense of fundamental rights. (DI 2-4) Such precedent in my case creates a danger to the public to serve mere business greed, profit, power and position, not good by respecting all without disparate treatment based on income or belief. I object to

misleading statements noted on the Third Circuit's record made with intent to chill my exercise of the right to petition, even to petition to make corrections, in defense of my fundamental rights, or to prejudice my appeal. (3DI-77-90)

The Delaware Supreme Court placed my license on inactive, disabled on August 11, 2022, and denied my motion for rehearing on multiple issues.

The State proceeding has concluded. The District Court did not analyze any of the substance of my complaints or motions, and has abstained under Younger. So, this Court's review is limited as to whether Younger applies at this time, not the merits of my complaint and motions.

Younger does not require abstention to my case. There is no state case to abstain from. The state case has concluded. There is no bar. Even if there was a case: 1. Younger does not apply to my claims for damages. The Court erred by dismissing instead of staying the case 2. Younger does not apply to federal constitutional claims in the or ancillary claims I had no opportunity to assert on the state forum. For example, 42 U.S.C.A. §§§ 1983, 1985, 1988 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate 4. The Court erred in denying my motion to amend the complaint to include procedural and substantive due process violations, equal protections violations, and other conduct and claims that required I add the Delaware Supreme Court and the members to my complaint on January 24, 2022. (DI 43) I should be granted leave to amend the complaint, to correct any defects or arguments relating to a Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rights, and government punishment for the exercise of my rights, including the right to petition. 5. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of

discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession

I respectfully request this Court vacate the District-Order, and remand the case back to the Delaware District Court for review.

I. THE COURT ERRED IN RULING THAT THE YOUNGER ABSTENTION REQUIRED DISMISSAL, BUT REGARDLESS THE CASE IN DELAWARE IS OVER, YOUNGER DOES NOT BAR MY CASE FROM PROCEEDING

The District Court erred in ruling that the Younger abstention required dismissal. Regardless of the error, the issue is moot because the state disciplinary proceeding has concluded.

The District Court need not abstain under Younger since the Delaware Supreme Court's case is over. The District Court should stay the case, pending my intended appeal to the US Supreme Court.

The Third Circuit explained, "Younger abstention ... applies when certain types of state proceedings are ongoing at the time a federal case is commenced" *PDX N., Inc. v. Comm'r N.J. Dep't of Labor & Workforce Dev.*, 978 F.3d 871, 882 (3d Cir. 2020). The case before the Delaware Supreme Court is not ongoing. The Delaware Supreme Court made this clear by ordering "the Clerk of the Court is directed to refuse any further filings from Kelly in this matter." In re Kelly, No. 58, at *3 (Del. Sep. 7, 2022)

Younger does not apply. The state proceeding is over. This case may continue and I request the Third Circuit to please remand the case to the Delaware District Court. I note, the District Court made no analysis on the facts or law beyond denying my case under Younger. I

pray the District Court grants a stay until the conclusion of my appeal to the US Supreme Court. So, I can focus on the appeal which may prevent duplication of work, narrowing of the issues, and possible elimination of claims to prevent needless waste of resources for the parties and the Court.

II THE COURT ERRED IN APPLYING YOUNGER BECAUSE I ASKED FOR DAMAGES AND RELIEF UNAVAILABLE IN THE STATE FORUM. THE COURT SHOULD HAVE STAYED, NOT DISMISSED THE CASE

Th District Court erred as a matter of law by relying on the Younger abstention doctrine, and in dismissing my complaint and motions. The District Court based its decision on mistakes of fact. It would be an abuse of discretion, creating manifest injustice to dismiss my case.

This court's reliance on an abrogated case, *Middlesex* in its Orders is also misplaced. *Middlesex* merely related to procedural due process concerns relating to lapse of time, as distinguished from my case. *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, (1982); *Abrogation Recognized by Harmon v. Department of Finance*, 3rd Cir.(Del.), April 27, 2020; *Citing, Sprint Communications, Inc. v. Jacobs*, 571 U.S. 69,(2013), *Malhan v. Sec'y U.S. Dep't of State*, 938 F.3d 453, 462 (3d Cir. 2019).

In my case, I was denied a fair, impartial forum and a reasonable opportunity to be heard. The State's prosecution against me, as a party of one with individual-religious-political beliefs, for my exercise of genuinely held religious-beliefs, religious-political speech, religious-political-association, and the right to petition the courts when I believe there has been a grievance against me by a government agent, no matter my poverty, religious beliefs, or political orientation, violates my First Amendment rights and equal protections of the law.

The District-Court in its November 2, 2021 Memorandum, whether misleadingly or inadvertently, referred to Defendant's August 23, 2021 letter indicating my Chancery Court

religious-political pleadings in my active case as the reason Defendants brought the state proceeding. (DI 16, DI 3, District Court Exhibit 21) However, this court omitted the letter's reference to the Delaware Supreme Court pleadings as a reason. This omission is material to my argument the Delaware Supreme Court (hereinafter "Court" or collectively with Defendants in the case "State"), instigated the disciplinary proceeding against me. Therefore, the Court cannot present itself as impartial. (DI 9, Exhibit 5, DI 16-17). This Court also omitted my claim for damages in all of its orders, despite the fact I pointed to my claim for damages in pleadings. (DI 16-17, 30-31, 34-35, 59-60). I acknowledge the Court allegedly replaced the complaint at DI 2, as misfiled, with the page containing the claim for damages. I requested this be published to the public. The Court may have initially overlooked my claim for damages; however, I apprised the court of my claim for damages before I discovered the filing (DI 34-35, DI 61).

This Court also omitted my motions to amend the complaint to include additional counts, to include the Delaware Supreme Court justices in their personal capacity, and to include additional relief including declaratory, injunctive, damages and nominal relief. (DI 43, 58-60). Admittedly, I sought to withdraw my Motion to Amend the Complaint at DI 43, in order to motion the Court for permission to amend the complaint, after the appeal for the state proceeding is complete or the time for appeal lapsed, as new and additional evidence continuously arose, and will likely continue to arise during this time. (DI 69-75, 77, 80-82, 85).

This Court overlooked the fact I sought damages, not merely injunctive relief, in my original complaint, and other relief unavailable in the state courts. I sought relief, including but not limited, damages and equitable relief, under 42 USC §§§ 1983, 1985 and 1988, for, *inter alias*, court members' and the State's interference in my Religious Freedom Restoration Act lawsuit ("RFRA") against former President Donald J. Trump ("Kelly v Trump"). The Court

ignored my claims for infliction of emotional distress, defamation, loss of employment opportunity and lost wages. The Court also failed to consider my arguments concerning the loss of my right to exercise First Amendment Constitutionally protected liberties, including the exercise of my religious-political petitions, religious-political beliefs, religious-political association, religious-political exercise, and religious-political petitions, and loss of my property interest in my license to practice law. (DI 2-4, 34-35-2, 61-62) Nor did this Court look at the Defendants' interference with *Kelly v Trump* to entice me to forgo my case. This case relates to the harm caused by the Defendants in both the disciplinary proceeding and *Kelly v Trump*.

In *Deakins v. Monaghan*, the Supreme Court held only that “the District Court has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”¹ I made it clear to this Court, I pled defamation, Constitutional injury and

¹ Citing, *Deakins v. Monaghan*, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988) “Federal district court must stay rather than dismiss claims that are not cognizable in parallel state proceeding.” *Deakins v. Monaghan*, 484 U.S. 193, 202, 108 S. Ct. 523, 529–30, 98 L. Ed. 2d 529 (1988) “In reversing the District Court's dismissal of the claims for damages and attorney's fees, the Court of Appeals applied the Third Circuit rule that requires a District Court to stay rather than dismiss claims that are not cognizable in the parallel state proceeding.”); *See also*, *Brindley v. McCullen*, 61 F.3d 507 (6th Cir. 1995); *See also Quackenbush v. Allstate Ins. Co.*, 517 U.S. 706, 719 (1996) (“we have applied abstention principles to actions ‘at law’ only to permit a federal court to enter a stay order that postpones adjudication of the dispute, not to dismiss the federal suit altogether.”); *Lewis v. Beddingfield*, 20 F.3d 123, 124 (5th Cir. 1994). (It was proper to stay rather than dismiss the federal suit because the damages could not be claimed in the criminal prosecution.); *Jones v. Prescott*, 702 Fed. Appx. 205, 209 (5th Cir. 2017) (Younger abstention does not apply to federal suits seeking only money damages) (citing *Alexander v. Ieyoub*, 62 F.3d 709, 713 (5th Cir. 1993)); *See also, Boyd v. Farrin*, 575 Fed. Appx. 517 (5th Cir. 2014); **Third Circuit: *Abbott v. Mette***, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (A court “has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”); *Abbott v. Mette*, No. CV 20-131-RGA, 2021 WL 327375, at *3 (D. Del. Jan. 31, 2021), report and recommendation adopted, No. 20-CV-131-RGA, 2021 WL 1168958 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (“As a general matter, assuming that a federal court has jurisdiction over a case, the federal court's “obligation to hear and decide [the] case is virtually unflagging.” *Sprint Commc'ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013) (internal quotation marks and citation omitted); *Crane v. Fauver*,

emotional distress, by pleading damages, albeit unartfully in my original Complaint. (DI 2, 34-35). In addition, I showed my intent to seek nominal damages, damages, and equitable relief too. (D.I. 43, 58, 69-75, 77-79). My claims for damages were unavailable in state court.

A court “has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.” *Citing, Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), *aff’d*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec.

762 F.2d 325 (3d Cir. 1985) (“District court should have retained jurisdiction over correctional officers’ civil rights action arising out of their discharge, even if it properly declined to exercise jurisdiction over federal claims, and stayed action pending outcome of related state proceeding where officers were relegated for prudential reasons to state proceeding which could only afford them dismissal of charges and back pay, with attorney fees only to extent that back pay award was reduced by interim earnings, but officers sought constitutional damages and attorney fees, and new complaint upon termination of state proceedings may have been time-barred.”); *Williams v. Hepting*, 844 F.2d 138, 145 (3d Cir. 1988) (The Third Circuit held, “Accordingly, we hold that the district court should have stayed instead of dismissed without prejudice Williams’ failure-to-investigate and suggestive pretrial identification claims. Because these particular federal court claims for damages seek relief that is unavailable in Williams’ ongoing state proceedings, the allegations should be stayed pending the outcome of his state court appeal on the underlying conviction.”); *Nimer v. Lichfield Twp. Bd. of Trustees*, 707 F.3d 699 (6th Cir. 2013) (*Younger* abstention applies to § 1983 damages claims, but district court must stay rather than dismiss federal suit; in other words district court has no discretion to dismiss federal suit); *Carroll v. City of Mount Clemens*, 139 F.3d 1072 (6th Cir. 1998) (when federal suit seeks damages and *Younger* is invoked, federal suit should be stayed, not dismissed; this likely will be a formality, given probable preclusive effect of state court decision); *Watkins v. Ohio Dep’t of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022) (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021) (Court “stayed until the conclusion of the state disciplinary proceedings, rather than be dismissed.”), *citing, Kalniz*, 699 F. Supp. 2d at 975 (explaining that where a plaintiff is bringing constitutional civil rights claims in a federal court case in which *Younger* abstention was proper, the stay protects against the possibility that the statute of limitations could deprive the plaintiff of the opportunity to present the merits of her damages claims); see also *Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App’x 201, 206 (6th Cir. 2001) (and cases cited therein); *Yamaha Motor Corp. v. Stroud*, 179 F.3d 598 (8th Cir. 1999) (when damages are sought in § 1983 action subject to *Younger* abstention, and damages are not available in pending state proceeding, federal action should be stayed, not dismissed); *Night Clubs, Inc. v. City of Fort Smith*, 163 F.3d 475 (8th Cir. 1998) (when § 1983 complaint seeking damages is subject to *Younger* abstention, federal action should be stayed rather than dismissed).

14, 2021); *See, Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *1 (S.D. Ohio Mar. 7, 2022).

Abstention is not appropriate, staying the action was required. *See, Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022); (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”).

The Delaware District Court abused its discretion by dismissing as opposed to staying the proceeding and denying all motions as moot with its dismissal.

The Younger abstention does not apply to additional claims I included for money damages for First Amendment violations, loss of employment opportunity, emotional distress, and loss to reputation. (DI 2, 3, 4).

III. YOUNGER DOES NOT APPLY TO MY FEDERAL CONSTITUTIONAL CLAIMS OR ANCILLARY CLAIMS I HAD NO OPPORTUNITY TO RAISE IN THE STATE COURT

I had no adequate opportunity to raise my federal claims or ancillary claims for damages and nominal relief in state court. (DI 2 and DI 43). I asserted Constitutional defenses. Nevertheless, the state court precluded my meaningful opportunity to be heard on my defenses and motions, prevented discovery, denied me the opportunity to call witnesses, denied me access to the law library, sealed pleadings to conceal evidence, and fired two witnesses to prevent their testimony in my favor to prejudice the proceeding against me. (DI 55, 70-75, 77)

I moved the Court to amend the complaint to include the Delaware Supreme Court as a party, for additional relief, including but not limited to, additional equal protection violations, and additional procedural and due process claims. I also seek to void *Kelly v Trump* and the disciplinary matter. I also requested other equitable relief, and nominal damages. I also sought to amend the name of a Defendant, and other matters I include herein by reference to the docket item numbers.² (DI 43-44, 55-56, 58, 69-75, 81-82, 85).

The state court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction for its violations of procedural and substantive due process. Its judgments must be deemed void. (*See, May v. Anderson*, 345 U.S. 528, 537 (1953) “It is void ... if it denies due process of law.”); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments “ are void for lack of due process of law, or should be set aside for error.”). The state-court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction to rule on its own alleged violations of procedural and substantive due process, violations of First Amendment rights, conspiracy and collusion under 1985, or whether it had subject matter jurisdiction. Its judgments in *Kelly v Trump* and in the disciplinary cases may only be deemed void by the Federal District Court, not the state court.

² *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005) (The Third Circuit held, “A judgment may also be void if a court “acted in a manner inconsistent with due process of law.”); See Respondent’s Exhibits to the Hearing (“R-Ex”) Exhibits 35, 37 Part 2, 42, R 44

I had no adequate opportunity to raise my federal claims in state court. I asserted Constitutional defenses. Nevertheless, the state court precluded my meaningful opportunity to be heard on my defenses and motions, prevented discovery, denied me the opportunity to call witnesses, denied me access to the law library, sealed pleadings to conceal evidence, and fired two witnesses to prevent their testimony in my favor to prejudice the proceeding against me. (DI 55, 70-75, 77)

There was no opportunity to ask the Delaware Supreme Court to void its own decision in *Kelly v Trump* and the disciplinary matter or to seek equitable relief, money damages or nominal damages against itself and its agents and arms. I seek to sue the Delaware Supreme Court. They cannot decide the case against itself, because they are a defendant. The Delaware Supreme Court is partial to the state and itself. I am entitled to an impartial judge, in accordance with the 1st and 14th Amendment procedural and substantive Due Process protections.³

State procedural law barred presentation of my Constitutional claims.

I will face irreparable injury in terms of loss of First Amendment rights and my property interest in my license should this Court deny me of the opportunity to be heard.

A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any

³ US Const. Amend I, V. (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) ("Petitioner is entitled to a neutral and detached judge in the first instance."); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) ("excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error."Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party..."); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).

whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs, outlined in *Kelly v Trump*. The Defendants point to my religious beliefs and citations to the Bible in their petition at 7 which are relevant to my claims in *Kelly v Trump*, and my Religious Freedom Restoration Act, religious-political pleadings in their Aug. 23, 2021 letter, as the reason for the disciplinary proceeding against me. (DI 56, 56-1, 56-2)

In *Brindley v. McCullen*, 61 F.3d 507, 509, the Court held in a § 1983 action for damages, the Sixth Circuit ruled that when *Younger* abstention is invoked, stay rather than dismissal is the appropriate disposition. A stay "avoids the costs of refiling, allows the plaintiffs to retain their place on the court docket, and avoids placing plaintiffs in a sometimes-difficult position of refiling their case before the statute of limitations expires." *Id.* In my case the statute of limitations and costs given my poverty and religious beliefs against indebtedness, prejudice me by a dismissal under *Younger*. The statute of limitations also prejudices my case. I have claims relating to *Kelly v Trump*, and retaliation for my petitions for relief from bar dues, not merely claims for the Delaware Disciplinary case, which arose during that disciplinary proceeding which has concluded. I believe my claims relating to the petition for relief from bar dues were from January and February 2020, which approaches the statute of limitations in 3 or 4 months. In light of the multiple law suits and disciplinary proceedings which have arisen as a result of the disciplinary proceeding, dismissing my law suit under *Younger* would likely render me without relief for my bar dues petition which the Delaware Supreme Court appeared to address in its order, August 10, 2022, indicating the need for money over justice, making liberty for sale not free. Recall information contained in the bar dues petitions show the Delaware Supreme Court incited the disciplinary proceeding against me, though additional evidence of the court's collusion arose thereafter.

I still have claims for retaliation for my right to petition based on religious-political and poverty animus. I also have claims, including but not limited to 42 USC §§ 1983, 1985 and 1988 claims, as well as defamation, emotional distress, violations of my first amendment right of speech, belief, exercise of belief, association, speech and petition etc, relating to petitions other than the disciplinary petition. It places me in a difficult position should this case not be considered by the only court with subject matter jurisdiction to consider my claims, the Delaware District Court.

IV. BAD FAITH, HARASSMENT OR EXTRAORDINARY CIRCUMSTANCES HAVE ARISEN IN MY CASE THAT MAKE ABSTENTION INAPPROPRIATE

Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate.

The Record shows evidence of collusion and fraud to fix the proceeding against me, including but not limited to the sealing of records material to my defense to prejudice my case, the Board and Court denying my motions to perform discovery and to call witnesses to conceal the fact they eliminated two key witnesses by terminating them from the court, denial of my procedural due process rights, compelling me to attend a hearing when I was ill getting over the shingles. (DI 58) The record is full of additional outrageous issues including denial of access to the law library, granting me permission to hand in physical pleadings only to refuse to upload them onto the electronic record to conceal the ignored motions. (D.I.). The Board rendered email orders to prevent my opportunity to be heard on appeal. DI 47. The Hearing was inaccurately transcribed to prejudice me in this sham proceeding. (DI 47) Patricia Swartz lied to me about receipt of answer, which prejudiced me on costs an emotional distress. (DI 29). The record shows bad faith denials by Defendants and the State Court in response to my motions for a fair and impartial opportunity to be heard on issues other similarly situated attorneys would be

heard on. (DI 23, 34-36, 39-44, 47-58, 66, 69-75, 77-89, 95-96) There are other procedural defects that shock the conscience, but there is neither time nor space to discuss. The procedural history alone was 33 pages in my objections, I incorporate herein and do not waive due to space and time limitations. Irreparable injury exception to abstention applies, in § 1983 actions.

Circumstances give rise to irreparable injury sufficient to warrant exception to Younger abstention are extraordinary in the sense of creating an extraordinarily pressing need for immediate federal equitable relief, not merely in the sense of presenting a highly unusual factual situation. If I am being persecuted for believing differently, than other professionals who think differently than the state or its government backed private or foreign partners are in danger of being labeled the derogatory term disabled to demean their word before the public, while making it difficult to buy and sell as a professional.

The State Courts, the Chancery and Delaware Supreme Courts are without jurisdiction to grant relief beyond enjoining the state case since their members or agents incited the retaliatory behavior against me in bad faith to fix the sham proceeding against me to protect the mere appearance of the Courts while committing grave injustice that shocks the conscience. They cannot void their own decisions by the dictates of their desires instead of my appeal or by a lawsuit in federal court voiding their decision or holding they did not have subject matter due to procedural due process or equal protections violations. I am not aware of any cases which make orders voidable on equal protections grounds, but I reserve this argument for appeal too. It is prudent to protect individual liberty of minorities and others who do not think or believe the same as the majority or by the dictates of money. It makes us smarter to encourage diverse thought, and free not controlled to conformed dreaded dumbed down standardization.

The Delaware Supreme Court and Board (“Defendants”) clearly violated Equal Protections rights based on poverty-animus and political-religious animus, towards me as a party of one on disdain for my religious-political petitions, defending and safeguarding my religious-political beliefs, speech and association. beliefs, religious-political speech, religious-political association my substantive and procedural due process rights, and disparately treated me, by punishing me for my poverty, religious practice and religious speech pursuant to treatment that is not neutral or generally applicable. US Const Amend. I, IV. I argue the case is voidable not only for substantive and procedural due process violations including but not limited to denying me notice pursuant to the rules, an opportunity to be heard, meaningful opportunity to prepare and present my case before an impartial forum, an opportunity to call witnesses and to expect the Court before whom I present my case has not actively concealed evidence and witnesses to fix the proceeding against me, but also for the Court and the state’s and Defendants Equal protection violations brought with poverty animus, and political-religious animus. Nevertheless, this is not ripe for consideration until heard below. I fight now for the mere opportunity to be heard, the opportunity for justice, not the guarantee.

I do not have an adequate opportunity to raise my federal claims in state Court, including these claims. The state courts favor the Defendants, and favor their own agents. The Court cannot make a determination for relief against itself as a party.

V. THE COURT ABUSED ITS DISCRETION BY DENYING LEAVE TO AMEND THE COMPLAINT, WHILE APPLYING THE YOUNGER ABSTENTION

On January 24, 2022, I filed a Motion to amend the complaint showing I must join the Delaware Supreme Court and request for relief, I did not know was needed until that time, showing bad faith, fraud or collusion. The State Forum had no ability to hear my claims and additional claims fairly. (DI 43). The District-Court denied by failing to address it when it

rendered its order on April 26, 2022. The District Court sat on it for four months which is an abuse of discretion, an error by failing to consider material facts, amending the facts to include the additional facts, which causes manifest injustice against me, in terms of the loss of my fundamental rights, emotional distress, loss of property interests in my licenses to practice law and other harm. (DI 43)

The District Court appeared to fail to consider facts and legal arguments or exhibits contained in my motions to amend and alter the complaint. I incorporate herein in the entirety by reference, or other papers I filed I incorporate herein by reference, which are material to claims. (DI 2, 3, 4, 7, the exhibits therein, 20, 21, 21 29, 35, 36, 39, 40, 41, 43, 47, 48, 49, 51, 52, 53, 54, 55, 56, 57, 58)

Since April 24, 2022, the new and additional evidence has arisen showing the Court colluded in fixing the proceedings, including terminating two witnesses to conceal their testimony and preventing me from calling witnesses and performing discovery to find out the bad faith participation of the Delaware Supreme Court in concealing favorable testimony. Yet, the District-Court was aware of this when it rendered its order. (DI 58)

After April 24, 2022, new and additional information, facts and legal claims and damages have arisen which have not yet been considered. The District-Court must have opportunity to consider the facts and arguments to prevent manifest injustice. (DI 62, 64, 65, especially note the sealed docket items, that have since been unsealed, 66, 69, 70, 71, 72, 74, 75, 77, 78, 80-85, 88, 88, 89, 90, 91, 93, 95, 96).

I have since moved the court through rolling motions to amend the Complaint altogether once, at the conclusion of the appeal to the United States Supreme Court proceeding. Nevertheless, this is not yet ripe for review. The mere opportunity to be heard must be protected.

The Court has not issued an opinion on the facts of my case, or the additional facts after the order. I must be heard to prevent precedent that the Government is above the law, and there is no forum to be heard, and others will be punished like me for asking for relief from government incited substantial burdens upon my Constitutionally protected religious belief, religious exercise, religious speech, religious association and religious petitions concerning government incited grievances, and property interest in professional licenses. US Amends I, XIV

Leave to amend the complaint must be granted in the interest of justice since the District Court allowed the additional injuries to be had against my person in bad faith. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). If my motion to amend the complaint to include the Court had been permitted, the Court would not be permitted to find Younger abstained my case.

Because this District Court prevented service of the Complaint, I must be permitted fair opportunity to amend the Complaint after my appeal to the US Supreme Court to prevent manifest injustice against me, pursuant to Fed. R. Civ. P. 15 (a), and under other provisions of Fed. R. Civ. P. 15. I have a right to “amend without leave where no answer has been filed.” *Citing, De La Cruz-Saddul v. Wayne State University*, E.D.Mich.1980, 482 F.Supp. 1388.

The District Court allowed the additional injuries to be had against my person in bad faith. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)).

Because this District Court prevented service of the Complaint, I must be permitted fair opportunity to amend it after my appeal to the US Supreme Court to prevent manifest injustice against me, pursuant to Fed. R. Civ. P. 15 (a), and under other provisions of Fed. R. Civ. P. 15. I have a right to “amend without leave where no answer has been filed.” *Citing, De La Cruz-Saddul v. Wayne State University*, E.D.Mich.1980, 482 F.Supp. 1388 (Also see, *Adams v.*

Quattlebaum, D.D.C.2004, 219 F.R.D. 195 “Plaintiff enjoys absolute right to amend complaint once at any time prior to responsive pleading or granting of motion to dismiss.”)

“Leave to file an amended complaint is not required, since defendant had not yet answered,” and has not even been served yet. *Cunard Line Ltd. v. Abney*, S.D.N.Y.1982, 540 F.Supp. 657.

I think it prudent to serve an amended complaint as opposed to an original, and provide my intent to file an amended complaint at a later time, all at once at the conclusion of my appeal of the Delaware disciplinary matter to the US Supreme Court. (See, *Datastorm Technologies, Inc. v. Excalibur Communications, Inc.*, N.D.Cal.1995, 888 F.Supp. 112, “Complaint that has been amended pursuant to rule governing motions to amend suspends pleading it modifies, rendering original pleading void.”)

Defendants should reasonably expect, I would seek relief from this court for such irreparable injuries I suffer as a result of the Court failing to enjoin the disciplinary proceeding, and additional prospective relief to prevent new irreparable harm by amending my complaint to include the same. (DI 2-4, 7-10). I have no adequate opportunity to raise my federal claims in the state proceeding.

Defendants have notice, I will seek relief from this court for the irreparable harm I sought to prevent, including but not limited to, irreparable injury, as a loss to protections of my fundamental rights, harm towards my person, economic harm, by preventing me from seeking to rejoin my former law firm, my active license to practice law, my reputation, my health, the shingles, punishment for the exercise of my right to petition, in interference with my right to a fair trial in *Kelly v Trump*, interference with my right to a fair trial in the disciplinary matter which was unlawfully brought to punish me for the exercise of fundamental rights, my loss of and punishment

for the exercise of the right to a fair trial, to religious-political belief, religious-political association, religious-political speech, and the right to make religious-political petitions when I believe the government has committed a grievance against me, and procedural and substantive due process rights applicable to the Defendants pursuant to the 1st and 14th Amendments, Vindictive prosecution, selective prosecution and, or other claims.

On April 26, 2022, I filed a letter indicating my desire to amend the complaint again by stating. “With new and additional information commonly arising in my case, I have a running request to amend the complaint to conform with additional and new evidence, as they arise at the end of proceeding, to include additional or new claims or evidence.” (D.I. 58 at page 14)

On May 7, 2022, I filed *Plaintiff’s Addendum May 7, 2022, Critical documents unavailable to conceal court misconduct attached hereto to be included in DI-4; State Court sealing of documents in Kelly v Trump, correct and supplement the record at D.I. 4*, (“May 7th Motion”), wherein, I provided evidence the Delaware Supreme Court sealed my petitions, material to my defense in the disciplinary proceeding, without providing me notice or an opportunity to be heard to prejudice the case against me in the sham disciplinary proceeding. (D.I. 65, D.I. 65-2, D.I. 65-4).

I also alerted the court to my religious objection to swearing or affirming in the May 7th Motion. (D.I. 65, paragraphs 17-22.); (Also see, D.I. 77-2).

Since, it became clear my complaint, as filed, did not appear accurate to the public, I filed *Appellant Plaintiff Meghan Kelly’s Motion Directing the Delaware District Court to correct the Complaint to include the signature and listed damages for relief so as not to mislead the public, attorneys and appellate Courts*, to confirm my filing includes the claim for damages in the original complaint. (DI 61).

On May 24, 2022, I filed a more formal motion, *Plaintiff's Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Complaint.* (DI 69-75).

On June 7, 2022, I filed *Plaintiff's Motion to include pleadings filed on June 7, 2022, for the Court's consideration pursuant to her rolling motion to conform the complaint to additional facts alleged and arguments as they arise, as if already included in the complaint.* (D.I. 77)

There is a continuous need to amend the complaint, and I prefer to make a request leave be granted at the conclusion of my appeal to the US Supreme Court on the state disciplinary proceeding, as a matter of right, including appeals, or the time of appeal has lapsed. It appears additional facts, harm, and claims of relief will arise until the conclusion of the State proceeding, causing additional amendments to the complaint.

The Chancery Court revealed I cannot file for a mistrial, since the Court intentionally drafted a rule requiring, I violate my religious beliefs against swearing in order to prevent me from seeking a mistrial in *Kelly v Trump*, showing an unfair proceeding is guaranteed. (D.I. 77-2), See paragraph 36 above. This same rule prevents me from contesting the adjudication of disability by the Delaware Supreme Court before the Chancery Court. *Id.*

In the interest of justice, I must not be denied permission to file a motion to amend the complaint to include the Delaware Supreme Court in addition to each of the members as outlined in DI 43, as Defendants. I must petition this court to declare *Kelly v Trump* void, and seek to enjoin the justices and the courts from enforcing their decision, because of the Delaware Supreme court's participation in denying my procedural and substantive due process rights in violation of

the First Amendment to fix the outcome, not only in the disciplinary proceeding, but also in *Kelly v Trump*.⁴

A judgment may be void if a court "acted in a manner inconsistent with due process of law." *Constr. Drilling, Inc. v. Chusid*, 131 F. App'x 366, 372 (3d Cir. 2005); citing, 1 *Charles Alan Wright, Arthur R. Miller & Mary Kay Kane, Federal Practice and Procedure* § 2862.⁵ "While 60(b)(4) motions are ordinarily raised in the court that rendered the decision, they can be raised elsewhere." *Id.* Accordingly, I must be permitted the opportunity to plead to void *Kelly v Trump* based on absence of subject matter jurisdiction or voidable subject matter jurisdiction for the court's incitement and participation in prosecuting me for my religious beliefs and speech, contained in my petitions. In addition, I should not be denied the opportunity to request relief for the state's interference and attacks against me during my live religious-political RFRA case, *Kelly v Trump*, to cause me to forgo constitutional rights and to affect the outcome. *See, Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407 (2022) ("The Free Exercise and Free Speech Clauses of the First Amendment work in tandem: where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities.")

⁴ *Velasquez v. Litz*, No. CV 3:21-1659, 2021 WL 5298912, at *3 (M.D. Pa. Nov. 15, 2021); *See Fletcher-Harlee Corp. v. Pote Concrete Contractors, Inc.*, 482 F.3d 247, 253 (3d Cir. 2007); *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021); *Harris v. Raymond*, No. 3:20-CV-01119, 2020 WL 5267920, at *4 (M.D. Pa. Aug. 17, 2020), report and recommendation adopted, No. 3:20-CV-1119, 2020 WL 5260769 (M.D. Pa. Sept. 3, 2020)

⁵ *Bush v. Rauch*, 38 F.3d 842, 847 (6th Cir. 1994)(I argue the state's decisions are void, without jurisdiction exercised, outside of the scope of judicial function, in clear absence of all jurisdiction since the Delaware Supreme Court incited the state arms to attack me to fix the outcome in both *Kelly v Trump*, and the disciplinary matter.)

In *Lucero v. Ramirez*, No. 20-CV-2411-CAB-JLB, 2021 WL 1529932, at *1 (S.D. Cal. Apr. 16, 2021), the Court held, “An attorney charged with misconduct is entitled to receive reasonable notice, to conduct discovery, to have a reasonable opportunity to defend against the charge by the introduction of evidence, to be represented by counsel, and to examine and cross-examine witnesses.” I was denied these rights in the disciplinary proceeding too. The Delaware Supreme Court concealed the elimination of the witnesses, material pleadings, and colluded with the Defendants to obstruct my access to material witnesses in the disciplinary proceeding.

I have a “right to be tried by an unbiased and impartial judge without a direct personal interest in the outcome of the hearing [as prosecutor or witness].” *Ungar v. Sarafite*, 376 U.S. 575, 584, *Citing, Tumey v. Ohio*, 273 U.S. 510.

Per the US Supreme Court in *Peters v. Kiff*, 407 U.S. 493, 502 (1972), *Overruled in Gregg v. Georgia*, 428 U.S. 153, 169 (1976), on other grounds,

“[E]ven if there is no showing of actual bias in the tribunal, [the US Supreme Court] has held that due process is denied by circumstances that create the likelihood or the appearance of bias. This rule, too, was well established long before the right to jury trial was made applicable in state trials, and does not depend on it. Thus, it has been invoked in trials to a judge, e. g., *Tumey v. Ohio*, 273 U.S. 510 (1927); *In re Murchison*, 349 U.S. 133 (1955); *Mayberry v. Pennsylvania*, 400 U.S. 455 (1971)

The Delaware Supreme Court, would have correctly kicked the case out, in *Kelly v Trump*, for my failure to serve US Attorney General. They expressly did not. (DI 4, 79-3) Instead, the court stated my legal arguments against executive orders that permitted money be given to churches, under the deception of charity, to perform government business was lawful. In addition, the members of the Delaware Supreme Court incited the Supreme Court’s arms to attack me during proceeding, *Kelly v Trump*, to interfere with, and affect the outcome of my case.

I believe people go to hell for thinking business or money, convenience, avoidance of costs, or productivity is the law, making the law for sale, not protecting free people by elimination of

Constitutional freedoms of speech, belief, exercise of belief, association, and petition. It teaches that lawlessness, spoken of by Jesus, is the law, making money and material gain guide and God. Jesus teaches those who serve money as guide and God will not have eternal life, but will be cast in the fire. I believe courts have the ability to save eternal lives by taming the sin against the holy spirit, with just decrees, to prevent businesses from killing stealing and destroying for the bottom line.

The government ignores Constitutional liberties by enslaving its own people by making money the law. No government money should be granted to any private entity, regardless as to whether it is a not for profit, charity, another government, organization like CERN, business, or a religious institution. If the government funds it, it should run it, at no cost to the people, by coining money correctly, not through the federal reserve, and without debt and interest to care for the people. Otherwise, equal protections are violated and partiality is granted to entities who may perform government business at the least amount of cost, making those with more resources in a better position of gaining more government funding. This creates wealth, favoring those who are rich, while keeping the poor impoverished, not equal protections, but favoritism towards those with connections, power or material wealth.

VI. SOME NOT ALL OF NEW FACTS AND CLAIMS, WHICH MUST IN THE INTEREST OF JUSTICE BE REMANDED TO BE CONSIDERED BY THE DISTRICT COURT, ALONG WITH MY OTHER CLAIMS

The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession.

The hearings and actions taken by Defendants against my professional license in retaliation for my exercise of Constitutional rights are in violation of the First Amendment, the Procedural and Substantive Due Process Clause and Equal Protection Clauses of the Fourteenth Amendment. They must be rejected as by “rule of law” rather than personal vendetta for my personal-religious-political speech contained in the petitions. (US Amend I, XIV)

The State denied me of substantive and procedural due process rights in this disciplinary proceeding. The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, in retaliation against me for filing Kelly v Trump and for petitioning the court regarding bar dues to safeguard my liberties.

The state abused its discretion by 1. Vindictive prosecution, which constitutes a violation of due process, and by Selective prosecution, which constitutes a denial of equal protection.

The state courts are also without subject matter jurisdiction due to their conduct and interference with Kelly v Trump, to fix the outcome of that case and their participation in fixing the sham trial against me in the disciplinary action by violating my procedural and substantive due process rights rendering both the action voidable.

I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion by President Trump.

I uphold my oath by requesting government agents, judges, presidents and members of congress to adhere to rule of law by allowing me to exercise my Constitutional rights. The steps taken to orchestrate this proceeding circumvent due process protections and thereby manifest selective targeted unjust persecution.

The State Courts, the Chancery and Delaware Supreme Courts are without jurisdiction to grant relief since their members or agents incited the retaliatory behavior against me.

I did not have an adequate opportunity to raise my federal claims in state Court. The state courts favor the Defendants, and favor their own agents. The Court cannot make a determination for relief against itself as a party.

The Delaware Supreme Court and Board (also referred herein as “Defendants”) clearly violated Equal Protections rights based on poverty-animus and political-religious animus, towards me as a party of one on disdain for my religious-political petitions, defending and safeguarding my religious-political beliefs, speech and association. beliefs, religious-political speech, religious-political association my substantive and procedural due process rights, and disparately treated me, by punishing me for my poverty, religious practice and religious speech pursuant to treatment that is not neutral or generally applicable. US Const Amend. I, IV.

Nothing was normal during *Kelly v Trump*. Court staff appeared to seek to sabotage my case, based on my political-religious beliefs and/or indigency, by 1. misleading me to almost miss my deadline to appeal, 2. Appearing to disparage me based on religious-political beliefs or/and poverty, 3. instructing me to write off the Attorney General’s address, which impeded service, and 4. By writing on a praecipe, causing confusion, and needless pleadings.⁶

To worsen matters, the Delaware Supreme Court appeared to cause its arms to attack me to get me to forgo my lawsuit.⁷ DE-Lapp’s letter indicated the relief requested from the DE Supreme Court, relating to bar dues, as the source of its interference with my law suit. Id. (DI 77

⁶ (Objxn-B-D, K-internal-exhibits-2-7, 27-29, DI 62-72.

⁷ DI 62-72, Objxn-E-G, K-internal Ex-20-26-29.

Exhibit A, B, C) The Clerk of Court confirmed the entire court reviewed my petitions relating to attorney dues, evidencing the entire Court incited the interference in *Kelly v Trump*.

Further, Sussex Court of Common Pleas Judge Kenneth S. Clark, interrogated me at the arms of the court's request in public at BJ's, located in Millsboro. He demanded I come to his chambers for filing *Kelly v Trump* to obstruct, impede or cause me to forgo my lawsuit. *Id.*

Other parties are not threatened by Court agents wearing the cloak of government authority to obstruct, impede or cause claimants to forgo cases whose religious-political beliefs they disagree with. Minorities like myself, whose religious-political beliefs do not conform to the mainstream are still afforded Constitutional protections for exercise of fundamental rights relating to their diverse, tightly held religious-political beliefs, including speech defending such rights in petitions.⁸

I petitioned the Delaware Supreme Court concerning the disparate treatment. The Delaware supreme Court ruled my case was frivolous, and indicated my petitions relating to disparate treatment need not be addressed. The Court sealed these same petitions it indicated were not necessary to address to prejudice my case.

The Court's disagreement with my religious beliefs is an impermissible reason to deem me disabled. "Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case, [including mine] are reasonable." *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. The government may not determine what is and what is not an acceptable

⁸ *Obergefell v. Hodges*, 576 U.S. 644

religious belief.⁹ My God is the arbiter of my life, regarding religious beliefs, not the government, even when the government deems my religious beliefs wrong or a disability.

The Court's misguided conclusion that my case is frivolous is not a permissible reason to deem me disabled. Other lawyers have their cases and their clients' cases kicked out as frivolous and they are not disciplined or deemed a danger to society. My religious-political beliefs are the ODC's admitted reason for their claim for disability and for disciplining me. **(Exhibits E, F)**

On August 23, 2021, the ODC sent me a threatening letter by email, interfering with my active case, but for my petitions, before I appealed the Delaware Supreme Court's decision to the United States Supreme Court, admitting my Delaware Supreme Court and Chancery Court religious-political pleadings, as the reason for their attack.¹⁰ **(Exhibit E)**. The ODC's attack was "unconstitutional on its face and as applied." *Hill v. City of Scranton*, 411 F.3d 118, 122 (3d Cir. 2005). Should they have any legitimate concerns, which the record shows none, the ODC should not have interfered with my First Amendment exercise of petitioning the courts, to affect the outcome or pressure me to forgo the case, in violation of US Amend I and XIV. *Id.* at 125-126.

On October 25, 2021, I filed a lawsuit to enjoin the ODC for retaliating against me for exercising fundamental rights, and for damages for emotional relief.¹¹ On November 1, 2021 the US Supreme Court denied my writ of certiorari.¹²

⁹ *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). ("the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion.")

¹⁰ Objxn-K-Internal-Ex-5-7.

¹¹ Objxn-H

¹² Objn-K-Ex-1.

On or about November 4, 2021, the date the preliminary review committee conducted a hearing, the Delaware Supreme Court sealed my Delaware Supreme Court petitions in *Kelly v Trump* relating to disparate treatment, without notice and an opportunity for me, a party to be heard, and without valid cause.

I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State.¹³ Third Circuit Judge Bright's, concurring in part and dissenting in part in *U.S. v. Wecht*, 484 F.3d 194, 221, 226 (3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

In my case the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state.

"When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure." *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); See *United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

¹³ (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Constitution. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs.*, 800 F.2d 339, 343 (3d Cir. 1986).

In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, DI 16, 21, 40, 41, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

Nothing was normal in *Kelly v Trump*. The State and ODC attacked and retaliated against me for my religious-political speech contained in my petitions, reflecting my religious-political beliefs.¹⁴ The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point. ¹⁵

This is not the first time, the State through its arm has retaliated against me for its own lawless lusts, convenience, at the exchange of sacrificing Constitutional liberties, including the right to petition. Objxn-D, H, at paragraphs 277-299. I lost more than two million dollars in expected income, but for, the retaliation by the arms of the Court, for petitioning the State through its arms or the Court regarding concerns while taking the Delaware Bar. *Id.*

Nothing was normal in my disciplinary case either. I was not treated like other lawyers or other plaintiffs. I was disparately treated based on my poverty, and personal-religious-political beliefs, as a party of one, and was selectively punished for exercise of Constitutional liberties. ¹⁶

¹⁴ . Objxn-Ex B-H2, K

¹⁵ MOL Objxn-Ex-H, Objxn-Ex-N-internal-exhibits 1, 2to Exhibit 6, 3 to exhibit 6, 4 to exhibit 6, 5 to exhibit 6, 6 to exhibit 6, 8 to exhibit 6, Exhibit 7-9.

¹⁶ Objxn-K- 8-9, FF, GG, D.I. 55-56.

The State in bad faith prevented and obstructed discovery, to conceal witnesses were removed from the Chancery Court to impede their testimony from aiding in my defense, and to conceal relevant records were sealed by the Court to favor the ODC.¹⁷ The United States Supreme Court held, "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment." *Moran v. Burbine*, 475 U.S. 412, 466 (1986). Concealing the fact two witnesses were removed from the Chancery Court to prevent their favorable testimony in my defense, and government concealing of petitions favorable to my defense, violates my Due Process rights to a fair proceeding, by bias towards the State.

The Board's findings of fact are not supported by substantial evidence and should not be adopted. The record shows substantial evidence the Board was objectively biased towards the ODC, not fair, and prejudiced against me. The Board denied me of basic Equal protection, procedural and substantive due process rights afforded to similarly situated respondents based on disdain for my religious-political-exercise of fundamental rights and poverty. US Amend I and XIV. I was denied an opportunity to be heard, to prepare and present my case, denied adequate time to perform discovery, denied adequate notice which I at no time waived.¹⁸ The Board gave me 18 days, when the DLRDP Rule 9(d)(3) required, they provide me with notice "at least 20 days in advance of the hearing date," which prejudiced me. *Id.* The Board denied me of an opportunity to subpoena and cross examine witnesses with first-hand knowledge, to conceal the fact the State eliminated two potential witnesses from the court. *Id.*

¹⁷ *Brady v. Maryland*, 373 U.S. 83, 87 (1963); *United States v. Bagley*, 473 U.S. 667 (1985); *United States v. Agurs*, 427 U.S. 97 (1976); *Moore v. Illinois*, 408 U.S. 786 (1972)." *Moran v. Burbine*, 475 U.S. 412, 467 n.59 (1986)

¹⁸ Objxn, Ex-M-P-Q-R-R-1-S-T-U-U2-V-W-X-AA-BB-CC-DD-EE-FF-GG-HH, DI 55-56

The state rushed the proceeding and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters. *Id.*

I at no time sat on my rights, but fought for my life and liberty to worship God through the practice of law, and as a citizen without government persecution but for my exercise of fundamental rights. *Id.*

The state denied my 1st and 6th Amendment rights, applicable to the state via the 14th Amendment, to represent myself at the inception, causing me to file pleadings.¹⁹ The Board ignored, and did not address my motions objecting to insufficient notice, by its failure to provide at least 20 days-notice of the hearing, as required by the rules of Disciplinary procedure, Rule 9, which prejudiced my case, motivated by their animosity towards my religious-political beliefs and exercise. Objxn-Ex-M,N, W. I filed objections to the appointment of Counsel, moved for opportunity to perform discovery and postpone the hearing until fair reasonable due process was granted in a motion dated, December 18, 2022. That was ignored. Objxn-Ex-N-M-N-O-P. On December 29, 2021, I filed a letter with the Court requesting relief since the hearing was two weeks away, and I had not even been granted 6th Amendment permission to represent myself to perform discovery or prepare, at the time. Objxn-Ex-P.

It was not until December 30, 2022, the Court granted me the right to self-represent, less than 13 full days before the hearing, with no opportunity to prepare my defense of religious-political petitions, speech, association, beliefs against state persecution, but for my belief in Jesus. Ex-P-2.

¹⁹ Objxn-Ex-N. Mark 13:11 “Whenever you are arrested and brought to trial, do not prepare beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

I was so physically and emotionally exhausted that I fell ill with the shingles. After the reprieve, the small battle of self-representation won, I noticed my rash, pain, lethargy and weakness. Yet, I filed a motion the next day, that was ignored by the Board dated December 31, 2021, to prevent medical and mental examinations, dated December 31, 2021, Ex-Q, and another one dated on or about January 31, 2022, incorporated herein, Ex-X. Physical and mental examinations are against my religious beliefs, and the Court must not maliciously violate my religious beliefs in bad faith.

I followed up with the Board numerous times on the status of my motion to perform discovery, objection to insufficient notice, and postpone the hearing so as not to prejudice me, and at no time sat on my rights. Ex-K-L-M-N-O-P-Q-R-R-1,R-2-S-T-U-U2-V-W-X. I filed additional motions to postpone the hearing so as not to deny me a fair reasonable opportunity to prepare and present my case, perform discovery, cross examine witnesses. Id. I was denied basic due process rights, and substantive due process rights, based on my religious-political exercise of fundamental rights, in violation of the First and Fourteenth Amendment, motivated by the state's disdain towards my personal religious-political beliefs, exercise, speech and petitions demonstrating my faith in Jesus. Id.

I appealed to the Delaware Supreme Court and was denied procedural and substantive due process rights, based on the fact the Court appeared to render a verdict before granting me an opportunity to be heard, motivated by disdain to discriminate me based on my religious beliefs by disparate treatment, unusual to those of other claimants before the court. Ex-R, Ex-R-1, Ex-S, Ex-T, Ex-U, Ex-U-2, Ex-V.

The State ignored and denied me an opportunity to be heard on various motions and appeals, including but not limited to pleadings dated December 18, 2021, December 31, 2022,

January 13, 2022, January 15, 2022, objecting to due process violations, moving to postpone the hearing, to call witnesses, and objecting to the insufficient notice sent out notice 18 days prior to the scheduled hearing. Ex-P-Q-R-R-2-S-T-U-U-2-V-W. I had no time to subpoena witnesses, or even to discover the fact the state eliminated witnesses through terminating their employment in the Chancery Court, and I moved the Board and the Court to grant me time, specifically mentioning Arline Simmons as witness. I at no time waived my insufficient notice argument.

Defendant Kathleen Vavala (“Kathleen”), did not participate in the proceeding until after the hearing took place. Her recital of the DRPC rules to mislead the court is in vain. I was not afforded the protections of the rules, and at no times waived my Constitutional rights to a fair proceeding. The voluminous exhibits the Board ignored, deeming them as irrelevant, are relevant to show in fact the Board denied me an opportunity to be heard on the assertions and pleas contained therein, in defense of my exercise of fundamental rights. The exhibits show I did not sit on my rights or waive them.

Contrary to Kathleen’s assertion, having only been granted the right to represent myself 13 days before the hearing date, I was not afforded with ample time to provide a list of witnesses to call 10 days in advance of the hearing, as required under DLRDC (12)(h) as I faced other complications including but not limited to the lack of a phone, computer malfunctioning, the shingles, and vulture destruction of property. See D.I. 55-56. I did not even discover Arline Simmons, a witness I motioned to call, could not be served at the Chancery Court until after the hearing. Objxn-Ex-U. I had insufficient time to effectuate discovery, as I fought to represent myself so as not to violate my religious beliefs. The Board ignored and indirectly denied my requests for time for an opportunity, while rendering an informal, unappealable order in email form. Obxn-M-U2.

The hearing was postponed for 8 days, for a reason I did not assert, my illness, which did not afford me enough time to prepare, research, perform discovery, fully recover, or to subpoena witnesses to notice opposing counsel 10 days in advance. DLRDP (12)(h). Objxn-Ex-R-1. The Board ignored and rendered no orders on other motions, and rendered an E-mail determination, to obstruct formal appeal on January 18, 2022, in the fixed proceeding against me. Objxn-Ex-U-2.

I attempted to require the Board cancel the hearing, in advance, to prevent incurring costs as I was still not feeling well. I was so sick and exhausted and emailed the Board to cancel the hearing. I had no time to prepare, could not sleep, and truly felt sick, but was concerned the State may think I had the plague, Covid-19. Objxn-Ex-EE. I attended the hearing without being afforded an opportunity to prepare, and present my case, call witnesses, perform discovery or even to be human to care for my recovery because I did not want to be held in contempt. I made a special appearance preserving my objections to improper notice, lack of subject matter jurisdiction due to the Delaware Supreme Court's apparent participation in inciting the case, and to object on substantive and procedural Due process and Equal Protections grounds for the disparate treatment against me during the proceeding, and in inciting the proceeding. Objxn.-MOL.

The State knew I was exhausted, recovering from the shingles, lacking of sleep, without being afforded a fair opportunity to prepare and present my case. They did not care about me, or my personal health or my lack of a fair opportunity to present my case for my sake. They appeared to hope I would get sick to use it against me.

I attended the hearing by phone since I had no working computer. Objxn-Ex-GG, D.I. 55-56. Upon receipt of the transcript, I objected, and I object again as the transcript does not

accurately reflect my testimony. The reporter placed words that I did not say in my mouth. Objxn-Ex-AA, BB, CC. It appeared the state set me up. I filed corrections, which in no way make the transcript completely accurate. Id.

Kathleen, did not participate in this action until after the hearing. She relies on the inaccurate transcript I object to, and demeans me for my lack of a working computer and poverty, as evidence of disability. I am so poor I did not have a phone until sometime in January 2022. My computer did not work at the time of the hearing, and my backup computer also malfunctioned. My confusion as to why the computer was not working was absolutely genuine, and not evidence of a disability.

Kathleen's bad faith, or at best ignorant, attacks display her cold heartless indifference towards the substantial burden poverty has placed upon my defense of exercise of fundamental rights in this case.²⁰ "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations" *Lewis v. Casey*, 518 U.S. 343, 370 (1996) "Because this case implicates the [Constitutionally protected] right of access to the courts," and other fundamental rights, 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).²¹

The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred. Objxn-Ex-R2, V. The Delaware Supreme Court also indicated it made a determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a

²⁰ *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001)

²¹ *Lewis v. Casey*, 518 U.S. 343, 370 (1996); *Murray v. Giarratano*, 492 U.S. 1, 18 (1989)

case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. Objxn-Ex-V It is notable that both the Board and the court waited until two or three days prior to the hearing to address any matter while ignoring motions, leaving them unanswered.

I must be permitted to argue the Disciplinary proceeding be voided by the District Court. The Board and the Court both violated my substantive and procedural due process rights in the Board proceeding in bad faith, with objective partiality towards the government, and prejudice against me.

The Third Circuit held, "A judgment may also be void if a court "acted in a manner inconsistent with due process of law."²²

I must be permitted to argue the Delaware Supreme Court lacks subject matter jurisdiction or subject matter is voidable for apparently inciting the prosecution, and concealing beneficial evidence in bad faith to prejudice me with partiality to the government to fix the proceeding against me in violation of the Procedural and Substantive Due Process Clause pursuant to the State under the First and Fourteenth Amendments.

The record shows the Delaware Supreme Court through its agents participated in inciting the proceedings against me, acting as witness, prosecutor and judge, and by concealing evidence by 1. inciting the Court's arms to attack me in *Kelly v Trump*, and the present disciplinary proceeding, 2. collaborating with the Chancery Court and directing Delaware Supreme Court

²² *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005). See Respondent's Exhibits to the Hearing ("R-Ex") Exhibits 35, 37 Part 2, 42, R 44

employee Mrs. Robinson to sign off on the departure information of one or two of the former Chancery Court staff workers with information material to my state case, who appeared to lose their jobs, while preventing my opportunity to perform discovery or subpoena the two concealed witnesses, and 3, by eliminating some of the petitions for which the Defendants allege to bring the State action against me, placing them under seal, without notice to me a party, and without lawful reason, such as sensitive information relating to social security or bank accounts, to cover up the Court's and State's lawless acts, with knowledge these petitions are relevant to my defense and the federal proceeding.

Eliminating truth or evidence guarantees injustice. It is my religious belief courts exists to correct and guide those misguided by business greed, profit, position, and power, who sacrifice the lives, health and liberty of others for material gain, essentially selling souls to gain the world, only to lose their own eternal soul by the sin against the holy spirit, hardness of hearts from caring to think, to know, to love others unless it affects them.

Eliminating evidence hides the truth, or diverse views, allowing only the government-backed private partners' and public views to be protected under the Constitution.

The State seek to eliminate me, just as they cover up wrong doing by eliminating witnesses, forcing them to lose their jobs, under the deception of looking after them, only to look after the mere appearance of justice, not actual justice, and by concealing and sealing my pleadings. The Delaware Supreme Court justices do not care to uphold the fundamental rights of those in my class of one, of a person with unique religious-political beliefs which do not conform to the majority's, the individuals within the ODC and/or the judges on the Delaware Supreme Court.

Eliminating people who petition the Court, as “mentally disabled” for thinking the Court would care to help someone who is poor, or who believes in Jesus Christ or diverse political-religious views in that I seek to care for humanity not control them through money, is disparate treatment based on protected view point, in violation of the Equal Protections Clause applicable to the State pursuant to the First and Fourteenth Amendment. US Amend I, and XIV.

The Delaware Supreme Court incited the State’s petition, and concealed my religious-political petitions in bad faith with partiality towards the ODC. Joann and the Clerk of Court at the Delaware Supreme Court admitted that the Court sealed two motions, and Exhibits A-4, and A-5, in *Kelly v Trump*, relating to the Court and its agents’ disparate treatment towards me. None of the sealed documents contained sensitive information.²³ **(Exhibits F, G)** This was not for my protection or the protection of the parties, but was to cover up Court misconduct, just as the state seeks to eliminate me to conceal government misconduct by labeling me disabled, disparaging my reputation, to deem me not credible. ²⁴

The Delaware Supreme Court participated in eliminating potential material witnesses by having an agent sign off on the departure forms for two Chancery Court employees, Arline Simmons and Katrina Kruger. The Court colluded to conceal two people with first hand-knowledge of the facts of this case, despite my motion to subpoena one. ²⁵

I want the court to stop eliminating documents and witnesses, and do not want the court to eliminate the clerk who raised her voice at me on June 2, 2022, while confirming there was no

²³ DI 62-72

²⁴ . Objxn-K-Ex-31 See letters of recommendation on my behalf concerning my reputation.

²⁵ Objxn-Ex-T-U-U-2-V.

motion to seal petitions. The court staff who yelled at me in the Chancery Court are gone, no longer employed with the Court, and that breaks my heart.

Covering up mistakes by eliminating those who make them is not correction but concealment, allowing it to be ignored not lovingly corrected. The State seeks to eliminate me to conceal its own wrongs instead of learning from them.²⁶

The State's elimination of four sealed and concealed docket items and the elimination of two material witnesses from availability through process by service to the Chancery Court is relevant to my defense of retaliation, discriminatory motive, discriminatory purpose, with a discriminatory outcome made to chill my religious-political speech by demeaning my character as disabled, and threatening my bar licensure's status for exercising political-religious speech, contained in petitions, or outside the petitions, which the government disagrees with, based on religious-political viewpoint.

The Delaware Supreme Court lacks subject matter jurisdiction by its 1st and 14th Amendment substantive and procedural Due Process violations based on its prejudicial treatment in inciting the petition, and disparate treatment during the proceeding.

The Court disregarded my religious beliefs against appointment of counsel, requiring I file multiple pleadings to fight against government compelled violations against my religious beliefs. The Court disregarded my motion concerning the ODC's fraud, committed in bad faith by lying, seeking to commit fraud, concerning receipt of my answers. The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred. The Delaware Supreme Court also indicated it made a

²⁶ Objxn-MOL

determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. It is notable that both the Board and the court waited until two days prior to the hearing to address any matter while ignoring motions, leaving them unanswered. I must be permitted these claims as well as other claims before the Delaware District Court to prevent manifest injustice that shocks the conscience by the elimination of any forum to hear my claims, not defenses, for violations of my exercise of fundamental rights and other claims.

VII. CONCLUSION

This appeal to vacate the orders below and remand to the District Court must be granted. I must be afforded an opportunity to be heard upon the substance of my complaint, and motions to safeguard my fundamental rights and other injuries relating upon my exercise of Constitutional liberties, without disparate treatment based on religious-political animus, or poverty animus. US Amend I, V, XIV.

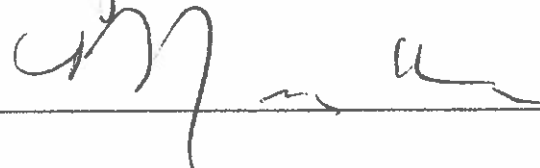
Dated: October 22, 2022

Respectfully submitted,
/s/Meghan Kelly
Meghan Kelly, Pro se
Not acting as an Attorney, Bar No. 4968 Inactive
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693

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

Dated: 10/22/22

Meghan Kelly (printed)

 (signed)

10/17/22, 9:55 AM

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**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:21-cv-01490-CFC**

Kelly v. Disciplinary Counsel Patricia B. Swartz et al
Assigned to: Judge Colm F. Connolly
Case in other court: Third Circuit, 21-03198
Third Circuit, 22-02079
Cause: 42:1983 Civil Rights Act

Date Filed: 10/25/2021
Date Terminated: 11/02/2021
Jury Demand: None
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

Plaintiff

Meghan Kelly

represented by **Meghan Kelly**
34012 Shawnee Drive
Dagsboro, DE 19939
PRO SE

Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
302-493-6693
Email: meghankellyesq@yahoo.com
TERMINATED: 08/11/2022
LEAD ATTORNEY

V.

Defendant

Disciplinary Counsel Patricia B. Swartz

Defendant

Disciplinary Counsel Kathleen M. Vavala

Defendant

**Chief Disciplinary Counsel David A.
White**

Defendant

Office of Disciplinary Counsel

Defendant

**Board of Professional Responsibility for
the Supreme Court of Delaware**

Defendant

**The Preliminary Investigatory
Committee**

ODC EXHIBIT 3

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Defendant

Kathleen Jennings

in her capacity as Delaware Attorney General

Date Filed	#	Docket Text
10/25/2021	<u>1</u>	MOTION for Leave to Proceed in forma pauperis - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Text of Proposed Order)(srs) (Entered: 10/25/2021)
10/25/2021	<u>2</u>	COMPLAINT filed Pro Se against Board of Professional Responsibility for the Supreme Court of Delaware, Chief Disciplinary Counsel David A. White, Disciplinary Counsel Kathleen M. Vavala, Disciplinary Counsel Patricia B. Swartz, Kathleen Jennings, Office of Disciplinary Counsel, The Preliminary Investigatory Committee - filed by Meghan Kelly. (Attachments: # <u>1</u> Verification, # <u>2</u> Text of Proposed Order, # <u>3</u> Civil Cover Sheet, # <u>4</u> Address Provided) (srs). (Main Document 2 replaced on 10/27/2021) (srs). (Entered: 10/25/2021)
10/25/2021	<u>3</u>	EXHIBITS to <u>2</u> Complaint (Pro Se), by Meghan Kelly. (Attachments: # <u>1</u> Exhibit 1-10, # <u>2</u> Exhibit 11-18, # <u>3</u> Exhibit 20-25)(srs) (Entered: 10/25/2021)
10/25/2021		NOTICE of filing the following Non-Paper material(s) in multi media format: CD of Exhibit 19 to <u>2</u> Complaint. Original Non-paper material(s) to be filed with the Clerk's Office. (srs) (Entered: 10/25/2021)
10/25/2021	<u>4</u>	EXHIBITS and APPENDICES filed into Delaware Supreme Court submitted as Exhibits to <u>2</u> Complaint (Pro Se)- filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit 1-10, # <u>2</u> Exhibit 10 (Additional), # <u>3</u> Exhibit 11-20, # <u>4</u> Exhibit 21-30, # <u>5</u> Exhibit 31-40, # <u>6</u> Exhibit 41-50, # <u>7</u> Exhibit 51-55, # <u>8</u> Exhibit 56-66, # <u>9</u> Appendix A-H) (srs). (Entered: 10/25/2021)
10/25/2021	<u>5</u>	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (srs) (Entered: 10/25/2021)
10/25/2021	<u>6</u>	MOTION to Expedite - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order) (srs) (Entered: 10/25/2021)
10/25/2021	<u>7</u>	MOTION for Temporary Restraining Order and Exemption of Bond - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit 1-10, # <u>2</u> Text of Proposed Order)(srs) (Entered: 10/26/2021)
10/25/2021	<u>8</u>	MEMORANDUM in Support re <u>7</u> MOTION for Temporary Restraining Order and Exemption from Bond - filed by Meghan Kelly. Answering Brief/Response due date per Local Rules is 11/8/2021. (srs) (Entered: 10/26/2021)
10/25/2021	<u>9</u>	MOTION for Preliminary Injunction and Exemption from Bond - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit 1-10, # <u>2</u> Text of Proposed Order)(srs) (Entered: 10/26/2021)
10/25/2021	<u>10</u>	MEMORANDUM in Support re <u>9</u> MOTION for Preliminary Injunction and Exemption from Bond - filed by Meghan Kelly. Answering Brief/Response due date per Local Rules is 11/8/2021. (srs) (Entered: 10/26/2021)
10/25/2021	<u>11</u>	MOTION for Permission to E-File, Exemption of Pacer Fees, and Waiver of the Additional Paper Copy Requirement - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order)(srs) (Entered: 10/26/2021)
10/25/2021	<u>12</u>	MOTION for Remote Proceedings or to Appear Remotely - filed by Meghan Kelly. (srs)

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		(Entered: 10/26/2021)
10/25/2021	<u>13</u>	PRAECIPE by Meghan Kelly requesting Clerk to issue Summons, Complaint, Exhibits, and related Motions on the Defendants. (srs) (Entered: 10/26/2021)
10/25/2021		Remark: Summons sent to case jacket. (srs) (Entered: 10/26/2021)
10/26/2021		MULTI MEDIA DOCUMENT filed by Meghan Kelly in the form of a USB Drive. Filing related to <u>1</u> , <u>2</u> , <u>3</u> , <u>4</u> , <u>6</u> , <u>7</u> , <u>8</u> , <u>9</u> , <u>10</u> , <u>11</u> , <u>12</u> , and <u>13</u> . (Media on file in Clerk's Office). (srs) (Entered: 10/26/2021)
10/27/2021		Case Assigned to Judge Colm F. Connolly. Please include the initials of the Judge (CFC) after the case number on all documents filed. (rjb) (Entered: 10/27/2021)
10/27/2021	<u>14</u>	Letter MOTION for Emergency Relief with regards to D.I. <u>7</u> MOTION for Temporary Restraining Order - filed by Meghan Kelly. (mal) (Entered: 10/27/2021)
10/28/2021	<u>15</u>	ORDER granting (D.I. <u>1</u>) Motion for Leave to Proceed in forma pauperis. Signed by Judge Colm F. Connolly on 10/28/2021. (twk) (Entered: 10/28/2021)
11/02/2021	<u>16</u>	MEMORANDUM. Signed by Judge Colm F. Connolly on 11/2/2021. (nmg) (Entered: 11/02/2021)
11/02/2021	<u>17</u>	ORDER, Plaintiff's motion to expedite is DENIED. (D.I. <u>6</u>). Plaintiff's motions for temporary restraining order, preliminary injunction, and exemption from bond, motion to e-file, and motion to appear remotely are DISMISSED as moot. (D.I. <u>7</u> , <u>9</u> , <u>11</u> , <u>12</u>). Plaintiff's letter/motion for emergency relief is DENIED. (D.I. <u>14</u>). The Court abstains under the Younger abstention doctrine and the Complaint is DISMISSED. The Clerk of Court is directed to CLOSE the case. (CASE CLOSED). Signed by Judge Colm F. Connolly on 11/2/2021. (nmg) (Entered: 11/02/2021)
11/03/2021	<u>18</u>	Letter to Honorable Chief Justice Colm F. Connolly from Meghan M. Kelly regarding Request for Emergency Relief. (twk) (Entered: 11/03/2021)
11/03/2021	<u>19</u>	Letter to Honorable Chief Justice Colm F. Connolly from Meghan M. Kelly regarding Requested Order. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3)(twk) (Entered: 11/03/2021)
11/08/2021	<u>20</u>	MOTION for Reargument re <u>17</u> Order - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibits)(mal) (Entered: 11/08/2021)
11/09/2021	<u>21</u>	MOTION to Amend Plaintiff's Motion for Reargument re <u>20</u> MOTION - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order, # <u>2</u> Exhibits, # <u>3</u> Certificate of Service) (myr) (Entered: 11/09/2021)
11/10/2021	<u>22</u>	CERTIFICATE OF SERVICE of D.I. <u>20</u> Motion for Reargument by Meghan Kelly (Attachments: # <u>1</u> Exhibit Postal Receipts, # <u>2</u> Text of Proposed Order)(apk) (Entered: 11/12/2021)
11/18/2021	<u>23</u>	MOTION to Amend Exhibit G to Complaint - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4, # <u>5</u> Text of Proposed Order, # <u>6</u> Certificate of Service)(apk) (Entered: 11/19/2021)
11/19/2021	<u>24</u>	Letter to Honorable Colm F. Connelly from Meghan Kelly regarding Plaintiff's Motion to Amend Exhibit G to complaint to add missing page - re <u>23</u> MOTION to Amend Exhibit G to Complaint. (srs) (Entered: 11/22/2021)
11/22/2021		Remark: two copies of DI <u>23</u> Motion received, placed in case jacket. (smg) (Entered: 11/22/2021)
11/24/2021	<u>25</u>	NOTICE OF APPEAL to the Third Circuit. Appeal filed by Meghan Kelly. (Attachments: 58 of 80

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		# <u>1</u> Proof of Mailing, # <u>2</u> Certificate of Service) (No Fee Paid, No IFP).(twk) (Entered: 11/24/2021)
11/30/2021	<u>26</u>	NOTICE of Docketing Record on Appeal from USCA for the Third Circuit re <u>25</u> Notice of Appeal to the Third Circuit filed by Meghan Kelly. USCA Case Number 21-3198. USCA Case Manager: Pamela Batts (DOCUMENT IS RESTRICTED AND CAN ONLY BE VIEWED BY COURT STAFF) (pb,) (Entered: 11/30/2021)
11/30/2021	<u>27</u>	ORDER of USCA Staying Case. Decision of USCA: Case Stayed. (pb,) (Entered: 11/30/2021)
12/06/2021	<u>28</u>	TRANSCRIPT REQUEST by Meghan Kelly TRANSCRIPT NOT NEEDED (Attachments: # <u>1</u> Cover Letter, # <u>2</u> Certificate of Service)(smg) (Entered: 12/07/2021)
12/06/2021	<u>29</u>	Letter to Chief Justice Colm F. Connolly from Meghan Kelly regarding new evidence to be considered. (Attachments: # <u>1</u> Exhibit- New evidence, # <u>2</u> Certificate of Service)(smg) (Entered: 12/07/2021)
12/22/2021	<u>30</u>	MEMORANDUM Signed by Judge Colm F. Connolly on 12/22/2021. (nmf) (Entered: 12/22/2021)
12/22/2021	<u>31</u>	ORDER denying <u>20</u> Motion for Reargument; granting <u>21</u> Motion to Amend the Motion for Reargument; denying as moot <u>23</u> Motion to Amend Exhibit G of the Complaint. Signed by Judge Colm F. Connolly on 12/22/2021. (nmf) (Entered: 12/22/2021)
01/03/2022	<u>32</u>	NOTICE OF APPEAL to the Third Circuit of <u>31</u> Order on Motion for Reargument, Order on Motion to Amend/Correct, <u>30</u> Memorandum and Order. Appeal filed by Meghan Kelly (No Fee Paid, No IFP). (TPO mailed). (nmg) (Entered: 01/03/2022)
01/11/2022	<u>33</u>	MOTION in Forma Pauperis Pursuant to 28 U.S.C. 1915(a) to waive PACER costs, and waive cost due to utter poverty, and due to foreseeable cost creating a substantial burden upon Plaintiff's access to the Courts and forced violation of her religious beliefs by threat of indebtedness. - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order, # <u>2</u> Certificate of Service, # <u>3</u> Certificate of Compliance)(mal) (Entered: 01/12/2022)
01/11/2022	<u>34</u>	MOTION to Amend Findings of Facts and Alter D.I. <u>31</u> Order - filed by Meghan Kelly. (Attachments: # <u>1</u> Certificate of Compliance, # <u>2</u> Certificate of Service, # <u>3</u> Text of Proposed Order)(apk) (Entered: 01/12/2022)
01/11/2022	<u>35</u>	EXHIBITS to D.I. <u>34</u> MOTION to Amend Findings of Facts and Alter D.I. <u>31</u> Order by Meghan Kelly. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit B2, # <u>4</u> Exhibit C, # <u>5</u> Exhibit D, # <u>6</u> Exhibit E, # <u>7</u> Exhibit F, # <u>8</u> Exhibit G, # <u>9</u> Exhibit H, # <u>10</u> Exhibit I, # <u>11</u> Exhibit J, # <u>12</u> Exhibit K)(apk) (Entered: 01/12/2022)
01/19/2022	<u>36</u>	EMERGENCY MOTION to Alter and Amend Judgment, D.I. <u>31</u> - filed by Meghan Kelly. (Attachments: # <u>1</u> Word Count, # <u>2</u> Exhibit A-F)(smg) (Entered: 01/19/2022)
01/19/2022	<u>37</u>	Emergency MOTION to Expedite Previous motion D.I. <u>36</u> - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order)(smg) (Entered: 01/19/2022)
01/19/2022	<u>38</u>	CERTIFICATE OF SERVICE for <u>36</u> MOTION to Alter Judgment, and <u>37</u> MOTION to Expedite by Meghan Kelly (smg) (Entered: 01/19/2022)
01/19/2022	<u>39</u>	MOTION to Amend Findings of Facts and Alter the Order, dated December 22, 2021, Based on New Findings of Fact, to Prevent, Clear Error of Facts, Clear Error of Law, and to Prevent Manifest Injustice - filed by Meghan Kelly. (Attachments: # <u>1</u> Table of Contents, # <u>2</u> Exhibit 1st A, # <u>3</u> Exhibit A, # <u>4</u> Exhibit B, # <u>5</u> Exhibit C, # <u>6</u> Exhibit D, # <u>7</u> Exhibit E, # <u>8</u> Exhibit F, # <u>9</u> Exhibit G, # <u>10</u> Certificate of Service, # <u>11</u> Word Count)(smg) (Entered: 01/19/2022)

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01/20/2022	<u>40</u>	Letter to Chief Justice Colm from Meghan Kelly regarding Emergency letter - re <u>36</u> MOTION to Alter Judgment, <u>39</u> MOTION to Alter Judgment, <u>38</u> Certificate of Service, <u>37</u> MOTION to Expedite, <u>34</u> MOTION to Amend Findings of Facts and Alter D.I. <u>31</u> Order, <u>35</u> Exhibit to a Document. (Attachments: # <u>1</u> Exhibit two emails cancel hearing, # <u>2</u> Certificate of Service)(Kelly, Meghan) (Entered: 01/20/2022)
01/21/2022	<u>41</u>	Third Emergency MOTION to Alter and Amend Judgement re (DI <u>31</u>) Order on Motion for Reargument, Order on Motion to Amend/Correct, - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Certificate of Compliance, # <u>8</u> Certificate of Service, # <u>9</u> Text of Proposed Order)(twk) (Entered: 01/21/2022)
01/21/2022	<u>42</u>	Emergency MOTION to Review Motion re (DI <u>36</u>) MOTION to Alter Judgment - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order)(twk) (Entered: 01/21/2022)
01/24/2022	<u>43</u>	First AMENDED COMPLAINT by Plaintiff Meghan M. Kelly against All Defendants - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Email showing intent to cross examine judge, dated Oct. 25, 2021, # <u>2</u> Exhibit Blackline of changes to complaint, # <u>3</u> Exhibit Amended Complaint without signature page, # <u>4</u> Exhibit Amended Complaint Signature and declaration pages, # <u>5</u> Certificate of Compliance Certificate of Word Count, # <u>6</u> Certificate of Service of the motion to Amend Complaint and the amended Coomplaint, # <u>7</u> Text of Proposed Order Proposed Order)(Kelly, Meghan) (Entered: 01/24/2022)
01/25/2022	<u>44</u>	Letter to Chief Justice Colm from Meghan Kelly regarding Second copy of motion to Amend Complaint sent to Defendant - re <u>43</u> Amended Complaint, <u>7</u> MOTION for Temporary Restraining Order, <u>8</u> MEMORANDUM in Support. (Attachments: # <u>1</u> Certificate of Service Cert of service of letter and second copy of pleadings, # <u>2</u> Exhibit postal receipt)(Kelly, Meghan) (Entered: 01/25/2022)
02/05/2022	<u>45</u>	TRANSCRIPT REQUEST by Plaintiff Meghan M. Kelly by Meghan Kelly for proceedings held on Not applicable/form is required to show it is not required before Judge Chief Justice Colm. (Attachments: # <u>1</u> Certificate of Service of Transcript not required, the signature of the Clerk appears to be required)(Kelly, Meghan) (Entered: 02/05/2022)
02/07/2022	<u>46</u>	TRANSCRIPT REQUEST by Meghan Kelly TRANSCRIPT NOT NEEDED. (twk) (Entered: 02/08/2022)
02/14/2022	<u>47</u>	Second MOTION for Preliminary Injunction by Plaintiff Meghan M. Kelly - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Exhibit A, Jan 18, 2022 request for an order in an appealable form, instead of an order in form evading opportunity for review, # <u>2</u> Exhibit Exhibit B, Jan. 11, 2022 request for a copy of the docket, the record to the person acting as clerk or administrator to the Board. My request was ignored, # <u>3</u> Exhibit Exhibit C, Jan. 31, 2022, Email to the Board and Patricia Swartz requesting she please send the state's exhibits Patricia and the Board required due Jan. 31, overruling my objection to refer to the record, # <u>4</u> Exhibit Exhibit D, Jan 31, 2022, email requesting Exhibit names, and forwarded E-mail espousing facts and religious beliefs, # <u>5</u> Exhibit Exhibit E, Jan.31, 2022 email asking for exhibits in attachment form with names, # <u>6</u> Exhibit Exhibit F, Jan. 25, 2022, Respondent's Motion for Dismiss for lack of notice in the state forum, # <u>7</u> Exhibit Exhibit G, Jan. 31, 2022, RESPONDENTS MEGHAN KELLYS MOTION FOR A PROTECTIVE ORDER PREVENTING MENTAL EXAMINATION OF RESPONDENT AS A GOVERNMENT COMPELLED VIOLATIONS OF HER RELIGIOUS BELIEF IN JESUS CHRIST, # <u>8</u> Exhibit Exhibit H, Email concerning immediately noticed errors in transcript emailed to me on Jan 31, 2022, # <u>9</u> Exhibit Exhibit I, Email to Board and Patricia regarding serious errors of court reporter, space for faith, I got cancer for I got the answer, and other errors, # <u>10</u> Exhibit Exhibit J, Email to Board and Patricia regarding court reporting errors regarding hegemonic state, Not head demonic state, # <u>11</u> Exhibit Exhibit K, my filed corrections of the transcript via Letter and attachment of corrections,

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		with reserve to file additional corrections, # <u>12</u> Exhibit Exhibit L, Resubmitted second petition to the Delaware Supreme Court regarding license filing dues, dated Feb 5, 2021, resubmitted Feb. 1, 2022, # <u>13</u> Exhibit Exhibit M, Feb. 1, 2022, Third request relating to attorney dues, # <u>14</u> Exhibit Exhibit N, order granting third request relating to lawyer dues, # <u>15</u> Text of Proposed Order Proposed order on Plaintiffs Motion for an urgent emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate irreparable injury compelled violations of my religious beliefs, but for my exercise of religious beliefs, # <u>16</u> Certificate of Service Certificate of service of Plaintiffs Motion for an urgent emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate irreparable injury compelled violations of my religious beliefs, but for my exercise of religious beliefs, Plaintiff's Memorandum of Law in Support of her Motion, and Motion to Expedite)(Kelly, Meghan) (Entered: 02/14/2022)
02/14/2022	<u>48</u>	Emergency MOTION to Expedite by Plaintiff Meghan M. Kelly - filed by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order Proposed Order on Motion to Expedite, # <u>2</u> Certificate of Service Certificate of Service on Motion to Expedite, PLAINTIFFS MOTION FOR AN URGENT EMERGENCY PRELIMINARY RESTRAINING ORDER TO BE APPLIED IMMEDIATELY, WITH A WAIVER OF BOND, TO PREVENT IMMEDIATE AND IRREPARABLE INJURY BY COMPELLED VIOLATIONS OF MY RELIGIOUS BELIEFS, BUT FOR MY EXERCISE OF RELIGIOUS BELIEFS, and Plaintiff's Memorandum of Law in Support of her Motions)(Kelly, Meghan) (Entered: 02/14/2022)
02/14/2022	<u>49</u>	PRETRIAL MEMORANDUM by Meghan Kelly. (Attachments: # <u>1</u> Text of Proposed Order proposed Order on Plaintiff's Motion for an urgent emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate irreparable injury compelled violations of my religious beliefs, but for my exercise of religious beliefs Memorandum of Law in Support of Plaintiffs, # <u>2</u> Certificate of Service Certificate of Service on Motion to Expedite, Plaintiff's Motion for an urgent emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate irreparable injury compelled violations of my religious beliefs, but for my exercise of religious beliefs, and Plaintiff's Memorandum of Law in Support of her Motions)(Kelly, Meghan) (Entered: 02/14/2022)
02/23/2022	<u>50</u>	Letter to Chief Justice Colm from Meghan Kelly regarding Patricia Swartz taken off case. (Attachments: # <u>1</u> Certificate of Service Letter Patricia Swartz in professional capacity only/I think she is retiring)(Kelly, Meghan) (Entered: 02/23/2022)
03/10/2022	<u>51</u>	Letter to Chief Justice Colm from Meghan Kelly regarding Status update and status on Emergency Preliminary injunction filed March 15, 2022 - re <u>49</u> Pretrial Memorandum,,, <u>48</u> Emergency MOTION to Expedite by Plaintiff Meghan M. Kelly. (Attachments: # <u>1</u> Exhibit Exhibit A Board questioning loyalty to the law, country and Constitution because I sued President Trump regarding Constitutional violations, # <u>2</u> Exhibit Exhibit B Order by DE Sup Ct inidcating they deny opportunity to be heard until after it is too late, # <u>3</u> Exhibit Exhibit C Order by DE Sup Ct making a decision on my defenses before allowing me to present a defense, # <u>4</u> Exhibit Exhibit D Board's non-appealable email decision dated Jan. 10 on motion dated Dec 18., # <u>5</u> Exhibit Exhibit E Board's non-appealable decision, # <u>6</u> Certificate of Service Cert of Service of March 10, 2022 letter with exhibits)(Kelly, Meghan) (Entered: 03/10/2022)
03/29/2022	<u>52</u>	Letter Letter to Chief Justice Colm from Meghan Kelly regarding Waiving Pacer Fees, The Third Circuit granted me a waiver and directed me to contact you, to follow up on my two motions to waive fees, including Pacer fees - re <u>33</u> MOTION, <u>1</u> MOTION for Leave to Proceed in forma pauperis, <u>11</u> MOTION Permission to E-File, Exemption o Pacer Fees, and A waver of the Additional Paper Copy Requirement. (Attachments: # <u>1</u> Exhibit Order by the Third Circuit granting Pacer exemption, directing me to contact the Delaware

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		District Court for an exemption of pacer costs with the District Court, # 2 Certificate of Service Certificate of Service of Status update letter on waiving Pacer fees and other costs, but Pacer fees is more pressing)(Kelly, Meghan) (Entered: 03/29/2022)
03/29/2022	<u>53</u>	Letter Letter to Chief Justice Colm from Meghan Kelly regarding Feb 14, 2022 Motion for TRO, Preliminary Injunction and Emergency Motion, Meg is in immediate danger of loss of additional Constitutional liberties now, please help me - re <u>49</u> Pretrial Memorandum,,, <u>47</u> Second MOTION for Preliminary Injunction by Plaintiff Meghan M. Kelly, <u>48</u> Emergency MOTION to Expedite by Plaintiff Meghan M. Kelly, <u>51</u> Letter,,, (Attachments: # <u>1</u> Exhibit Exhibit A table of contents of exhibits not docketed electronically, # <u>2</u> Exhibit Exhibit B showing 30 pages of procedural history in the state proceeding, # <u>3</u> Exhibit Exhibit C emails to clerk and opposing counsel Kathleen Vavala in state court, # <u>4</u> Certificate of Service Cert of service via email and US mail)(Kelly, Meghan) (Entered: 03/30/2022)
04/04/2022	<u>54</u>	Second MOTION exemption from in person appearances, permission to appear remotely re <u>33</u> MOTION, <u>1</u> MOTION for Leave to Proceed in forma pauperis, <u>12</u> MOTION for Remote Proceedings for reasons not mentioned in the first motion - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Exhibit A Plaintiff's motion for remote proceedings or to appear remotely, dated Oct 21, 2022, relating to prevention of sickness and death in a global pandemic, # <u>2</u> Exhibit Exhibit B evidence I have been thinking of turning in my car tags because of unaffordable expense, # <u>3</u> Exhibit Exhibit C Excerpts of the 4th Ind Rev to show making it too expensive to drive is part of the goal to intentionally crash the economy to replace the fiat dollar to something that tracks and places humanity on a debt system down the line, # <u>4</u> Exhibit Exhibit D Covid 19 The Great Reset excerpts, # <u>5</u> Exhibit Exhibit E photos, # <u>6</u> Exhibit Exhibit F Excerpts from the world economic forum founder's latest book released in 2022, showing the 91 banks who scheme to control governments no longer free to govern independently with lawless reign unrestrained by their desire for profit on debt interest and debt control rewarding killing, stealing and destroying to serve its entities existence, # <u>7</u> Text of Proposed Order Proposed Order on Plaintiffs different motion for exemption to appear in person in Court, for remote proceedings, or to appear remotely due to foreseeable costs relating to transportation creating a substantial burden upon my access to the Courts and forced violation of my religious beliefs by threat of indebtedness, dated April 4, 2022, # <u>8</u> Certificate of Service Cert of Serv of Plaintiffs different motion for exemption to appear in person in Court, for remote proceedings, or to appear remotely due to foreseeable costs relating to transportation creating a substantial burden upon my access to the Courts and forced violation of my religious beliefs by threat of indebtedness, dated April 4, 2022)(Kelly, Meghan) (Entered: 04/04/2022)
04/13/2022	<u>55</u>	Letter to Chief Justice Colm F. Connelly from Meghan Kelly regarding Exhibits allegedly will be uploaded - re <u>53</u> Letter,,, (Attachments: # <u>1</u> Exhibit Exhibit A, Court changing its mind indicating physically filed exhibits would not be uploaded, # <u>2</u> Exhibit Exhibit B, procedural history in the state proceeding, # <u>3</u> Exhibit Exhibit C, email on opposing counsel's position should I file a motion to compel the court to include electronic versions of exhibits, # <u>4</u> Exhibit Exhibit D court changed its position, # <u>5</u> Exhibit Exhibit E, rejection at DelTech, # <u>6</u> Exhibit Exhibit F, disparate treatment at Del Tech, # <u>7</u> Exhibit Exhibit G, proof scanned in exhibits and emailed them to the court for ease to upload, # <u>8</u> Exhibit Exhibit H, request for bar card, # <u>9</u> Exhibit Exhibit I, Library card and bar card, # <u>10</u> Exhibit Exhibit J Report From Iron Mountain, on the possibility & Desirability of Peace, allegedly by Leonard C. Lewin, # <u>11</u> Exhibit Exhibit K The Creature From Jekyll Island, # <u>12</u> Exhibit Exhibit L Klaus Schwab, Thierry Malleret - The Great Narrative (The Great Reset Book 2), # <u>13</u> Certificate of Service Cert of service by mail)(Kelly, Meghan) (Entered: 04/13/2022)

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04/21/2022	<p><u>56</u> Letter to Chief Justice Colm F. Connelly from Meghan Kelly regarding Religious beliefs of activity leading to hell, injustice. (Attachments: # <u>1</u> Exhibit Exhibit A petition based on biblical political beliefs an impermissible purpose to persecute and punish, # <u>2</u> Exhibit Exhibit B August 23 ODC letter bringing suit based on supreme court and chancery court religious political petitions, # <u>3</u> Exhibit Exhibit C DE-Lapp interfering, and threatening letter based on separate petition lawyer fees, # <u>4</u> Exhibit Exhibit D Meg pointing out lawyer bad behavior uncorrectable because professional Board's look after businesses, the professions, not the customers, # <u>5</u> Exhibit Exhibit E email to the federal judiciary committee how to prevent the planned crash, # <u>6</u> Exhibit Exhibit F Greenpass developed before pandemic, the pandemic manufactured for the need to implement the wicked economy which eliminates freedom for control, order and equality, equality is not freedom free choice not forced choice is, # <u>7</u> Exhibit Exhibit G Clearpass pass ports alluded to in books by founder developed for manufactured use prepandemic, # <u>8</u> Exhibit Exhibit H entity information on Clearpass, # <u>9</u> Exhibit Exhibit I October 19 2020 letter referencing planned economic crash to Chancery Ct, # <u>10</u> Exhibit Exhibit J July 21, 2021 Letter to DE Sup Ct with the two books I gave you regarding the economic crash, noting I gave the same to Police Chief Officer Flood in Dagsboro, # <u>11</u> Exhibit Exhibit K an example Bible verses may be used as authority accepted by US Supreme ct, # <u>12</u> Exhibit Exhibit L apprising Patricia religious beliefs against false charity and the global schemed crash, # <u>13</u> Exhibit Cert of Service)(Kelly, Meghan) (Entered: 04/21/2022)</p>
04/21/2022	<p><u>57</u> Letter to Chief Justice Colm F. Connelly from Meghan Kelly regarding Postal Receipt Email receipt - re <u>56</u> Letter,,,,,. (Attachments: # <u>1</u> Certificate of Service Email with April 21, 2022 letter and attachments sent to opposing counsel, # <u>2</u> Certificate of Service Part 2 Email with April 21, 2022 letter and exhibits sent to opposing counsel)(Kelly, Meghan) (Entered: 04/21/2022)</p>
04/26/2022	<p><u>58</u> Letter to Chief Justice Colm F. Connelly from Meghan Kelly regarding Running motion to allow complaint to be amended to reflect the facts, witnesses eliminated by state, concealed the fact they retired during proceeding, did not allow me to gather discovery from them to hide this fact. (Attachments: # <u>1</u> Exhibit Table of Contents of Exhibits and electronic data, # <u>2</u> Exhibit Exhibit A doctored up praecipe Oct 5 2020 I did not know she wrote on it, # <u>3</u> Exhibit Exhibit B ltr to DE Supreme Court, July 12, 2021 regarding staff told me to cross off, # <u>4</u> Exhibit Exhibit C Praecipe with address crossed off, # <u>5</u> Exhibit Exhibit D Praecipe with switched address sheets, # <u>6</u> Exhibit Exhibit E Letter to Master Patricia Griffin regarding I am not an attorney advocate in the case, # <u>7</u> Exhibit Exhibit F Letter to Assigned Vice Chancellor, # <u>8</u> Exhibit Exhibit G Ltr October 30, 2020, regarding removal, immunity remove, # <u>9</u> Exhibit Exhibit H Letters to Courts requesting waiver of notary requirements, President Trump has covid 19, # <u>10</u> Exhibit exhibit I Letter from the Court notary requirements, # <u>11</u> Exhibit Exhibit J Letter to Master regarding disparatc treatment by court based on religion, political association and poverty, # <u>12</u> Exhibit Exhibit K Letter to Master regarding Chancery Court staff misled me to almost miss the appeal deadline., # <u>13</u> Exhibit Exhibit L Email to David Weiss and opposing counsel regarding Dr. Bunting, Judge Smalls potentially relating to my pe, # <u>14</u> Exhibit Exhibit M Email to opponents, with page 39 of the Fourth Industrial Revolution, relating to the elimination of lawy, # <u>15</u> Exhibit Exhibit N My pleading before arbitrator, Defendant David White, # <u>16</u> Exhibit Exhibit O ODC letters and Complaint Justice Kavanaugh, # <u>17</u> Certificate of Service To Court and Defendants electronic data too, # <u>18</u> Certificate of Service Post Office Receipt, # <u>19</u> Certificate of Service Email part 1 to Defendants through opposing counsel, # <u>20</u> Certificate of Service Email part 2 to Defendants through opposing counsel, # <u>21</u> Certificate of Service Email part 3 to Defendants through opposing counsel)(Kelly, Meghan) (Entered: 04/26/2022)</p>
04/26/2022	<p><u>59</u> MEMORANDUM OPINION. Signed by Judge Colm F. Connolly on 04/26/2022. (apk) (Entered: 04/26/2022)</p>

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04/26/2022	<u>60</u>	ORDER, Plaintiff's pending motions (D.I. <u>33</u> , <u>34</u> , <u>36</u> , <u>37</u> , <u>39</u> , <u>41</u> , <u>42</u> , <u>47</u> , <u>48</u> , <u>54</u>) are DENIED. Signed by Judge Colm F. Connolly on 04/26/2022. (apk) (Entered: 04/26/2022)
04/27/2022		NOTICE of filing the following Non-Paper material(s) in multi media format: Videos and Images referenced in D.I. <u>58</u> on a thumb drive. Original Non-paper material(s) to be filed with the Clerk's Office. Notice filed by Meghan M. Kelly. (nmg) (Entered: 04/27/2022)
05/03/2022	<u>61</u>	MOTION for Publication of <i>Corrected Original Complaint</i> - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Original filed Signature and verification page, # <u>2</u> Exhibit Original filed complaint, # <u>3</u> Verification Declaration to the motion, # <u>4</u> Text of Proposed Order Proposed Order, # <u>5</u> Certificate of Service Certifate of Service, # <u>6</u> Certificate of Service Email receipt)(Kelly, Meghan) (Entered: 05/03/2022)
05/03/2022	<u>62</u>	MOTION for Leave to Proceed in forma pauperis <i>Discrepancy in docs request one copy before access to PACER granted</i> - filed by Meghan Kelly. (Attachments: # <u>1</u> Verification Declaration, # <u>2</u> Exhibit Pages Defendant gave me, # <u>3</u> Exhibit Two pages available to the public that require updating, # <u>4</u> Text of Proposed Order Proposed order on Appellant Plaintiff Meghan Kellys Motion, without waiving her prior Motions for exemptions for costs, to access to a free copy of all filed copies, without the 14 day limit for all documents relating to this case from October 25, 2021, to on or about January 20, 2022 on PACER, # <u>5</u> Certificate of Service Cert of serv of Appellant Plaintiff Meghan Kellys Motion, without waiving her prior Motions for exemptions for costs, to access to a free copy of all filed copies, without the 14 day limit for all documents relating to this case from October 25, 2021, to on or about January 20, 2022 on PACER)(Kelly, Meghan) (Entered: 05/03/2022)
05/03/2022	<u>63</u>	MOTION to Amend/Correct <u>62</u> MOTION for Leave to Proceed in forma pauperis <i>Discrepancy in docs request one copy before access to PACER granted</i> - filed by Meghan Kelly. (Attachments: # <u>1</u> Affidavit Corrected Exhibit DI-62-3, # <u>2</u> Certificate of Service Correction)(Kelly, Meghan) (Entered: 05/03/2022)
05/07/2022	<u>64</u>	AFFIDAVIT of Meghan M Kelly re <u>62</u> MOTION for Leave to Proceed in forma pauperis <i>Discrepancy in docs request one copy before access to PACER granted</i> , <u>61</u> MOTION for Publication of <i>Corrected Original Complaint</i> , <u>63</u> MOTION to Amend/Correct <u>62</u> MOTION for Leave to Proceed in forma pauperis <i>Discrepancy in docs request one copy before access to PACER granted</i> filed by Meghan Kelly. (Attachments: # <u>1</u> Certificate of Service Postage receipt)(Kelly, Meghan) (Entered: 05/07/2022)
05/07/2022	<u>65</u>	MOTION to Amend/Correct <u>62</u> MOTION for Leave to Proceed in forma pauperis <i>Discrepancy in docs request one copy before access to PACER granted</i> , <u>4</u> Exhibit to a Document, <u>61</u> MOTION for Publication of <i>Corrected Original Complaint</i> - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Old marked up differences docket 119, 21, # <u>2</u> Exhibit Newer Lexis missing petitions regarding court disparate treatment, # <u>3</u> Exhibit Clean docket Chancery Court, # <u>4</u> Exhibit Clean docket DE Supreme Court Docket, # <u>5</u> Exhibit add Appendix E. Brief to Supreme Court on appeal, # <u>6</u> Exhibit add Appendix F part 1 Brief to Chancery Exceptions to Masters Final Report, # <u>7</u> Exhibit add Appendix F part 2 Brief to the Chancery Exceptions to Masters Final Report, # <u>8</u> Exhibit add Exhibit A part 1 of 2 to Apendix F Complaint Kelly v Trump, # <u>9</u> Exhibit add Exhibit A part 2 of 2 to Appendix F Complaint, # <u>10</u> Exhibit add Exhibit A 4 to Appendix E Petitioner's Motion to Reign in the courts arms and exhibits thereto filed in the DE Supreme Court, # <u>11</u> Exhibit add Exhibit A 5 to A E Motion to recuse Justice Seitz, # <u>12</u> Text of Proposed Order Proposed Order, # <u>13</u> Certificate of Service Cert of service add missing docs to DI 4, # <u>14</u> Certificate of Service postage receipt)(Kelly, Meghan) (Entered: 05/07/2022)
05/07/2022	<u>66</u>	MOTION to Amend/Correct <u>4</u> Exhibit to a Document, <i>D.I. 4 missing documents filed Oct. 25</i> - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Marked up Old Docket for 119 DE Supreme Court Kelly v Trump, # <u>2</u> Exhibit Lexis's Court link missing vital documents, # <u>3</u> Exhibit Chancery Court Docket 0809, # <u>4</u> Exhibit Clean DE Supreme Court docket, # <u>5</u>

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		Exhibit missing DI 4 Appendix E. Brief to Supreme Court on appeal.pdf, # 6 Exhibit missing Appendix F part 1 Brief to Chancery Exceptions to Masters Final Report, # 7 Exhibit Appendix F part 2 Brief to the Chancery Exceptions to Masters Final Report, # 8 Exhibit Exhibit A part 1 of 2 to Appendix F Complaint, # 9 Exhibit Exhibit A part 2 of 2 to Appendix F Complaint, # 10 Exhibit Exhibit A 4 to Appendix E Petitioner's Motion to Reign in the courts arms and exhibits thereto filed in the DE Supreme Court, # 11 Exhibit Motion recusal, # 12 Text of Proposed Order Proposed Order, # 13 Certificate of Service Missing documents D.I. 4)(Kelly, Meghan) (Entered: 05/07/2022)
05/09/2022	67	NOTICE OF APPEAL of 60 Order, Terminate Motions . Appeal filed by Meghan Kelly. (Attachments: # 1 Exhibit Order appealing, # 2 Certificate of Service Certificate of mailing to Defendants through their counsel)(Kelly, Meghan) (Entered: 05/09/2022)
05/09/2022	68	TRANSCRIPT REQUEST <i>Nor Needed</i> by Meghan Kelly for proceedings held on None, not needed before Judge Chief Justice Colm F Connelly. (Attachments: # 1 Certificate of Service Certificate of mailing of transcript not needed)(Kelly, Meghan) (Entered: 05/09/2022)
05/24/2022	69	Motion to Conform Complaint - filed by Meghan Kelly. (Attachments: # 1 Verification Declaration to Plaintiffs Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Complaint, # 2 Exhibit A Motion for an extension of time due to blackouts, loved ones sickness and deaths, and Wildlife police investigating me due to the federal agents' effigy, # 3 Exhibit B First order for an extension granted by Court, # 4 Exhibit D a motion for a copy of the record, # 5 Exhibit E Motion for an extension of time plus Exhibits A and B C separate, # 6 Exhibit F Order #76 58, 2022, # 7 Certificate of Service Cert of Service of rolling motion, # 8 Certificate of Service Post office receipt for rolling motion)(Kelly, Meghan) Modified on 5/25/2022 (kmd). (Entered: 05/24/2022)
05/24/2022	70	EXHIBIT re 69 Amended Complaint,, by Meghan Kelly. (Attachments: # 1 Exhibit 2, C, continued throughout exhibits, Signature page to Objection, # 2 Exhibit 3, C Memorandum in Support of Objections, # 3 Exhibit 4, C Table of Exhibits to objections, # 4 Exhibit 1 Exhibit A to objections and Memorandum, # 5 Exhibit 2 Exhibit B through J to objections and memorandum, # 6 Exhibit 3Exhibit K Answers without exhibits to objections and memorandum, # 7 Exhibit 4Exhibit K table of contents Ex 1-10, # 8 Exhibit 5Exhibit K Exhibits 11-15)(Kelly, Meghan) (Entered: 05/24/2022)
05/24/2022	71	EXHIBIT re 69 Amended Complaint,, 70 Exhibit to a Document,, by Meghan Kelly. (Attachments: # 1 Exhibit C documents continued, Exhibit N part 1, # 2 Exhibit K Internal Ex 17, # 3 Exhibit N, part 2 internal Exhibit 6 with internal exhibits 2-5, # 4 Exhibit N, part 3 continued with internal exhibits to N, through exhibits to Exhibit O, # 5 Exhibit P) (Kelly, Meghan) (Entered: 05/24/2022)
05/24/2022	72	EXHIBIT re 69 Amended Complaint,, 71 Exhibit to a Document, 70 Exhibit to a Document,, by Meghan Kelly. (Attachments: # 1 Exhibit C continued, Exhibits P2 Q, # 2 Exhibit R, R1, R2 of C, exhibits to objections and memorandum of law, # 3 Exhibit S of C, exhibits to objections and memorandum of law, # 4 Exhibit T to Y of C,exhibits to objections and memorandum of law, # 5 Exhibit AA to FF of C exhibits to objections and memorandum of law, # 6 Exhibit GG, of C exhibits to objections and memorandum of law)(Kelly, Meghan) (Entered: 05/24/2022)
05/24/2022	73	PROPOSED ORDER Rule 15(a)(2), Plaintiffs Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Complaint re 69 Amended Complaint,, 70 Exhibit to a Document,, 71 Exhibit to a Document, 72 Exhibit to a Document,, by Meghan Kelly. (Kelly, Meghan) (Entered: 05/24/2022)
05/25/2022	74	Letter to Clerk of Court from Meghan Kelly regarding Correcting filing category DI 69

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		from Amended Complaint to Motion - re <u>69</u> Amended Complaint,, <u>73</u> Proposed Order, <u>70</u> Exhibit to a Document,, <u>71</u> Exhibit to a Document, <u>72</u> Exhibit to a Document,, (Attachments: # <u>1</u> Certificate of Service of Letter correcting filing entry, DI 69, from Amended Complaint to Motion)(Kelly, Meghan) (Entered: 05/25/2022)
06/03/2022	<u>75</u>	EXHIBIT re <u>69</u> , <u>71</u> Exhibit to a Document, by Meghan Kelly. (Attachments: # <u>1</u> Exhibit Exhibit L to M, of Exhibit C, to Motion contained in DI 69, at 71, # <u>2</u> Certificate of Service Certificate of service of letter regarded inadvertent omission of Exhibit L-M to Exhibit C Addendum to Motion contained in DI 69, at 71)(Kelly, Meghan) (Entered: 06/03/2022)
06/07/2022	<u>76</u>	NOTICE of Docketing Record on Appeal from USCA for the Third Circuit re <u>67</u> Notice of Appeal (Third Circuit) filed by Meghan Kelly. USCA Case Number 22-2079. USCA Case Manager: Pamela (DOCUMENT IS RESTRICTED AND CAN ONLY BE VIEWED BY COURT STAFF) (pb,) (Entered: 06/07/2022)
06/07/2022	<u>77</u>	MOTION re <u>69</u> <i>Motion to include Pleadings filed on June 7, 2022, for the Courts consideration pursuant to her Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Complaint, upon contingent precedent this case remains alive</i> - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit A Respondents Meghan Kellys Motion to exceed the page limits in my Reply to ODCs Corrected Response to Respondents Objections to the Report and Recommendation of the Board on Professional Responsibility, # <u>2</u> Exhibit B Respondents Meghan Kellys Motion to be excused from the notary and affirming requirements in Delaware Court pleadings, # <u>3</u> Exhibit C Part 1 My Reply to the ODC's response to her objections, # <u>4</u> Exhibit C Part 2 My Reply to the ODC's response to her objections, # <u>5</u> Exhibit to C-Exhibit A De-Lapp Letter, # <u>6</u> Exhibit to C-Exhibit B Feb 2021 Bar dues relief request, # <u>7</u> Exhibit to C-Exhibit C Jan 2021 Bar dues relief request, # <u>8</u> Exhibit to C-Exhibit D Aug 23 ltr admitting religious petitions as reason for concern, # <u>9</u> Exhibit to C-Exhibit E 7 of petition religious beliefs as source of petition, # <u>10</u> Exhibit to C-Exhibit F sealed motion 1, # <u>11</u> Exhibit to C-Exhibit G sealed motion 2, # <u>12</u> Exhibit to C-Exhibit H Order in Kelly v Trump, # <u>13</u> Exhibit D D Rough notes concerning the court is my hope of a hero, # <u>14</u> Certificate of Service Postal Receipt, # <u>15</u> Certificate of Service Motion to include Pleadings filed on June 7, 2022, for the Courts consideration pursuant to her Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Complaint)(Kelly, Meghan) (Entered: 06/07/2022)
07/06/2022	<u>78</u>	Letter to Chief Judge Colm F Connelly from Meghan regarding status of case/ case law issues you may be wiser in resolving to save life tenure of federal judges/no longer driving/ way lose food benefits. (Attachments: # <u>1</u> Exhibit Receipt turned in my license plate and suspended insurance, # <u>2</u> Exhibit Letter compelled servitude may be required to have welfare, # <u>3</u> Exhibit Email relating to keeping federal courts impartial, # <u>4</u> Certificate of Service Certificate of service regarding letter updating the court and other concerns which may affect the case)(Kelly, Meghan) (Entered: 07/06/2022)
07/09/2022	<u>79</u>	Letter to Chief Judge Colm F Connelly from Meghan regarding update, Motion to stay 3rd Cir/potential witness/ Supreme Court as an additional defendant because additional injunctive and declaratory additional relief is required/New petition in another forum regarding Food stamps. (Attachments: # <u>1</u> Verification Declaration of letter, # <u>2</u> Exhibit A email, Dr. James Davies, DSM-5, Diagnostic and Statistical Manual of Mental Disorders, # <u>3</u> Exhibit B Order by DE Sup CT Kelly v Trump, # <u>4</u> Exhibit C Petition against volunteering food stamps, # <u>5</u> Certificate of Service Cert of serv, # <u>6</u> Certificate of Service envelope)(Kelly, Meghan) (Entered: 07/09/2022)
07/13/2022	<u>80</u>	MOTION to Stay <i>the proceeding pending a determination in the state proceeding including appeals to the US Supreme Court, or the time for appeal lapses</i> - filed by

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		Meghan Kelly. (Attachments: # <u>1</u> Verification Declaration, # <u>2</u> Text of Proposed Order Plaintiff Meghan Kellys Motion pursuant to FRCP R. 62 and in the interest of justice, to stay the proceeding pending a determination in the state proceeding including appeals to the US Supreme Court, or the time for appeal lapses, # <u>3</u> Certificate of Service to Defendants)(Kelly, Meghan) (Entered: 07/13/2022)
07/17/2022	<u>81</u>	MOTION to Withdraw <u>43</u> Amended Complaint,, Plaintiff Meghan Kellys Motion to Withdraw Plaintiffs Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2) to include additional parties, eliminate a party, include additional facts and include additional requests for relief, dated January 24, 2022, Docket Item 43 and intent to request leave be granted to amend the complaint, as a matter of right, after the state proceeding is complete, including appeals to the US Supreme Court, or the time of appeal has expired, and to serve such Amended Complaint, with an amended praecipe, with corrections, as opposed to the original complaint through the US Marshal - filed by Meghan Kelly. (Attachments: # <u>1</u> Verification Motion to withdraw DI 43, Motion to amend complaint, # <u>2</u> Text of Proposed Order Withdraw of DI 43 Plaintiff Meghan Kellys Motion to Withdraw Plaintiffs Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2) to include additional parties, eliminate a party, include additional facts and include additional requests for relief, dated January 24, 2022, Docket Item 43 and intent to request leave be granted to amend the complaint, as a matter of right, after the state proceeding is complete, including appeals to the US Supreme Court, or the time of appeal has expired, and to serve such Amended Complaint, with an amended praecipe, with corrections, as opposed to the original complaint through the US Marshal, # <u>3</u> Certificate of Service Plaintiff Meghan Kellys Motion to Withdraw Plaintiffs Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2) to include additional parties, eliminate a party, include additional facts and include additional requests for relief, dated January 24, 2022, Docket Item 43 and intent to request leave be granted to amend the complaint, as a matter of right, after the state proceeding is complete, including appeals to the US Supreme Court, or the time of appeal has expired, and to serve such Amended Complaint, with an amended praecipe, with corrections, as opposed to the original complaint through the US Marshal)(Kelly, Meghan) (Entered: 07/17/2022)
07/24/2022	<u>82</u>	MOTION to Amend/Correct <u>69</u> , <u>43</u> Amended Complaint,, <u>2</u> Complaint (Pro Se),, <u>77</u> MOTION re <u>69</u> Motion to include Pleadings filed on June 7, 2022, for the Courts consideration pursuant to her Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Compl DI 2, and DI 69 - filed by Meghan Kelly. (Attachments: # <u>1</u> Verification, # <u>2</u> Exhibit A Article about Judge Smalls retirement, # <u>3</u> Exhibit B Notice Judge Slight is replaced by Vice Chancellor Cook, # <u>4</u> Exhibit C State motion of reconsideration of appointment of counsel despite my 6th Amend assertion to self represent and religious objection to counsel, # <u>5</u> Text of Proposed Order, # <u>6</u> Certificate of Service)(Kelly, Meghan) (Entered: 07/24/2022)
08/17/2022	<u>83</u>	MOTION for E-filing Rights - filed by Meghan M. Kelly, Meghan Kelly. (Attachments: # <u>1</u> Exhibit Delaware Supreme Court Order, # <u>2</u> Text of Proposed Order, # <u>3</u> Certificate of Service)(apk) (Entered: 08/18/2022)
08/22/2022	<u>84</u>	Letter to The Clerk of Court, from Meghan Kelly, regarding intentions of appealing to U.S. Supreme Court. (Attachments: # <u>1</u> Exhibit)(apk) (Entered: 08/25/2022)
08/25/2022	<u>85</u>	MOTION to include addition information in her rolling motion to amend the complaint - re D.I. <u>43</u> First Amended Complaint - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H, # <u>9</u> Exhibit I, # <u>10</u> Exhibit J, # <u>11</u> Exhibit Order from United States Court of Appeals, # <u>12</u> Text of Proposed Order, # <u>13</u> Certificate of Service, # <u>14</u> Envelope)(srs) (Entered: 08/26/2022)

10/17/22, 9:55 AM

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08/25/2022	<u>86</u>	[SEALED] Medical Exhibit (Page from Exhibit J) - re <u>85</u> MOTION (srs) (Entered: 08/26/2022)
08/25/2022	<u>87</u>	Copy of Page 9 of D.I. <u>85</u> Motion received. (srs) (Entered: 08/26/2022)
08/25/2022	<u>88</u>	Letter to Clerk of Court, from Meghan Kelly, regarding Motions for Extension of Time. (Attachments: # <u>1</u> Motion for Extension of Time Filed at DE Supreme Court, # <u>2</u> Exhibit A, # <u>3</u> Exhibit B, # <u>4</u> Exhibit C, # <u>5</u> Exhibit D, # <u>6</u> Exhibit E, # <u>7</u> Exhibit F, # <u>8</u> Exhibit G, # <u>9</u> Exhibit H)(srs) (Entered: 08/29/2022)
08/25/2022		Remark: Additional Copies of exhibits 1, 2, and 3 of D.I. <u>88</u> sent to case jacket 22-mc-340. (srs) (Entered: 08/29/2022)
08/25/2022	<u>89</u>	Letter to Clerk of Court, from Meghan Kelly, regarding Four Outstanding Motions in DE 22-58. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D)(srs) (Entered: 08/29/2022)
08/25/2022	<u>90</u>	Letter to Clerk of Court, from Meghan Kelly, regarding Documents from Delaware Matter 22-58. (Attachments: # <u>1</u> Copy of DE Supreme Court Filing: Reply to ODC's Corrected Response to Objections, # <u>2</u> Copy of DE Supreme Court Filing: Objections to Report and Recommendation on Petition to Transfer to Disability Inactive Status., # <u>3</u> Copy of DE Supreme Court Filing: Memorandum of Law in Support of Objections to the Report and Recommendation, # <u>4</u> Table of Exhibits to Objections, # <u>5</u> Exhibits to Objections, # <u>6</u> Exhibits for Answer, Defenses, and Objections to ODC's Petition)(srs) (Entered: 08/30/2022)
08/25/2022	<u>91</u>	Letter to Clerk of Court, from Meghan Kelly, regarding Documents from Delaware Matter 22-58. (Attachments: # <u>1</u> Exhibit 16, # <u>2</u> Exhibit 17, # <u>3</u> Exhibit L, # <u>4</u> Exhibit M, # <u>5</u> Exhibit N, # <u>6</u> Exhibit 2-5, # <u>7</u> Exhibit 6-10, # <u>8</u> Exhibit P, # <u>9</u> Exhibit P-2, # <u>10</u> Exhibit Q, # <u>11</u> Exhibit R, # <u>12</u> Exhibit S, # <u>13</u> Exhibit T, # <u>14</u> Exhibit U, # <u>15</u> Exhibit V, # <u>16</u> Exhibit W, # <u>17</u> Exhibit X, # <u>18</u> Exhibit Y, # <u>19</u> Exhibit AA - FF, # <u>20</u> Exhibit GG-JJ)(srs) (Entered: 08/30/2022)
08/30/2022	<u>92</u>	Letter to Judge Colm Connolly, from Meghan Kelly, regarding being put on speaker phone. (apk) (Entered: 08/31/2022)
08/30/2022	<u>93</u>	Letter to Judge Colm Connolly, from Meghan Kelly, regarding three reciprocal orders. (Attachments: # <u>1</u> Exhibit)(apk) (Entered: 08/31/2022)
08/30/2022	<u>94</u>	CERTIFICATE OF SERVICE of D.I. <u>92</u> Letter by Meghan Kelly (Attachments: # <u>1</u> Exhibit D.I. <u>92</u> Letter)(apk) (Entered: 08/31/2022)
10/11/2022	<u>95</u>	MOTION to alter and amend Orders D.I. <u>31</u> D.I. <u>17</u> and D.I. <u>60</u> . Motion to Stay the Proceeding until the State Proceeding is concluded, including appeals to the US Supreme Court or the time the appeal has concluded - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Text of Proposed Order, # <u>5</u> Certificate of Service, # <u>6</u> Envelope)(mpb) (Entered: 10/13/2022)
10/11/2022	<u>96</u>	SECOND MOTION to Stay the Proceeding until the conclusion of Respondent's originating disciplinary proceeding until a final non-appealable determination is made or the time of appeal has lapsed. MOTION to Amend D.I. <u>43</u> Amended Complaint 30 days after the stay is lifted. - filed by Meghan Kelly. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit B-1, # <u>4</u> Exhibit D-1 Internal Exhibit for B-1, # <u>5</u> Exhibit F-1 Internal Exhibit for B-1, # <u>6</u> Exhibit C, # <u>7</u> Exhibit D, # <u>8</u> Exhibit E, # <u>9</u> Exhibit F, # <u>10</u> Exhibit G, # <u>11</u> Exhibit H, # <u>12</u> Text of Proposed Order, # <u>13</u> Certificate of Service, # <u>14</u> Envelope)(mpb) (Entered: 10/13/2022)

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MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

December 11, 2020

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

REGISTERED CHANCERY
GEORGETOWN DELAWARE
2020 DEC 11 P 12: 52

RE: Meghan Kelly v. Donald J. Trump, et. al, Case No. 2020-
Master PWG

Thank you/New Supreme Court Order

Dear Honorable Master Patricia Griffin:

Thank you for your letter. I thought I was going to get into trouble with you. Instead, you bestowed me kindness and mercy.

It made me teary eyed with unexpected joy by your kind act.

Usually, when I ask for help, I get into trouble from those I ask.

When I was in law school, I had rats in my apartment during my final exams and bar exams. I asked the Christian law school I leased the apartment from, Duquesne, for help. They did not help me. Instead, they increased my rent. The newspapers helped me, and the tv station helped me.

Did I get rescued out of the situation? No. But they remain my heroes because they did the right thing. That is more important than winning or losing. See attached under Exhibit A.

During my Delaware Bar Exam studies at Weidner Law School, my dorm ceiling leaked water all over my bar materials. I asked for help from Weidner and reached out to the Board of Bar examiners. I got scolded by the administrator of the bar in a private room instead.

When I ran for office as a democrat, the democrats did not help me, and appeared to sabotage my run, per my complaint which is an exhibit to the brief.

You know who did help me? The press. They allowed me to share my ideas on paper, impartially, just as they allowed the other side to do the same.

That is why the press is my hero. I lost, but they gave me, the voiceless a voice.

You are my hero too. Winning or losing is not most important, doing the right thing is. Allowing all people, regardless of wealth, poverty, political party, religion, race or place of origin an opportunity to seek justice, which is never guaranteed, is the right thing.

Thank you for doing the right thing for a peon like me, by affording me the opportunity to sue the most powerful man in the world. It is not me I have faith in. It is you (God too), the court system, democracy, and the pursuit of justice. Our system of government recognizes how imperfect man

is, by instilling checks and balances which limits the three imperfect branches. So, none would proudly assert imperfect dominion. Each branch remains humbled at the prospect of potential correction, your potential edification. No branch, nor any human is perfect. None are God but God.

I am sorry if I let the Court, democracy and God down in this case. If I should fail to plead sufficiently, I will just get right back up and try to do the right thing again differently with humility.

I am kind of getting used to falling down now, but I am not used to those in authority helping me up, as you have done by your letter, and as the Delaware Supreme Court has done by allowing for pleadings to be filed by email too, per Order Number 6. Exhibit B.

I emailed Brenda McKinnon, in the upper Delaware Chancery Court my brief and the exhibits attached thereto on Monday December 7, 2020 completed at 10:20 AM. I mailed the Court everything on Monday December 7, 2020, and the post office indicated it was received on December 8, 2020 at 8:17 am. Exhibit C.

But she has not been able to confirm receipt yet. So, I may have to file again in your office.

I forwarded the E-mailed filed documents to Katrina Krugar, and asked for her to please hang onto them and standby in case upper Delaware continues to have trouble receiving the documents.

For your convenience, I am also dropping off a set of the filed documents to possibly ease in filing in case upper Delaware needs help. If not, in case I succeed, it would be good for you to have a copy too.

If the Upper Delaware Court needs help filing, would you please help them and me by filing it on the December 7, 2020 date, 10:20 AM, with only one court stamp confirmation on the Brief to alleviate the burden on the Court. The Court need not stamp every document.

Should my case remain alive, the Delaware US Attorney General will likely seek to remove my case to the federal court since he knows my concerns about driving and mailing.

I do not regret putting my foot into my own mouth. I believe that your Court will save not only America, but the World. You do not need me for this Court to do so.

I think whichever Court hears my case, they will have power to save the world too, just not as much power as you, and the Delaware Chancery Court.

I believe the Courts will be our heroes in history. I believe their words are more powerful than weapons. The impartial rule of law is more powerful than reign by those with money, power and connections without restraint called enforceable laws.


We are not a nation of sword fights, gun duels and fist fights. We are a nation of laws that limits all people, with more limits on those with power in the government, to make the common man, even a peon like me, somehow more equal to the most powerful person in America, the President.

The limits on our Constitutional freedoms in the form of laws, makes us all more free.

The fact Americans must respect (to an extent) the freedoms of others, and, in turn, others must do the same by honoring such limits, makes us all more free.

Lawlessness is not freedom. Deregulation is not freedom. It is anarchy.

Thank you,


Meghan Kelly, Esquire
Pro Se, Bar # 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 988)

CC. Attorney General William Barr, Esq.

EXHIBIT

A



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Lawrence Walsh: Rat is unwelcome study partner



Wednesday, June 29, 2005

By Lawrence Walsh, Post-Gazette Staff Writer

Celebrations
Birthday greetings, engagements, weddings & more

A pregnant rat running between your legs in your bedroom isn't conducive to studying for final exams.

Travel Getaways
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That's what Meghan Kelly said happened to her in early May in her 10th-floor apartment in Brottier Hall at Duquesne University. The 20-story building was formerly known as Citiline Towers and the Cricklewood Hill Apartments.

post-gazette.com
Headlines by E-mail

"I haven't been able to get a good night's sleep since it happened," said Kelly, a law school graduate now studying for the bar exam next month.

She said the rat ran under a bed and into a hole beside the heating and air-conditioning unit in a bedroom.

Kelly notified the university. The university sent an exterminating company to inspect her room. It found no evidence the rat had taken up residence in the apartment, but it put out traps to capture any transient rodents.

Then Kelly found a baby rat in a trap. She again called the university. The exterminator returned for another inspection, but found no signs that mama rat had made herself at home. They again set out traps.

After successfully passing her law school exams last month, Kelly began studying for the bar exam. Law school graduates must pass the two-day test to obtain a license to practice law in Pennsylvania.

Unnerved by her encounter with the pregnant rat, Kelly said she tried to

<http://www.post-gazette.com/pg/05180/530005.stm>

10/15/2006

sleep as best she could. She initially thought a tapping sound she heard next to the head of her bed came from a heating and cooling unit. Then she thought it might be a rat trying to get out.

She called the Allegheny County Health Department. She also contacted the Pittsburgh Post-Gazette.

Dennis Lauria, a county environmental health specialist, inspected her apartment last Tuesday. He ordered the university to place rat glue traps under the heating and cooling units in each room. The traps are designed to trap rodents by attracting them to the sticky surfaces that prevent them from moving after they step on them.

Lauria also ordered the university to repair a hole in the ceiling of a hallway closet in Kelly's apartment. Although he found no evidence of rodents in her unit, he found some on the ground level of the building.

He found "rodent droppings, carcasses, rub marks, chewed areas or burrows" in the garage. He also noticed that rodents could crawl under the closed garage doors. He ordered the university to "rodent-proof the garage doors" and to "remove food sources, harborage areas and eliminate entries."

Lauria also said the garbage storage area had garbage on the floor. He ordered that it be cleaned up and that bait stations be placed in the garbage storage and receiving areas. He found rat ground burrows about 20 feet from the two garage doors, one of which is open during the day to provide egress and ingress for employees and workers renovating the building.

At Kelly's invitation, I accompanied Lauria on a reinspection of her apartment yesterday. He found mouse droppings and mouse hair on a glue trap under one of her heating and cooling units. "I'll add that to my report," he said.

During a reinspection of the ground level of the building, Lauria said building employees had done a lot of clean-up work since his first visit. There was no garbage on the floor of the garbage receiving and storage areas. But at least one rat had entered the garage. Visible evidence of its presence was near a trap that had been sprung.

Although Lauria gave the university until July 12 to comply with the orders he issued last week, he said employees already had corrected most of them.

He was impressed with the steel strips attached to the bottom of one of the garage doors to keep out four-legged trespassers.

"We take this matter very seriously," said Bridget Fare, a university spokeswoman. "We started addressing it the day after [Kelly] notified

us. We are working with the health department to address it and we will continue to monitor it."

I'll keep you posted.

Post Your Problems appears Tuesday through Friday, addressing questions and problems from readers. Yvonne Zanos from KDKA-TV looks into consumer-related issues, including difficulties with products and services. Post-Gazette Staff Writer Lawrence Walsh helps sort through bureaucratic problems.

(Lawrence Walsh can be reached at 412-263-1895. His e-mail address is lawrence.walsh@post-gazette.com.)

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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
)	No.: 1:21-cv-01490-CFC
Defendants.)	

**Appellant Plaintiff Meghan Kelly’s Opening Brief
moving the Third Circuit Court of Appeals to vacate the Delaware
District Orders (DI. DI 16-17, 30-31, 59-60), and to remand the matter
to the Delaware District Court for consideration**

I, Meghan M. Kelly, Esquire, hereby certify that on 10/22/22, I
had a true and correct copy of the above referenced document sent to all
Defendants through their attorney,

Zi-Xiang Shen
Delaware Department of Justice
Carvel State Building 820 N. French St. 6th Floor
Wilmington, DE 19801, served via E-filing:

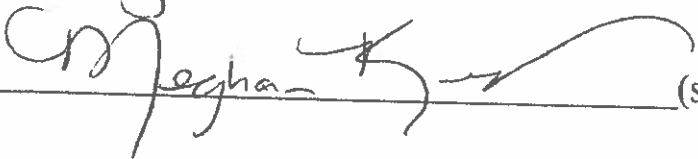
Dated October ~~21~~, 2022 *MK*
Oct. 22, 2022

Respectfully submitted,
/s/Meghan Kelly
Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 493-6693
meghankcllyesq@yahoo.com
Acting as unrepresented indigent
party, unrepresented by counsel

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

Dated: 10/22/22

Meghan Kelly, (printed)

 (signed)

APPENDIX E

U.S. COURT OF APPEALS, THIRD CIRCUIT

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

Appellant Plaintiff Meghan Kelly’s Motion to recuse the Honorable Thomas Hardiman and the Honorable Tamika Montgomery-Reeves from participating in this Case to preserve my Due process Rights under the 5th

I Meghan Kelly, pursuant to my 5th Amendment right to a fair trial to defend the exercise of my 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law move for the recusal and to prevent the participation of two judges on the Third Circuit in this matter and related matters, the Honorable Thomas Hardiman and the Honorable Montgomery-Reeves who is scheduled to be inducted in February 2023.

1. In law school, I did a non-paid clerkship through Duquesne with the Honorable Thomas Hardiman in his District Court.

2. I have the highest regards for the Honorable Thomas Hardiman. Although I disagree with his dissent in NAACP v City of Philadelphia, Case Number 15-1002 for the same reason I disagree with some recent US Supreme Court cases.

3. First Amendment Freedoms must be safeguarded, not sold, sacrificed or diminished for business interests in making money or jobs. Honorable Hardiman's analysis substantially burdens liberties in exchange for businesses seeking money and material interests. A legitimate government interests must not be supported in contravention of the Constitutional limits on government. US Amend I.. It is wrong to sacrifice people or their liberty, including political speech, for money or material gain. Human sacrifice or compelled slavery in a fixed government backed forced market is always wrong no matter the riches exploiting government backed private or foreign entities in the community gain.

4. Governments should govern entities, not collude by partnering with them, making partners essentially above the law.

5. Regardless of my concern of his one dissent, the Honorable Justice Thomas Hardiman is brilliant, fair and kind, but it would be weird and uncomfortable to allow someone I know personally to judge me.

6. I am acting as a party, a person with a background life, not a mere attorney performing professional business. I care about him as a human in real life. I might be at a loss of something more than a case should someone I esteem beyond the court rule against me.

7. I confess I used to send his office Christmas cards for years. Though I no longer celebrate Christmas as it violates the teachings in the Bible. I did not realize I sinned against God by sending cards. I am sorry.

8. In *Jeremiah* 10 of the Bible God teaches us not to cut down trees to decorate them. Jesus teaches us not to celebrate the traditions of men which violates God's law under the guise of serving God as hypocrites. Citing *Matthew* 15: 3 "Jesus replied, "And why do you break the command of God for the sake of your tradition." I love God and love others. I do not desire to disobey God while misleading others to worship in a way that misleads them to potentially be damned to hell. In the Old testament a ruler celebrated similar pagan holiday festivities. Scripture teaches, "He did evil in the eyes of God." Then, boom he died. I believe he will go to hell on judgment day losing eternal life for partying and misleading the people into believing lusts is love.

9. Celebrating societal compelled traditions misleads people to believe the lie peer pressured gifting is love, when it is not unconditional love. It is societally forced gifting. I believe the lie drives out love from the hearts of men, replaced with the mark of the beast, conditionally caring, with no God in man.

10. On an aside, I do not celebrate birth dates either because I believe celebrating birth anniversaries like holidays also misleads people to thinking leading to damnation in hell.

11. In *Isaiah* 14, scripture teaches Satan wanted to be his own God. We celebrate ourselves like we are God on birth dates. Birth dates arose in pagan cultures. In Rome, rulers declared themselves born as a god when they took the throne. They celebrated with food and cakes. The common folk, even women and children began to celebrate their birth date as if they became a god too. I do not desire to sin against God. So, I repent of this, by turning away, sinning no more. In addition, I believe it is sin to classify people based on physical traits such as age. Per the attached newspaper, when asked my age for the paper, I replied “I am ageless.” Exhibit A.

12. Allowing Honorable Judge Thomas Hardiman to judge me creates the appearance of impartiality. In DI 101-5, Exhibit C, you will find a picture of the Honorable Thomas Hardiman and I when I had the privilege of clerking with him through Duquesne. I attach a fresh copy as Exhibit B, and incorporate herein by reference.

13. On January 3, 2022, I received an E-mail indicating the Honorable Judge Tamika Montgomery-Reeves was appointed to the Third Circuit as judge, I attach hereto and incorporate herein by reference as Exhibit C.

14. On January 24, 2022, I filed a motion to amend my complaint as a matter of right and included Honorable Tamika Montgomery-Reeves, as a Defendant in this case. DI 43.

15. It is impermissible to allow a judge to participate in a matter where they may be called as a party.

16. I request she be screened from discussions in this case please. It would prejudice my ability to have a fair trial when a potential Defendant is a judge. It prejudices me as she is a participant in the facts arising in this case where I allege the Delaware Supreme Court members including Honorable Tamika Montgomery-Reeves violated my substantive and procedural due process rights, and equal protection rights by denying me a meaningful opportunity to be heard, selectively disparately treating me based on disdain for my religious-political beliefs, preventing discovery, concealing evidence in my favor, appointing counsel despite my religious First and Sixth Amendment objections and other violations I outlined in my initial brief and below on the record. See DI 18, 21-24, 29, 34-44, 47-51, 53-58, 61 through 77, I incorporate herein by reference.

17. On an aside, I am not intending to seek to be in the government. Do not worry. I believe government has reduced freedoms in order to safeguard the freedoms of those they serve by potentially being diminished even by their religious voice. I let that go of government and was no longer silent about my faith in Jesus when the government persecuted me by inciting unrest against me and others who did not conform to political pressured worship in Trump or government belief.

18. While I seek to preserve our government by eliminating corruption, I am aware that there is an agenda to dismantle it. I hope to have the opportunity to warn the courts about it to safeguard not destroy the courts.

19. Upholding the Constitutional law by all three branches preserves the people's faith in a fair system, even by upholding the rights of minorities like me, who believe differently as a party of one.

20. I am scared. Please do not throw me away to the wolves. Please protect me. When I ran for office in 2018, shipped in out of staters had a healthcare agenda I strongly disagreed with. It was as if they knew of the agenda for a pandemic. They also knew of the attacks on the vote as if it was in an agenda.

21. In Kelly v Democrats you will see how I averred those within the party asked me not to run. Both democrats and republicans who seek to buy puppets in office see me as a threat to demean as disabled or eliminate.

22. My faith in Jesus Christ is made of sound mind, no matter how repugnant others find my unique private religious beliefs.

Wherefore, I pray this Court grants this motion

January 3, 2023

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
Not acting as a lawyer

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

Dated: 1/3/23

Meghan Kelly (printed)


 (signed)

Exhibit A

Meet the candidates

20th Rep. District

Republican incumbent Rep. Steve Smyk, R-Milton, is being challenged by Democrat John Buccchioni and Libertarian Harry Smouse.

DEMOCRAT

John Buccchioni

Age: 67
Hometown: Milton
Family: Married, three children and five grandchildren



John Buccchioni

Education: Bachelor's degree and master's degree
Relevant experience: Public school teacher in North Philadelphia; adjunct university professor; businessman; CEO for various mid-sized international consumer product corporations; elected national president of the National Association of Fundraising Companies; reoccurring panel member on the Global Consulting Practicum. The Wharton School, University of Pennsylvania. Member of Milton Lions Club, Lewes American Legion Post 17, Sussex County League of Women Voters and The Beau Biden Foundation Committee
Top reason for running: Our local future requires reforming the current political will. We need representation for all citizens of Harbeson, Lewes, and Milton, not a privileged few.

REPUBLICAN

Stephen Smyk

Age: 53
Hometown: Harbeson
Family: Wonderful wife of 29 years, Judy; daughters, Leah and Sydney, and son Gabe



Stephen Smyk

Education: Sussex Central H.S., associate's degree in business administration, Delaware Technical Community College; U.S. Army technical and leadership schools, Warrant Officer Course, Fort Rucker; federal and state law enforcement training courses in leadership, traffic, criminal and counter-terrorism investigations
Relevant experience: Incumbent representative 2012-2018, Delaware House of Representatives 20th District; retired trooper, Delaware State Police; veteran, Delaware National

Guard; member, Delaware Mobile Surf Fishermen; charter member, Midway Lions Club; former youth coach, Henlopen Soccer Club, Milton Little League baseball and softball; member, American Legion Post 17; immediate past president, Delaware State Troopers Association; past board member, National Troopers Coalition; member, Endeavor Lodge, Milton

Top reason for running: Public service is an opportunity to advance the common good. I will continue to effect positive change on behalf of the residents of our district.

LIBERTARIAN

Harry R. Smouse Jr.

Age: 54
Hometown: Milton
Family: girlfriend, two daughters
Education: Some college



Harry Smouse

Relevant experience: Environmental technician with Dry-Tek Environmental in Salisbury, Md.; previously worked at Mr. Go-Glass for 17 years
Top reason for running: I'm a dissatisfied voter who would like to see change in Dover.

36th Rep. District

Democrat Donald Allan and Republican Bryan Shupe are running for the seat vacated by retiring Harvey Kenton.

DEMOCRAT

Donald M. Allan Jr.

Age: 37
Hometown: Milton
Family: Wife, Carrie and daughter, Josie, 4



Donald Allan

Education: Rising Sun H.S.; Cecil County School of Technology; Delaware Technical Community College
Relevant experience: Working in construction industry in Sussex County since 2003, installing kitchen cabinets and managing projects. I will bring a blue collar work ethic and mentality to our state Legislature
Top reason for running: Focus on fixing water quality issues plaguing Sussex County, strive for equitable funding for public schools, and ease the tax burden of middle- and working-class Delawareans.

REPUBLICAN

Bryan Shupe

Age: 34
Hometown: Milford
Family: Wife, Sherry and daughter, Evelyn, 2



Bryan Shupe

Education: Bachelor's degree in Political Science, University of Delaware
Relevant experience: Two-term mayor of Milford; owner of two small businesses in 36th District, Fur-Baby Pet Store and milfordlive.com
Top reason for running: My experiences as a public servant and small business owner have given me unique opportunities to help improve our local economy, infrastructure and water quality.

38th Rep. District

Republican incumbent Rep. Ron Gray, R-Selbyville, is being challenged by Democrat Meghan Kelly.

REPUBLICAN

Ron Gray

Age: 62
Hometown: Selbyville
Family: Wife, Candice; sons, Zachary and Maclean; daughter, Jacqueline and son-in-law, John Mumper



Ron Gray

Education: Indian River High School, bachelor's degree in civil engineering from University of Delaware, master's in business administration from Indiana University
Relevant experience: First elected in 2012 as state representative for the 38th District; operates several family businesses in his district.
Top reason for running: To work as a business advocate to preserve existing jobs and promote new opportunities for our children. To support more efficient and cost-effective government.

DEMOCRAT

Meghan M. Kelly

Age: Not applicable. I am ageless.
Hometown: Dagsboro
Family: Father, Pat Kelly; mother, Mary Batten Kelly; sister, Amanda Kelly Gordines;

brother, Andy Kelly
Education: Lord Baltimore Elementary, Selbyville Middle, Indian River H.S., bachelor's degree, University of Delaware, juris doctor from Duquesne School of Law
Relevant Experience: Licensed to practice law, licensed to teach. While in law school, interned with the Honorable Justice Thomas Hardiman, nominee for U.S. Supreme Court and current justice Third Circuit Court of Appeals. I've reviewed and commented on proposed laws for over 10 years, and discovered I had a passion to revise them to better serve people I grew up with and love



Meghan Kelly

Top reason for running: To protect personal liberties, keep taxes low, reduce regulations, encourage job creation, defend the Second Amendment and to make the American dream accessible to everyone
Top reason for running: Two years ago, I found a lot of money not taxed by the state relating to out-of-state real estate title insurance companies. I am stepping up to confront the issue.

degree in music education, University of Delaware
Relevant experience: Elected to the Delaware House of Representatives in 2014; farmed for over 40 years and currently operates a small farm in the 41st district; licensed insurance agent for 38 years and owned Access Insurance until March 2017; legislative liaison to the General Assembly for 13 years for a nonprofit organization; have served on many government committees and task forces

DEMOCRAT

Bradley S. Connor

Age: 57
Hometown: Bethany Beach
Family: Married, 36 years to wife, Penny. Two children



Bradley Connor

Education: Graduate, Indian River H.S., associate's degree, Salisbury State College
Relevant experience: Sussex County Association of Towns, Delaware League of Local Government; mayor of Dagsboro, Lions Club, Southern Sussex Rotary, Dagsboro Planning and Zoning.
Top reason for running: My government experience has afforded me many useful partnerships within the state and its agencies. Those partnerships will be used to benefit District 41.

41st Rep. District

Republican incumbent Rep. Rich Collins, R-Millsboro, is being challenged by Democrat Bradley Connor.

REPUBLICAN

Rich Collins

Age: 69
Hometown: Millsboro
Family: Wife, Susie; three children; five grandchildren
Education: Bachelor's



Rich Collins

Survey Says

68% of Cape Gazette readers responded to a recent poll in Cape Gazette print edition and at capegazette.com.

Are state officials sufficiently monitoring water quality in Sussex County?



Exhibit B



Exhibit C

Re: 21-3198 Fw: [DSBA] On behalf of the Judicial Nominating Committee - Notice of Vacancy - Supreme Court of Delaware

From: Meg Kelly (meghankellyesq@yahoo.com)
To: zi-xiang.shen@delaware.gov; caneel.radinson-blasucci@delaware.gov
Cc: meghankellyesq@yahoo.com; david.weiss@usdoj.gov
Date: Tuesday, January 3, 2023 at 07:32 PM EST

Good evening,

What is your position on a motion to recuse Justice Hardiman and Justice Reeves?

Thank you,
Meg

On Tuesday, January 3, 2023 at 06:02:49 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good evening,

With two members of the DE Supreme Court retiring or moving to the Third Circuit, this poses a concern for me.

Thank you,
Meg

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

From: Administrator@dsba.org <administrator@dsba.org>
To: dsba@delawlist.org <dsba@delawlist.org>
Sent: Tuesday, January 3, 2023 at 05:42:19 PM EST
Subject: [DSBA] On behalf of the Judicial Nominating Committee - Notice of Vacancy - Supreme Court of Delaware

NOTICE

The Judicial Nominating Commission gives public notice that it has received notification from the Governor that the following office may be filled by the appointment of the Governor with the concurrence of the Senate:

Justice of the Supreme Court of the State of Delaware

(Due to the appointment of Justice Montgomery-Reeves to the
United States Court of Appeals for the Third Circuit)

The appointee shall be admitted to the practice of law before the Supreme Court of the State of Delaware. Per Article IV, §2 of the Delaware Constitution, the appointee must: (i) be a citizen of the State of Delaware; and (ii) learned in the law. The position of Justice of the Supreme Court provides a current annual salary of \$212,315.

Persons who meet the legal qualifications of the office described above are invited to file with the Commission a completed copy of the "Questionnaire for Nominees for Judicial Office." The Questionnaire is available online at <http://courts.delaware.gov/career/> under the heading "Judicial

Officer Postings.”

Any person who wishes to suggest candidates may write to the Commission.

Completed Questionnaires must be received no later than **12:00 pm (noon) on Tuesday, January 31, 2023** at the address listed below. Applicants must also email a copy of all application materials no later than **12:00 pm (noon) on Tuesday, January 31, 2023** to JNC@delaware.gov. **Submissions that do not satisfy both requirements will not be accepted.** The Commission will schedule interviews of candidates promptly thereafter.

Arthur G. Connolly, III, Esq., Chairman

Judicial Nominating Commission

Connolly Gallagher LLP

1201 North Market Street

Wilmington, DE 19801

(302) 757-7300

Dated: January 3, 2023



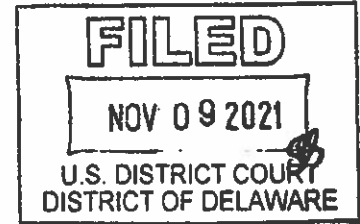
www.dsba.org

Sent via the Delaware State Bar Association's DSBA mailing list
DSBA@barlist.delawlist.org
<https://www.dsba.org>

APPENDIX F

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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



Plaintiff's Motion to Amend Plaintiff's Motion for reargument

Plaintiff Meghan Kelly, pro se, brings this motion to amend her motion for reargument pursuant to Pursuant to FRCP 15.

Pursuant to FRCP 15 (a)(1) (1) "A party may amend its pleading once as a matter of course within 21 days after serving." On Saturday November 6, 2021, I mailed a motion for reargument by certified mail, sent to both the Court and Defendant's counsel. On November 6, 2021, by separate US Mail, I sent the proposed order to the court and defendant's counsel. This is within 21 days.

My computer is broken and is in repairs. (Exhibit 1, proof of mailing.) I alerted Defendants through their counsel of my repairs, with attached pictures. (Exhibit 2 Email to counsel. Typing is not my strong point. My apologies.) Today, I was informed my computer is not fixed. (Exhibit 3, Email from insurance provider).

I am in immediate danger, and was required to send the Motion for reargument, on Saturday before noon to alert the court in hopes to prevent immediate irreparable injury to me and the public, on arguments I am likely to win under 42 USC Sections 1983, 1985(2), 1988 and the First Amendment applicable to Defendants pursuant to the Fourteenth, with no harm to Defendants, where Defendants' interests do not meet strict scrutiny, allowing them to persecute

me based on my beliefs in Jesus Christ. I had to send it regardless of typos, without opportunity to correct to prevent immediate, irreparable injury to me, and continuous irreparable injury to me.

I care more about my ability to exercise my religion freely, and openly without threat of government persecution than I care about my license, and ability to work at my old law firm performing real estate settlements down the line, as I do not enjoy litigation. So, I looked at registration to see whether I could deactivate my license to practice law. Even though I have not practiced law in 6 years, it indicated I could not deactivate my license due to the ODC filing on November 3, 2021. (Exhibit 4)

I came before the Court to protect my First Amendment rights, and subordinately prevent punishment for my faith in Jesus by Defendants who seek to place my active license on inactive disabled. It is insulting to me. My faith in Jesus is not a disability. My poverty is not a disability.

On Friday, November 6, 2021, I was served papers by Defendants seeking an order against me which would violate my faith in God by allowing them to examine me by a mental health expert. 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 other, or you will be devoted to the one and despise the other. You cannot serve both God and money.” I choose God).

I was so shaken up, my heart hurt so badly, and I was trembling as I rushed to the post office to prevent irreparable injury, that the post office official, April, called the police to check up on me as I indicated I was not safe from government sponsored threats motivated to suppress my speech, petitions, association and exercise of religious faith in Jesus Christ, based on their disagreement in my faith in Jesus. I said, “they are going after me for my faith in Jesus. (Exhibit 5, police report) I am permitted to worship or not according to the dictates of my conscience, not the dictates of the government.”

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.

I was under great distress, and remain under great reasonable distress. My heart is hurting.

A state trooper made a wellness check November 6, 2021. I was humiliated and embarrassed to share my religious beliefs, persecution, and poverty with the kind State Trooper. I told the trooper that a stranger talked about shooting me in Dagsboro because of my stickers. He asked, “Why didn’t you call the police.” I responded I thought I did. I went to the state police, Millsboro, Dagsboro and Bethany police department to retrieve the report too. I did not realize until November 7, 2021, after I thought about it, that the fully uniformed officer I told, who inspected my car at World Gym in Millsboro, was probably acting a fellow kind gym mate, acting off duty or outside of his jurisdiction. (Exhibit 6, car with substance thrown at it for my speech).

Per my Complaint at paragraphs 42, 48, 89, 98, 112, 149, 156, 201, 268-290, 292-294, 306-308, 365-480, D.I. 2, D.I. 3, D.I. 4, with focus on US Ex 43 relating to healthcare, US Ex 2 the law suit against the Democrats regarding healthcare concerns, Exhibits 21-25 my emails providing notice for Defendants to desist based on religious objections to examinations District Court, Us Exhibit the outline of my religious objections in my writ of certiorari, the outline of my rejections to mental healthcare in my motion to the Delaware Supreme Court, and Exhibit A-4, my motion to the Delaware Supreme Court to reign in its arms through its agents from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion by relief it deems just, where I declare my objections to psychology and mental health..

I was under great distress, and remain under great reasonable distress should you find my beliefs are genuine.

A state trooper, Officer Partyka, made a wellness check November 6, 2021. I was humiliated and embarrassed to share my religious beliefs, persecution, and poverty with the kind state trooper.

I told Officer Partyka that a stranger talked about shooting me in Dagsboro because of my stickers. He asked, "Why didn't you call the police." I responded I thought I did. I went to the state police, and the Millsboro, Dagsboro and Bethany police department to retrieve the report. I did not realize until November 7, 2021, the fully uniformed officer I told, who inspected my car at World Gym in Millsboro after someone threw substance all over it but for my stickers, "No one is above the law, No one is below the law," "Impeach," "Serve your country not your seat," was probably a fellow kind gym mate, acting off duty or outside of his jurisdiction. (Exhibit 6, a picture of substance on my car). That is why I could not retrieve the report I looked for. D.I. 2, 3, 4.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds, which also shook me up. Per my Motion and Memorandum for a preliminary injunction and complaint, going into debt is against my religious beliefs. D.I. 6, 7,8, 9,10.

I objected to appointed counsel on religious grounds. 1. Going into debt violates my religious beliefs 1. as outlined in the preliminary motion and memorandum, 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.

As to the case before you, I am not so sure. I need to pray about it. The cases relate to my religious beliefs. My beliefs are at issue.

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.

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 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.)

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. D.I. 4, Ex 2, Ex 50, Ex 51. 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.

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.

Children are trained 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 pressure which is not unconditional love. 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. 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 disables. 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 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 God, the lost, the unsaved, those not yet adopted by God. Christians are known by their love. 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 and become dumb and blind adults, who are less likely will be saved from hell, by seeking truth in all things, rather than ignoring it. (See, Hosea 4:6, “my people are destroyed from lack of knowledge.”) 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 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. I believe forced comas and drugs that inhibit people’s faculties prevent them from going to heaven, and guarantee their damnation in hell, and the damnation in hell for the unconcern of by standers. 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. per US Exhibit 43. 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. I also proposed a way to transition into universal care. Healthcare brings in more money than any other industry in the world, wrongly 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. D.I. 3, District Court Ex 6, See, <https://www.worldometers.info/>. The second most lucrative industry is healthcare marketing under the guise of education, per worldometer. D.I. 4.

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 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.

Defendants threaten me with the fires of hell.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds, which also shook me up. Per my Motion and Memorandum for a preliminary injunction and complaint, going into debt is against my religious beliefs.

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

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

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

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

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

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

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

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

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

Wherefore, I respectfully request this Court grant my order.

Dated November 8, 2021


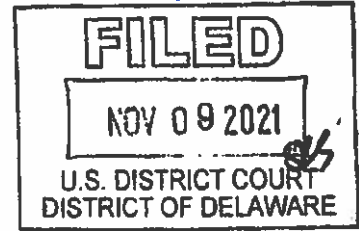
Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,319 Count)

Exhibit 1





DAGSBORO
28290 CLAYTON ST
DAGSBORO, DE 19939-9998
(800)275-8777

Product	Qty	Unit Price	Price
11/06/2021			12:00 PM
First-Class Mail® Large Envelope	1		\$2.36
Wilmington, DE 19801 Weight: 0 lb 6.20 oz Estimated Delivery Date Tue 11/09/2021			
Certified Mail® Tracking #:			\$3.75
70210350000131665646			
Return Receipt Tracking #:			\$3.05
9590 9402 6766 1074 8891 56			
Total			\$9.16
First-Class Mail® Large Envelope	1		\$2.16
Wilmington, DE 19801 Weight: 0 lb 5.90 oz Estimated Delivery Date Tue 11/09/2021			
Certified Mail® Tracking #:			\$3.75
70210350000131665653			
Return Receipt Tracking #:			\$3.05
9590 9402 6766 1074 8891 63			
Total			\$8.96
Grand Total:			\$18.12
Cash Change			\$20.00 -\$1.88

USPS is experiencing unprecedented volume increases and limited employee availability due to the impacts of COVID-19. We appreciate your patience.

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Preview your Mail
Track your Packages
Sign up for FREE ®
<https://informedelivery.usps.com>

Earn rewards on your business account purchases of Priority Mail labels with the USPS Loyalty program by using Click and Ship. Visit www.usps.com/smallbizloyalty for more info.

United States Postal Service
NOW HIRING NATIONWIDE
Career Path Positions with Benefits
Apply online at
www.usps.com/careers

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

7021 0350 0000 3166 5656

CERTIFIED MAIL RECEIPT
DOMESTIC MAIL ONLY

To: **Wilmington, DE 19801**

Combined Mail Fee: **\$3.75**

Postage: **\$2.36**

Total Postage and Fees: **\$9.16**

Date: **11/06/2021**

Postmark: **0939 03**

Sender: **Del Atty General
Kathleen Jennings 520 N.
W. Ln DE 19801 French St**

7021 0350 0000 3166 5656

U.S. Postal Service
CERTIFIED MAIL RECEIPT
DOMESTIC MAIL ONLY

To: **Wilmington, DE 19801**

Combined Mail Fee: **\$3.75**

Postage: **\$2.16**

Total Postage and Fees: **\$8.96**

Date: **11/06/2021**

Postmark: **0939 03**

Sender: **Office of the Clerk U.S. Dist. Ct.
844 North King St Unit 15
Wilm., DE 19801-3570**

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

Exhibit 2

Fw: 1643532266; ROBERT KELLY

From: Meg Kelly (meghankellyesq@yahoo.com)
To: zi-xiang.shen@delaware.gov; ryan.costa@delaware.gov
Cc: meghankellyesq@yahoo.com
Date: Tuesday, November 2, 2021, 07:52 PM EDT

Good evening,

Good evening,

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

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

Very truly,
Meg

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

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

**34012 SHAWNEE DR
DAGSBORO DE 19939
UNITED STATES**

Thanks again for all of your help!

**glendon
asurion.com**

asurion

 **IMG_1906.JPG**
1.3MB

 **IMG_1907.JPG**

Exhibit 3

Your repair is still underway

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

To: meghankellyesq@yahoo.com

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

asurion



Repair in process.

Your repair is still in the works.

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



Service request (SR#): 1643532266

www.asurion.com

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Exhibit 4

Delaware Supreme Court LAWYER MANAGEMENT SYSTEM

Azure Sign Out

Home	Dashboard	Profile	Settings
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Request Status Change

DELAWARE SUPREME COURT APPLICATION FOR A CERTIFICATE OF INACTIVE STATUS

To the Supreme Court of Delaware:

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

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

Supreme Court ID 004968

SIGNATURE

/s/John Q. Public, Esq.)

(e.g.

Save Cancel

All technical questions regarding the DESCLMS system should be directed to the doeLegal helpdesk, by telephone, (302) 798-7500, or e-mail, helpdesk_descs@doelegal.com.

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

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

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

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

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

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

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Exhibit 5

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

Crimes and Associated Information

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

Witness Information

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

Investigative Narrative

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

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

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

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

Exhibit 6

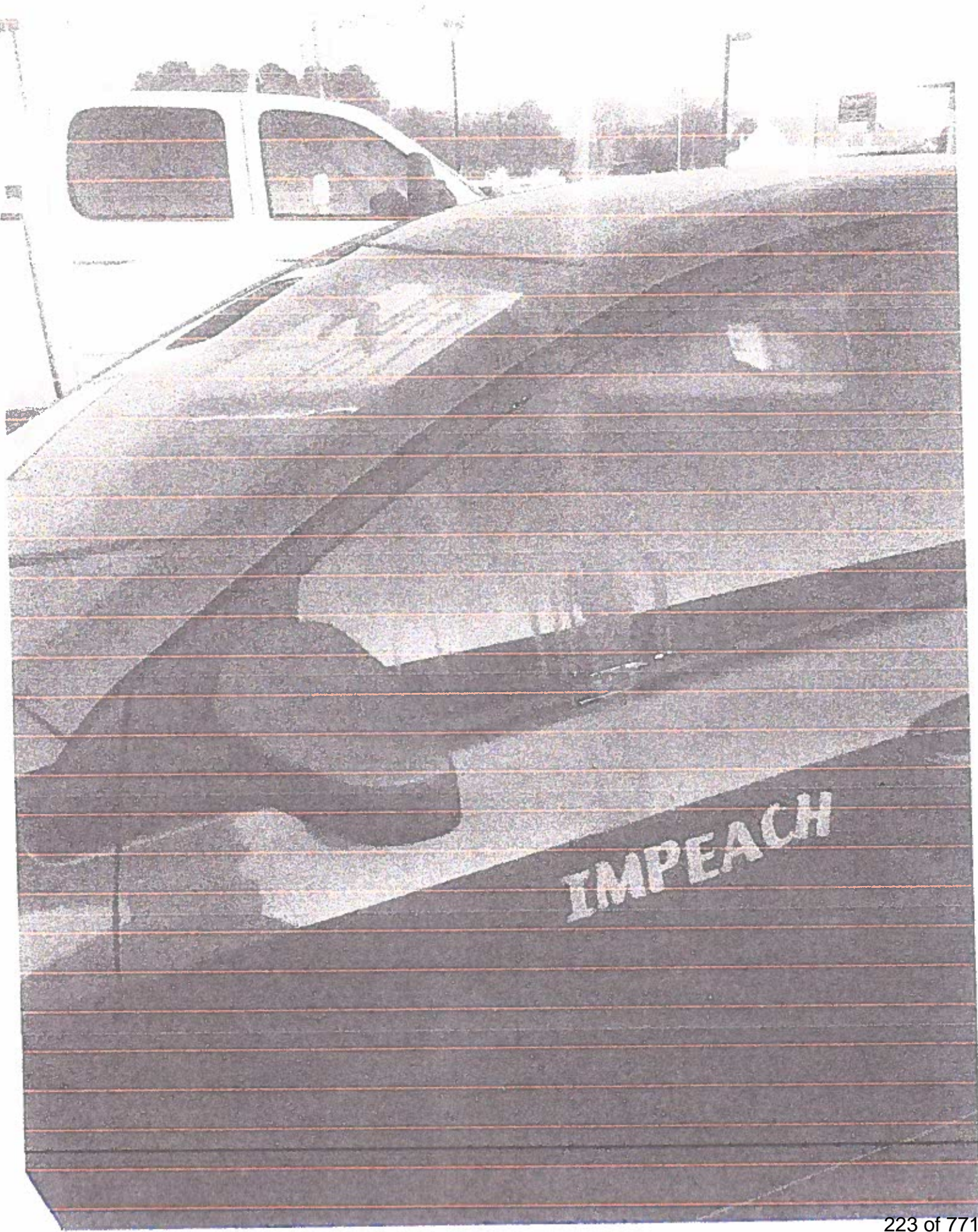


Exhibit 7

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Amended Motion for Reargument

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

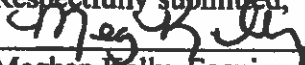
The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. My complaint intentionally refers to ideas to prevent an economic crash, prevent the elimination of social security, improve healthcare and other important issues beneficial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

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

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

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

Dated November 3rd 2021

Respectfully submitted,

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

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

Meghan Kelly (printed)

Meg Kelly (signed)

Exhibit 8

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Amended Motion for Reargument

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

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

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

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

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

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

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

had two bullets almost hit him and his wife as they sat at their kitchen table in their home for his exercise of First Amendment rights. D.I. 2, 3. I am scared Protection of my freedom of speech, religious exercise, association and right to petition, despite religious beliefs, poverty, unemployment, and profession is something I seek this Court to protect which is far greater than my active license to practice law, or all the money in the world, for freedom cannot be bought and sold, should the court fail to grant injunctions, with claims for nominal damages, potential additional relief as more harm arises, and damages. The Defendants and Court agents by their positions are not above the Constitutional law, immune to punish me for my exercise of a fundamental right requiring their need to meet strict scrutiny which it does not. I do not lose my right to seek relief in Court for their violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me. They knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts should they overstep. I did not sell my soul to hell for my license to practice law, nor did I become enslaved to the false God of money in exchange for my license to practice law. Any sacrifice of religious freedoms of conscience for the profit and control under the guise of order of the profession, even at the cost of human sacrifice of individual Constitutional liberties, is a sacrifice too great. I am protected under the Constitution for my religious beliefs, religious exercise, speech, petitions and association, even if I am in destitute utter poverty, an attorney, and even if Defendants find my religious associated beliefs, speech and petitions, which reflect my religious exercise and beliefs, repugnant or crazy. I am protected even if I made mistakes in court, in my desperate desire to serve Jesus by protecting God's holy name. Defendants are not immune for conduct they know or should have known as attorneys were Constitutional violations. Immunity is removed. *Werkheiser v. Peene Twp.*, 780 F.3d 172, 176 (3d Cir. 2015), I.D. 2 at 188, 194, 201-204, 236-239, 336,

My faith in God the father, Jesus, and the holy spirit are in issue in this case, my complaint *Kelly v. Trump* relating to a substantial burden upon my free exercise of religion, and are in issue, as the motive,

~~an improper motive for Defendants' case Board Case No. 115327 B per Defendants admission per the attached complaint marked as (Exhibit 1, at 7), and per my Complaint, motions and exhibits. (D.I. 1-12, 14) Defendants bring a wrongful proceeding against me because they find my religious beliefs in Jesus, "a serious concern regarding my mental capacity." Id. They allege they do not understand my beliefs in Jesus "are objectively illogical, and rely on non-legal sources, including the Bible." See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (2d Cir.) ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") My claims against Presidents Trump and Biden, and the Defendants' wrongful action against me relate to my pleadings in RFRA action Kelly v. Trump); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Presbyterian Church in U. S. v. Mary-Elisabeth Blue Hull Memorial Presbyterian Church*, 392 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934. See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (Exhibit 2). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2. My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

My faith in God the father, Jesus, and the holy spirit are in issue in this case, my complaint *Kelly v Trump* relating to a substantial burden upon my free exercise of religion, and are in issue, as the motive, an improper motive for Defendants' case Board Case No. 115327-B per Defendants admission per the attached complaint marked as (Exhibit 1, at 7), and per my Complaint, motions and exhibits, (D.I. 1-12, 14) Defendants bring a wrongful proceeding against

me because they find my religious beliefs in Jesus. “a serious concern regarding my mental capacity.” Id. They allege they do not understand my beliefs in Jesus “are objectively illogical; and rely on non-legal sources, including the Bible.” See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.) (“Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy.”); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. (“Courts have no business addressing whether sincerely held religious beliefs asserted in a RERA case are reasonable.”) (Defendants’ wrongful action against me relate to my pleadings in RERA action *Kelly v Trump*); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim.”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934. See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. (emphasis intended).

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

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

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

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

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

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

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

Dated November 2021

Respectfully submitted,

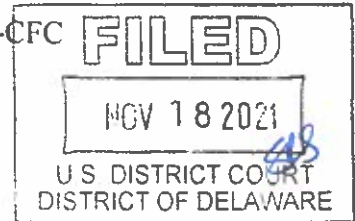
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,631-Count 541 Count)

APPENDIX G

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

No. 1:21-cv-01490-CFC



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

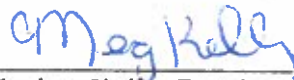
Attached please find Exhibit 3, the missing last page of Exhibit G.

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

Wherefore I respectfully pray this Court grants my motion.

Dated November 9, 2021

Respectfully submitted,

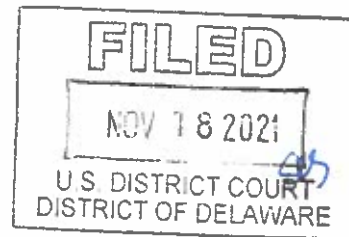


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word Count 1417)

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

Meghan Kelly (printed)

Meghan Kelly (signed)



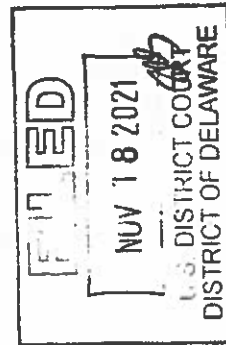
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Daguboro, DE 19937

Attn: Office of the Clerk

US District Court

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Wilmington, DE 19801-3577



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 SIGNATURE REQUIRED: The mailer must check the "Signature Required" box if the addressee: (1) receives the addressee's signature; OR (2) purchases additional insurance; OR (3) purchases COD (Collect on Delivery) or Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.
 No Saturday Delivery (delivered next business day)
 Sunday/Holiday Delivery Required (additional fee, where available)
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PHONE () _____

*Office of the clerk
 U.S. District Court, 544
 N. King St. Unit 15, DE 19501-3710*

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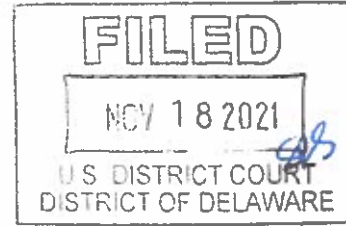
ORIGIN (POSTAL SERVICE USE ONLY)		Scheduled Delivery Date (MMDDYY)		Insurance Fee		COD Fee	
<input checked="" type="checkbox"/> 1-Day	<input type="checkbox"/> 2-Day	19939	11-10-21	\$	\$26.60	\$	
PO ZIP Code		Date Accepted (MMDDYY)	Scheduled Delivery Time			Return Receipt Fee	Live Annual Transportation Fee
		11-9-21	6:00 PM			\$	\$
Time Accepted	<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM						
1:05 PM							
Special Handling/Fragile		Sunday/Holiday Premium Fee		Total Postage & Fees			
\$		\$		\$26.60			
Weight	Rate	Acceptance Employee Initials					
oz.		AZ					
DELIVERY (POSTAL SERVICE USE ONLY)		Delivery Attempt (MMDDYY) Time		Employee Signature			
<input type="checkbox"/> AM <input type="checkbox"/> PM							
DELIVERY (POSTAL SERVICE USE ONLY)		Delivery Attempt (MMDDYY) Time		Employee Signature			
<input type="checkbox"/> AM <input type="checkbox"/> PM							

LABEL 11-B, MAY 2021

PSN 7890-02-000-9996

FILED
 NOV 18 2021
 U.S. DISTRICT COURT
 DISTRICT OF DELAWARE

Exhibit 1



WIKIPEDIA

I think he maybe my dad's 2nd cousin?
I think William Bee worked at the same place which is weird

Michael J. Kelly

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

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

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

Contents

- Early life and education**
- Career**
 - Time Inc. and American Town Network (1980-2002)
 - Time Warner and AOL (2002-07)
 - The Weather Channel (2009-12)
 - Other work
- Personal life**
- References**
- External links**

Early life and education

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

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

Career

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

Exhibit 2

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

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

No. 83-732
January 9, 1984

Synopsis

Case below, 709 F.2d 684.

Opinion

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

All Citations

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

End of

Document

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Current Date: 9/8/2020

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

CASE INFORMATION

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

PARTICIPANT INFORMATION *Expand All*

YVONNE G. TROUTT *Toggle Section*

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

He had a place at Sea Colony in Bethany
I miss talking and visiting with him on his trips here where I live.

Exhibit 3

1313 N Market Street
Wilmington, DE 19801

*M.K.
M.K.*

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


Very truly,

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

Exhibit 4

APPENDIX G

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

July 12, 2021

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

Dear Honorable Justices of the Delaware Supreme Court:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you.

Dated: July 12, 2021

Respectfully submitted,

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

Exhibits to Appendix G

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

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

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



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

October 12, 2020

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

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

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

Dear Honorable Clerk of Court:

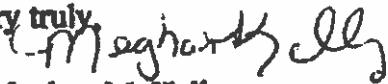
Plaintiff, Meghan Kelly, has filed with this Honorable Court, on behalf of herself, Pro Se, a Second Amended Complaint against Defendant.

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

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

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

Very truly,



/s/Meghan M. Kelly

Meghan Kelly, Esquire

Pro Se

DE Bar Number 4968

34012 Shawnee Drive

Dagsboro, DE 19939

(Word Count 199)

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



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

October 12, 2020

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

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

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

Attorney General Barr Praecipe

Dear Honorable Clerk of Court:

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

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

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

~~1313 N Market Street
Wilmington, DE 19801~~

*M.K.
M.K.*

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

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

Appendix H

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1/10/22

Respectfully submitted,



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Appendix I

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

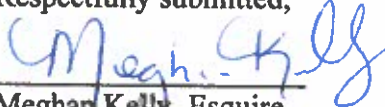
32. The government runs on individual free choice, the collective free choice of the many who agree to respect the Constitutional laws' protections of all people regardless of race, religion, poverty, gender, age or place of association. When individuals within government no longer respect the Constitutional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

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

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

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

1/18/22

Respectfully submitted,

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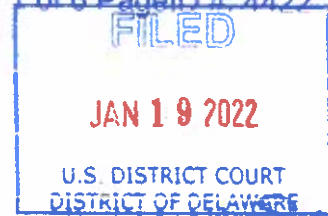


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EXHIBIT 1ST A, Letter of investigation by arm of state court, dated May 24, 2021

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

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

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

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

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

Exhibit A excluded since it is a District Court Doc.

Exhibit B includes internal exhibits, in one saved document

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit F Answer to petition, excluding exhibits.

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

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

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

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

Exhibit C Emails to and from Patricia regarding moot motion

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

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

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

Exhibit 1st A

After Judge Clark's interrogation

Lawyers Assistance Program

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

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

MAY 24, 2021

CONFIDENTIAL

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

Dear Meghan:

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

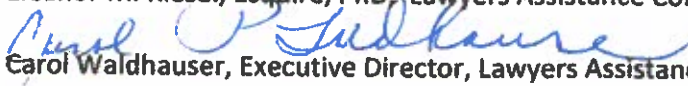
The Delaware Lawyers Assistance Program, The SOLACE Committee, The Delaware Lawyers Assistance Fund and the Professional Guidance Committee all provide support to attorneys who may need resources for basic needs, as well as referral options as needed or required. Again, these services are free and confidential.

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

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

Very truly yours,


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


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

Electronically forwarded with encls: meghankellyesq@yahoo.com

SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org)
To: meghankellyesq@yahoo.com
Cc: emkiesel@aol.com
Date: Monday, May 24, 2021, 11:58 AM EDT

Meghan:

Please find attached a self-explanatory letter.

Please contact us within the next 10 days regarding it.

Thank you.

Carol

Carol P. Waldhauser, Executive Director
The Delaware Lawyers Assistance Program
(DE-LAP)
405 N. King Street, Suite 100B
Wilmington, DE 19801
(302) 777-0124
Cell: (410) 409-8874
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DE-LAP is a Confidential, Free, Non-Judgmental Service Just for Delaware Lawyers and Judges

CHECK IT OUT ON YOUR PHONE, TABLET OR COMPUTER, DE-LAP'S NEW WEBSITE AT SAME ADDRESS: WWW.DE-LAP.ORG

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

Threat 10 days



Exhibit A

47 percent of Americans unemployed by design BD 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)
To: patricia.schwartz@delaware.gov
Cc: lisa.dolph@delaware.gov; karlis.johnson@delaware.gov
Date: Wednesday, January 5, 2022, 12:58 PM EST

Hi Patricia,

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

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

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

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

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

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

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

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

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

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

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

I hope you have a good day.

Very truly,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939
meghankellyesq@yahoo.com
4968

Exhibit B

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Administrative assistant to the Board on Professional Responsibility

405 N. King Street, Suite 505

Wilmington, DE 19801

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

December 18, 2021

Dear Board members:

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

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

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

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

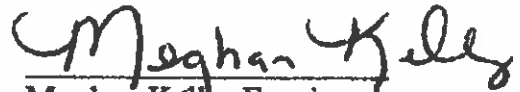
I respectfully request we post pone scheduling hearing until:

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

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

Thank you for your kind consideration.

Very truly,



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

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

Dated: December 18, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

EXHIBIT 1

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of the Supreme Court

55 The Green

Dover, DE 19901

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

November 22, 2021

Dear Clerk:

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

Thank you.

Very truly,

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

No Phone

meghankellyesq@yahoo.com

Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

Appendix J

U.S. DISTRICT COURT, DISTRICT OF DELAWARE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

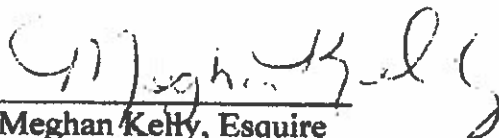
37. On January 18, 2022, I filed a different motion with the Court, the Court is scheduled to receive today with information that I include and incorporate herein by reference in its totality.

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

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

Dated Jan. 19th, 2022

Respectfully submitted,



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

Appendix K

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

The Honorable Colm F. Connolly

Care of the Clerk of Court

Office of the Clerk

United States District Court

844 North King St Unit 18

Wilmington, DE 19801-3570

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

April 26, 2022

Dear Honorable Colm F. Connolly:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Delaware Rules of Disciplinary Procedure, Rule 13 requires:

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

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

Delaware Rules of Disciplinary procedure Rule 14 provides:

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

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

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

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

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

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

I am also mailing you and Defendants electronic copies

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused oppression and injustice per Jesus the Christ's teachings in *Matthew 6:1-4*. I sinned and I am sorry your honor.
2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.
3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.
4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

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

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

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

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

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

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

April 26, 2022

Very truly,



/s/Meghan Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Bar Number 4968
(4,039 Words)

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

Dated: April 26, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

2e MK

Table of Exhibits for Letter

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

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

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

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

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

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

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

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

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

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

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

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

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

Exhibit N My pleading before arbitrator, Defendant David White.

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

Electronic Data

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

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

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people should vote on their ideas not appearance. Jesus teaches us judge correctly, not based on appearance. The title marketing appears naughty to me, your honor.

Exhibit A

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



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

October 5, 2020

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

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

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

Dear Honorable Court:

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


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

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

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

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

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

Very truly,

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

*10/15/2020 Meghan Kelly Esq. Said to file this
letter of instructions + RTR not to drop Summons.*



Exhibit B

MEGHAN MARIE KELLY, ESQUIRE

**34012 Shawnee Drive
Dagsboro, DE 19939**

July 12, 2021

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

Dear Honorable Justices of the Delaware Supreme Court:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you.

Dated: July 12, 2021

Respectfully submitted,

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

Appendix L

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

December 4th, 2021

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

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

Dear Honorable Chief Justice Colm F. Connelly,

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

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

Dated December 4th, 2021

Respectfully submitted,

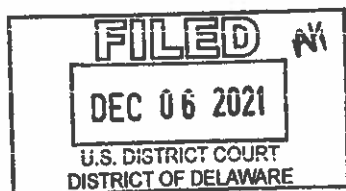


Meghan Kelly, Esquire
Pro Se, Bar # 4968
34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968

meghankellyesq@yahoo.com

No phone

(Word Count 143)



Appendix M

Appendix M

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

21. I am utterly poor. A stay is required to prevent a substantial burden and obstacle to my access to the Courts, and compelled violation of my religious belief against debt, in contravention to my First Amendment right to access to the Courts applicable to the State via the 14th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.") *Citing, e.g., Pryor v. Brennan*, 914 F.2d 921, 923 (7th Cir. 1990); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.")

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

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

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

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” Douglas, 372 U.S., at 357-358

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

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

26. The Delaware Disciplinary proceeding and determination against me creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work at a law firm. The State of Delaware's conduct harms my reputation to make me less attractive to other employers by harming my prospects of employment by the libelous published accusations against me. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness is protected.

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

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

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

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

II. Legal Authority to grant a stay

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

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

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

32. Justice requires a stay in my case.

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

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

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

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

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

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

III. Factor 1, Interest of the Court

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

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

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

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

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

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

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

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

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

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

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

46. The Record also evidences the State's violations of my opportunity to be heard on ignored motions. The state ignored my motions to perform discovery, opportunity to prepare and present my case, opportunity to call and cross examine witnesses in the sham proceeding brought to cover up state Court misconduct and to punish me for the exercise of my First Amendment rights.

47. The State Court also criticized me for noting outside circumstances as evidence of disability in its August 10, 2022 Order, while finding those circumstances, including, but not limited to vulture attacks against me and my property, to be legitimate reasons for granting an extension of time. (DI 77 Internal-Exhibit D incorporated herein by reference)

48. Despite having good cause to contest this reciprocal proceeding. I lack time and resources to appeal the original DE disciplinary proceeding, and the civil rights case. I am unemployed, unable to seek to return to my former law firm. I am left impoverished. My parents indicated they are not able to help me as much as they would like, during this economic down turn. My parents indicated they are actually disappointed with me. They would like me to contribute more. They have indicated they intend to cut off my inheritance. I love my parents more than money, but I love God more and have to stand up for my faith in Jesus without government persecution. Then others even future generations may no longer be free from government compelled belief should I not have courage now.

49. In the interest of justice, this court must not sacrifice my meaningful opportunity to be heard in all cases, by denying a stay. This court must preserve the right for my meaningful opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

50. I plead with this court to grant a stay to grant me time to argue legal justification to overturn the original Delaware Order on appeal, albeit the procedural defects still permit me to argue the order is voidable before the District Court.

V. Factor 5, Prejudice against me is Great

51. The prejudice against me should a stay be denied is great in the form of substantial burden upon my access to the courts, additional loss of my fundamental rights and licenses. I also face the risk of other hardships, related to the loss of the opportunity to work at my former law firm, or any law firm to earn a living in my profession.

52. I have good cause to contest the decision the Delaware Supreme Court made in placing me on disabled inactive. but for the exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and to make religious-political petitions. Yet I am impoverished. I lack time and resources to fight both the appeal and the civil

rights case and other potential reciprocal cases simultaneously. I will face irreparable injury if a stay is not granted. *Hilton v. Braunskill*, 481 U.S. 770 (1987).

53. The balance of the equities require a stay be granted.

VI. A stay is required because I asked for money damages, equitable relief and nominal damages like voiding Kelly v Trump not available in the state Forum

54. Additionally, a stay is required since I requested relief not afforded in the state forum, including but not limited to monetary relief and relief under 42 USC § 1985 for the Defendants' interference in Kelly v Trump, not merely relief relating to In the Matter of Meghan Kelly Case No 22-58. DI 2-4, 20-21,34-43, 50-58, I incorporate herein by reference in its entirety.

55. I sought claims for emotional distress, First Amendment violations, loss of employment opportunities, or other economic harm, and harm to my reputation. (DI 2-4).

56. I also sought claims for Defendants' selective prosecution in bringing a disciplinary action against me to demean my reputation by placing me on inactive disabled to conceal Defendants misconduct in collusion with the Delaware Supreme Court, and to punish me for exercising the right to access the courts and

First Amendment rights, based on Defendants disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. Id.

57. I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from Kelly v Trump. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and Kelly v Trump due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85)

58. I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law

library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from *Kelly v Trump*. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and *Kelly v Trump* due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85).

59. In *Deakins v. Monaghan*, the Supreme Court held only that “the District Court has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”¹ “Federal district court must stay rather

¹ Citing, *Deakins v. Monaghan*, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988) “In reversing the District Court’s dismissal of the claims for damages and attorney’s fees, the Court of Appeals applied the Third Circuit rule that requires a District Court to stay rather than dismiss claims that are not cognizable in the parallel state proceeding.”); See also, *Brindley v. McCullen*, 61 F.3d 507 (6th Cir. 1995); See also *Quackenbush v. Allstate Ins. Co.*, 517 U.S. 706, 719 (1996) (“we have applied abstention principles to actions ‘at law’ only to permit a federal court to enter a stay order that postpones adjudication of the dispute, not to dismiss the federal suit altogether.”); *Lewis v. Beddingfield*, 20 F.3d 123, 124 (5th Cir. 1994). (It was proper to stay rather than dismiss the federal suit because the damages could not be claimed in the criminal prosecution.); *Jones v. Prescott*, 702 Fed. Appx. 205, 209 (5th Cir. 2017) (Younger abstention does not apply to federal suits seeking only money damages) (citing *Alexander v. Ieyoub*, 62 F.3d 709, 713 (5th Cir. 1993)); See also, *Boyd v. Farrin*, 575 Fed. Appx. 517 (5th Cir. 2014); **Third Circuit:** *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), aff’d, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (A court “has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”); *Abbott v. Mette*, No. CV 20-131-RGA, 2021 WL 327375, at *3 (D. Del. Jan. 31, 2021), report and recommendation adopted, No. 20-CV-131-RGA, 2021 WL 1168958 (D. Del. Mar. 26, 2021), aff’d, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (“As a general matter, assuming that a federal court has jurisdiction over a case, the federal court’s “obligation to hear and decide [the] case is virtually unflagging.” *Sprint Commc’ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013) (internal quotation marks and citation omitted); *Crane v. Fauver*, 762 F.2d 325 (3d Cir. 1985) (“District court should have retained jurisdiction over correctional

than dismiss claims that are not cognizable in parallel state proceeding.” *Deakins v. Monaghan*, 484 U.S. 193, 202, 108 S. Ct. 523, 529–30, 98 L. Ed. 2d 529 (1988)

60. I made it clear to the District Court, I pled defamation, Constitutional injury and emotional distress, by pleading damages, albeit unartfully in my original

officers' civil rights action arising out of their discharge, even if it properly declined to exercise jurisdiction over federal claims, and stayed action pending outcome of related state proceeding where officers were relegated for prudential reasons to state proceeding which could only afford them dismissal of charges and back pay, with attorney fees only to extent that back pay award was reduced by interim earnings, but officers sought constitutional damages and attorney fees, and new complaint upon termination of state proceedings may have been time-barred.”); *Williams v. Hepting*, 844 F.2d 138, 145 (3d Cir. 1988) (The Third Circuit held, “Accordingly, we hold that the district court should have stayed instead of dismissed without prejudice Williams' failure-to-investigate and suggestive pretrial identification claims. Because these particular federal court claims for damages seek relief that is unavailable in Williams' ongoing state proceedings, the allegations should be stayed pending the outcome of his state court appeal on the underlying conviction.”); *Nimer v. Lichfield Twp. Bd. of Trustees*, 707 F.3d 699 (6th Cir. 2013) (*Younger* abstention applies to § 1983 damages claims, but district court must stay rather than dismiss federal suit; in other words district court has no discretion to dismiss federal suit); *Carroll v. City of Mount Clemens*, 139 F.3d 1072 (6th Cir. 1998) (when federal suit seeks damages and *Younger* is invoked, federal suit should be stayed, not dismissed; this likely will be a formality, given probable preclusive effect of state court decision); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022) (“ Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021) (Court “stayed until the conclusion of the state disciplinary proceedings, rather than be dismissed.”), *citing*, *Kalniz*, 699 F. Supp. 2d at 975 (explaining that where a plaintiff is bringing constitutional civil rights claims in a federal court case in which *Younger* abstention was proper, the stay protects against the possibility that the statute of limitations could deprive the plaintiff of the opportunity to present the merits of her damages claims); see also *Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001) (and cases cited therein); *Yamaha Motor Corp. v. Stroud*, 179 F.3d 598 (8th Cir. 1999) (when damages are sought in § 1983 action subject to *Younger* abstention, and damages are not available in pending state proceeding, federal action should be stayed, not dismissed); *Night Clubs, Inc. v. City of Fort Smith*, 163 F.3d 475 (8th Cir. 1998) (when § 1983 complaint seeking damages is subject to *Younger* abstention, federal action should be stayed rather than dismissed).

Complaint. (DI 2, 34-35). In addition, I showed my intent to seek nominal damages, damages, and equitable relief too. (D.I. 43, 58, 69-75, 77-79).

61. My claims for damages and other equitable relief were unavailable in state court.

62. A court must stay claims for monetary relief that cannot be redressed in the state proceeding, and may not dismiss the case. *Citing, Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), *aff'd*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021); *See, Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *1 (S.D. Ohio Mar. 7, 2022).

63. Staying this action is required. *See, Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022); (“Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”).

64. Additionally, to avoid the appearance of partiality, I must be afforded to appeal the Third Circuit’s disciplinary order where Justice Alito indicated the Third Circuit is a Defendant.

65. I am tired please safeguard my opportunity to petition the courts in defense of my life, liberty, license, and eternal life. It is the opportunity to be heard pursuant to the Fifth Amendment applicable to the Federal Courts I seek to protect, not the guarantee of justice.

66. Human judges are special in that they are more powerful than Congress or the President in that they may lay down selfish desires and the desires of men or the masses to do what is right, by love. They are special in that they may reflect the image of God by love unconditionally, even for those they disagree with or whose ideas they may think are bad or repugnant like mine.

67. Are human judges perfect? No. It is the mere opportunity to petition them without foreclosure based on religious-political beliefs or poverty which must be protected in order not to violate the 5th Amendment Equal Protections component as applied to me as a party of one. I am impoverished, with unique religious-political beliefs. If I am not free to petition, than others may no longer be free in future generations.

68. Opposing Counsel did not state her position on this motion I alerted her and this Court on. 3DI 103.

Wherefore, I pray this court grants this motion.

January 4, 2023,

Respectfully submitted,

Appendix N

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

Appellant Meghan Kelly’s Motion for additional time to file a brief in reply to Defendant’s Answer in the amount of 45 days

Appellant Plaintiff, Meghan Kelly, pursuant to Fed. R. App. P. 26 (b), for good cause, respectfully requests additional time to file a brief in the amount of 45 days, given additional exigent factors.

1. I previously asked opposing counsel her stance a while ago. She did not respond.

2. Fed. R. App. P. 26 provides, “For good cause, the court may extend the time prescribed by these rules or by its order to perform any act, or may permit an act to be done after that time expires. ”

3. I incorporate Third Circuit Docket Item (“3DI”) incorporated herein by reference in their entirety 3DI-122, 3DI-123, 3DI-124.

4. Sustaining my health and life is good cause to extend the time, with little prejudice to opposing counsel and great prejudice to me in terms of loss of First Amendment rights, health and threat to life due to severe dehydration and requirement of rest, exercise and rehydration.

5. I apprised the District Court of my limitations relating to a surgery I had when I was a teenager on October 25, 2022. District Court Docket Item (“DI”) DI 4, Exhibit 43.

6. I apprised the Chancery Court, the PA Supreme Court, Delaware Board of Professional Conduct and Delaware Supreme Court by filing the same documents in their courts, though they did not appear to desire be inconvenienced to sustain my life or health. DI 2-3, DI 69-75, DI 77.

7. The Delaware Supreme Court required I attend a hearing without adequate time to prepare with fewer than 2 weeks after the Court rendered an Order permitting me to self-represent. DI 34-43, 58, DI 69-74, DI 77. Fewer than two weeks is an insufficient amount of time in light of my previous unaddressed motions to the Board and the Delaware Supreme Court. *Id.* My motions for additional time to perform discovery, to call specific named witnesses, research and prepare were ignored. The court ignored my motions submitted previously and subsequently. The Board extended the hearing 8 additional days for a reason I did not submit while ignoring my asserted reasons contained in the motions. I required time in order not to prejudice me by denying me meaningful opportunity to be heard in defense of my exercise of fundamental rights. US Amend I, XIV. I

objected to the notice as not adhering to the rules, previously and subsequently. The Court required I attend, as I was recovering from what I believe was the shingles. The Defendants cared very little about my health. I incorporate herein by reference in its entirety. Id. The District Court knew I was ill, but callously refrained from preventing possible irreparable injury to me in the form of the loss of my fundamental rights, my property interest in my license, reputation and health. DI 40.

8. I require inordinate amount of water, time, exercise, and rest to sustain my health. I lose five pounds of water weight and become dangerously dehydrated for a week and sometimes longer, each month. Id.

9. Please see DI 97-1 for an example of when I collapsed due to severe dehydration at the post office. The law suits relating to the DE order have impeded time needed to rest, and care for my health. The cumulative impact of not rehydrating has left me dangerously dehydrated for months, not a mere week a month. I do not feel well. I require time to sustain my health please.

10. I assert my right to live under the First Amendment as an exercise of religious belief. I have religious objections against healthcare and mental healthcare.

11. The US Supreme Court held that one has a right to refuse healthcare and that “right presupposes no abandonment of the desire for life.” *Cruzan ex rel. Cruzan v. Director, Missouri Department of Health*, 497 U.S. 261, 343 (1990).

12. My religious beliefs are individual and do not conform to the dictates of entities, but seek to be led by the dictates of God. I do not force my will upon others, nor do I hide my beliefs. I keep myself separate, and holy by not sinning even though the world praises evil as good, and good as evil. I am permitted to exercise religious belief differently than the world. I have religious objections to healthcare and mental healthcare. I believe people go to hell for adopting the beliefs, theories and philosophies of many experts such as B F Skinner, Plato and others. Not knowing, confusion, misunderstanding, being duped or deceived by trusting in man who misleads in place of God does not remove harm or potential damnation in hell.

13. I believe the Bible teaches people go to hell for their unconcern, indifference, or the fact they were too busy caring for their own to love God or others. *See Ezekiel 9,16:49-50, Matthew 13, 2 and Corinthians 4:4.*

14. I believe people go to hell for dumbness and blindness, not knowing, for trusting in their training, doing what they are told to do instead of using their own brain, to care to know, in order to do what is right. I

believe Courts can shed light on those in the dark preventing harm and hell.

Amos 5:15, Matthew 23:23.

15. I believe many people go to hell for trusting in doctors, mere businessmen, under the guise of expertise, or science or dumbed down standardized training where they are penalized for thinking outside the box of standards to care for unique patients with individual needs.

16. I believe leaders in government who teach us to trust in experts, make business greed, the mark of children of the devil and lawlessness the law if trust in business professionals remains unrestrained by the courts. I believe such government teachings make entities and businesses above the law sacrificing people and individual liberty to serve money and material gain. Human sacrifice under the guise of common good is deceit built on a lie that sacrificing other people is necessary to care for our own.

17. I believe most of our law makers are misguided to harm others on their on way to destruction in hell for teaching the lie we must compromise serving some in order to serve others when the way money is coined creates artificial scarcity to exploit as opposed to serve the people. It is possible to serve the people without sacrificing some of the people for the benefit of others. This lie human sacrifice is needed is from Satan not God. (*Hebrews 2:14*). I wish this Court would save souls of presidents and law

makers from hell by taming their lusts with the Constitutional rule of law.

See, Isaiah 10:1-3.

18. I believe people will be thrown into the fires of hell for having the evil eye by looking at people for what they can contribute, as if humans are products. *See Matthew* 6:23 regarding if your eye is evil. I believe individuals in government are charged to serve and respect the people, not exploit them for material gain.

19. I believe business greed is the mark of the twice dead, those without eternal life. Those who sacrifice and oppress people to get as much as they can for as little as they can do not reflect human nature. They reflect the image of the beast, the devil, those without eternal life, without repentance.

20. Attached, please find my complaint against President Trump where I declare my religious belief that business greed reflects the mark of lawlessness misleading people to hell. DI 4, Exhibit A of F. The mark of lawlessness should not be the law by making experts and professional standards the letter of the law. Judges should judge, not businesses. Courts will not ever stop business practices that kill, steal and destroy human life and liberty for the bottom line if we they deem businesses through their bought paid professionals the letter of the law. There is evidence herbicides

and insecticides cause cancer. Yet the laws encourage or allow entities to profiteer off of their use, even by creating entities for cancer cures which rewards and profiteers off of sickness and death. I believe people go to hell for organized charity and fundraising which is not true charity per Jesus Christ. (*Matthew* 6:1-4, See DI 4, I incorporate exhibit 2, law suit against Democrats to run for office without violating my religious belief by fundraising or collecting of signature, exhibit 50, proof I sought to run for president without violating my religious beliefs, Exhibit 51 proof I sought to run for local office without violating my religious belief by encouraging volunteers, fundraising or other violations of Jesus Christ's teachings, I incorporate herein by reference in all of the exhibits entirety. *Matthew* 6:1-4.)

24. True charity is done in secret at a material loss for an eternal gain. True charity is not conditioned on societal conditional entities or conditional collective acts. True charity is based on an individual free, not collective conditional choice. It is not unconditional love if it is through a conditional entity such as a beneficial-corporation.

25. It is my religious belief that I am required to use my own brain to care for my body. My body is not a professions or the governments' property to service by doctors who exploit it for money. See, the excellent,

brilliant, thought-provoking dissent in *Meachum v. Fano*, 427 U.S. 215, 230 (1976).

26. I believe our healthcare is so bad. When I ran for office, I proposed changes to the law to improve our healthcare. Coastal Point printed my proposals in the local newspaper in Sussex County, Delaware. (See DI 4, Exhibit 43, I incorporate herein in its entirety and attach hereto.)

27. I believe that people go to hell for harming others despite doing what they were trained to do, what their employer requires should they not use their brain to care to know about possible harm in order to love those they do business with, blinded by their love of money to care for their own, should they not repent. Ignorance is guilt to God. *Hosea* 4:6. I believe courts can help people know. So, they are not damned to hell as they harm others on their way there through their unconcern, indifference or ignorance. Truth through the courts may save eternal lives.

28. I believe our healthcare harms, kills and misleads people to hell. I believe our healthcare would improve if judges judged the doctors, scientists and businessmen instead of allowing business, charities and entities to be above the law by deeming their professional standards to be the letter of the law.

29. Businesses are left unrestrained by love written on human hearts not entities or the rule of law from potentially oppressing, killing, stealing and destroying life, liberty and health should business's judgment through alleged experts replace independent critically thinking individual judges on the bench that may analyze each individual unique set of facts before it. (See *Jeremiah* 31:33 "I will put My law in their minds and inscribe it on their hearts."); *Ephesians* 6:12; "For our struggle is not against flesh and blood, but against the rulers, against the authorities [businesses, charities, not for profits, beneficial corporations...], against the powers of this dark world and against the spiritual forces of evil in the heavenly realms.").

30. People judges are special, not replaceable by standardized automation. Sameness, equal treatment, is not fairness. Equal treatment is not equal protection under the law, which protects people's decision to exercise beliefs differently. It is elimination and sacrifice of individual liberty to believe and exercise beliefs differently under the satanic desire for order and convenience to compel the conformed model of boxed in standards. (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 faith commands me to be un-conformed to the world. (See, *Romans* 12:2 "Do not

conform to the pattern of this world, but be transformed by the renewing of your mind. Then you will be able to test and approve what God's will is—his good, pleasing and perfect will.”).

31. People judges are needed to protect our liberty. Two branches give us a republic in the form of representation. The judicial branch gives us a democracy in our Democratic-republic. The Judicial branch prevents the other two branches from sacrificing individuals and individual liberty under the guise of the vote's authority to administer the mob's reign of lusts which exceed Constitutional limits. It is the Courts who give us freedom. The other two branches allege to give us representation, but merely give the majority representation.

32. I am a child of God. I associate as a Christian and Catholic, but I put my faith in God the father, son and holy spirit, not in the entity of the church or mere men.

33. I attend St. Anne's Catholic Church, located at Bethany Beach, DE. I have refrained from attending regularly because people are getting sick and dying during this plague of global infections.

34. I actually left mass early on January 1, 2023 because people were coughing without covering their mouths. I do not feel guilty. God

understands. I think is gross and dangerous when people cough without covering their mouths.

35. My health issues arose during church service at St Anne's when I was in high school. During mass at St. Anne's, I could not stand in the church's bathroom. I collapsed to the floor. I did not know that my blood was being cut off by a cyst. DI. 4, Exhibit 43.

36. Later in high school, I had emergency surgery the day after Halloween. They took my ovary for research.

37. I believe people sin by using body parts including my removed ovary or other people as research statistics for material gain, but my parents gave consent.

38. I became weak. I am weak. I continued and still continue to have menstruation each month, despite only having one ovary. Yet, I require rest, exercise, food and inordinate amounts of water in order not to collapse, harm my health or die.

39. I have the ability to run ten miles. Yet, despite appearance and athletic agility, I have limitations and needs that ordinary people do not require to sustain their health or life. Many people have the sin against the holy spirit by not desiring to be inconvenienced by my needs to sustain life and health. I have had to assert my right to live and sustain my precious

body. My body is God's not man's to exploit dead or alive. Citing, 1
Corinthians 6:20. ¹

40. While I plea this Court grant me time to uphold my right of life and time to sustain my health on religious grounds. I assert my right to exercise religious belief by living and sustaining health. I pray this Court deems other citizens as the treasure to serve not exploit for money and material gain, "moth and rust." (*Citing* Jesus, *Matthew* 6:19-20.)

¹ In *Renihan v. Wright*, 125 Ind. 536, 537 (Ind. 1890), the Court found dead bodies to be property. Is property more valuable to protect than First Amendment right to religious belief or a person's body? I believe people sin for cremating other people, leading to damnation in hell for hurting other people's bodies. *See Amos* 2:1. Dead or alive they are God's for resurrection the last day for judgment. *Citing, Romans* 14:8, *Ezekiel* 37. Burial is an important exercise of my religious belief. *See, eg. Genesis* 47:29. I think non-religious people's lives and bodies should also be afforded dignity and respect with the right to live, not merely me because it is a religious exercise of my faith in Jesus. I am called to love and respect those beyond my own even my enemies too. Love does not kill or harm. Should the Court extend the right to life, bodily integrity in death, and liberty beyond religious exercise to safeguard humans as inherently deserving of respect and life unearned required, the Courts would create a fairer more just society. *See, Meachum v. Fano*, 427 U.S. 215, 230 n.1 (1976) "No State shall . . . deprive any person of life, liberty, or property, without due process of law . . ." U.S. Const., Amdt. 14, § 1). There is no due process for the dead, though I believe their bones need to be resurrected on the last day for judgment of eternal life or damnation loss of eternal life. Humans, dead or alive are not property. My heart is sad. People are priceless, not price tags. They are precious and are not stakeholder slaves to be bought or sold under the global plans either. The entire world is in danger. We need the Court to be our hero, not auctioneer. Justice is not a business or a matter of barter or exchange. Justice is a matter of determining truth under the facts protecting what is right by law, not lusts.

41. I request this Court grant an accommodation by additional time.

42. Please do not sacrifice my life and health in the name of mere business or productivity. I believe sacrificing people in the name of productivity, money or material gain is satanic human sacrifice, injustice guaranteed. *Hebrews 2:14*.

43. I am concerned by the numerous historical religions or cultures that required human sacrifice for material gain, essentially selling other people's souls to gain the world to lose their own soul in hell. (*Citing, Matthew 16:26*). I am especially concerned about the law suit by Jewish women under the RFRA in Indiana where they argue killing potential life is deemed a religious exercise. This may open a can of warms for other religions to kill life. The Court should deem the right to life a liberty to protect regardless of religious beliefs. The line of rights should be limited as not to eliminate the rights of others, including the right to life. This limit makes us all freer, not for sale property of entities or governments.

44. I have good cause for an extension due to limited access to resources and due to additional reciprocating Courts foreseeably requiring inordinate amounts of time, as to deny me meaningful opportunity to prepare and draft a Reply Brief before this Court within the time frame.

45. I apprised this Court of connectivity internet issues, printer issues and my need for computer replacement or repairs. 3DI-119.

46. I also had filing issues with the Eastern District of PA. I incorporate by reference in its entirety DI-97, which required attention and time. This prejudiced my ability to research and work on this matter.

47. I also had filing issues with the Delaware District Court. It is important to have an accurate record since this Court kindly permits me to base my pleadings on the record per Third Circuit Order at 3DI 24. See one example I incorporate herein by its entirety by reference DI-98. This prejudiced my ability to research and work on this matter.

48. To date, I still do not have electronic filing privileges despite an order granting them by the DE District Court. DI 106-109. I think I may calculate the time place on electronically filed documents by looking at the docket item number to see if and when any changes may have been made should the Court have addressed my other concerns relating to denial of opportunity to be heard by making pleadings illegible including DI-7 Filed 10/25/21 Page 1 of 17 **PageID #: 2522**. If you look at the emphasized page numbers they appear to be filed chronologically by date.

49. I also apprised this Court and the Delaware District Court of time constraints due to a reciprocal law suit in the Supreme Court of

Pennsylvania. The Court and opposing counsel are giving me a particularly difficult time, despite the fact I have been retired from PA since 2018, and I argue the Court is without subject matter jurisdiction. I incorporate by reference in its entirety 3DI 122-124 and DI 100-to DI 109. I do not know if DI 108-DI 109 are quite uploaded yet.

50. I have shown good cause for an extension of time.

51. I have the threat of loss of my right to believe differently than the world and to privately exercise my beliefs without government incited economic, physical or social persecution.

52. People threw substance on my vehicle based on my perceived religious-political beliefs. (DI 3)

53. People talked about shooting me, per the attached Facebook post refreshing my recollection. (DI 100 Exhibit I). I should be permitted to exercise my First Amendment fundamental right to privately not professionally petition in defense of a substantial government burden without reprisal or government rebuke and persecution.

54. I require time to appeal two orders to the United States Supreme Court. One Order is due January 27, 2022. The other appeal is due the following week. I must be permitted to plea to believe and exercise belief and my right to access to the courts, even if the entire world thinks my

beliefs are repugnant. It is the mere opportunity of justice, not the guarantee I seek. Please protect my meaningful access to other courts.

55. 45 days, would give me a week or so to draft something before your court after I file documents with the US Supreme Court.

56. It is difficult since I disagree with the US Supreme Court on many cases. I believe there is plan to eliminate religious liberties and the US Supreme Court's members are deceived into believing the lie business is freedom by allowing the government to partner with churches to perform government business through grants or business. So, the Court is contributing to the eventual schemed demise of free exercise of religion to forced by government backing or bought and sold religious exercise.

57. I know my church the Catholic Church has misled people to hell in history for material gain, business. For instance, the crusades violated Jesus's teachings to love your enemy, and God's teachings to feed them when they are hungry, not accept material gain to kill them. I believe the deceived people will perish in hell, which makes me sad.

58. My church also misbehaved by fundraising and colonizing in the name of Christ when Jesus teaches people will go to hell for fundraising and organized charity which is not true charity. It is business giving to get.

Matthew 6:1-4.

59. My Catholic Church also misbehaved by teaching people to give indulgences to be saved from sin when I believe the Bible clearly teaches damned to hell are those who think they may buy or barter their way into heaven. (See, *Acts* 8:20 “Peter answered: “May your money perish with you, because you thought you could buy the gift of God with money!” The man Peter scolded was damned dead to perish in hell which is sad. He will be no more, without eternal life).

60. Free exercise of religion is not for sale bought and bartered for exercise of religion, making those who have nothing to sell but their own souls, slaves not free. I believe the US Supreme Court is completely wrong in its decision in *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719 (2018) See the attached exhibit which was included at DI 4, A-5 to see how I incorporate herein by reference explaining why I believe the Court is wrong.

61. Business is not freedom. If business is deemed a freedom that makes people for sale property not free. I have to protect people’s freedom to believe differently than I, even to believe wrongly because love does not control, but cares for people. Damnation is guaranteed by conditionally compelling people to care by conformed by societal pressure or otherwise

gifting or sacrifice. This is not unconditional love but the mark of the beast, the twice dead to be destroyed without eternal life.

62. I strongly support separation of church and state to prevent the government cloak or the government dollar from making us less free by government backed compelled worship.

63. I do believe there is a global planned attack against the Catholic faith in particular, my faith.

64. The churches may place their fingers at me not the courts should I be permitted to argue government business is not freedom and churches and religious entities must not partner with the government.

65. To preserve freedom of religion from government compelled worship by the establishment of government religious belief through business, we must protect individual liberty which will protect the institutions of the church and religious organizations even if they lament based on love of money and material gain, not love of God. *See, Matthew 6:24.*

66. The church need not be perfect to be deemed protected and untaxed and unbought and backed by government.

67. St. Anne's Catholic Church is also special because I met the love of my worldly life there. Attached, please find pictures of the love of my life and me I incorporate herein by reference.

68. Judge Leah Chandler, is a former law librarian in Sussex I lovingly called the lovely librarian. She is a schoolmate, one grade below me attending the same elementary, middle and high schools. I see her as a friend. Her father-in-law is the former Chancellor of the Delaware Chancery Court, William Chandler. She married his son, Bill Chandler, a friend too.

69. Years ago, I got in an automobile accident with her little brother. Instead of being mad at me for colliding into the back of his truck, he asked me on a date. I had not been on a date in almost a decade, but I was conflicted because of the conflict of interest.

70. I went to St. Anne's church to 4:00 mass to pray about it.

71. While at St. Anne's, I met the love of my life that day. I declined the date with the lovely law librarian's little brother by leaving a message on his phone, and started dating the love of my life instead. While we are no longer talking, I am grateful for the time I shared with him.

72. St. Anne's the church is important to protect as an imperfect church even if I do not agree with all the teachings like praying to Mary who is not there as opposed to God.

73. I believe the US Supreme Court is falling into a trap that will eliminate the credibility of religious institutions as businesses down the line

74. I also believe money is not there to pay government pensions, and that government employees, not merely citizens will be harmed in a schemed crash that may be unraveled and reversed.

75. Attach, please find an article by BIS, the Bank of International Settlements and another article I incorporate herein by reference.

76. Finance Digest, London Reuters, in *BIS warns of \$80 trillion of hidden FX swap*, By Marc Jones stated “The Bank for International Settlements (BIS) has warned that [United States] **pension funds** and other ‘non-bank’ financial firms now have more than \$80 trillion of hidden, off-balance sheet dollar debt in the form of FX swaps.”

<https://www.financedigest.com/bis-warns-of-80-trillion-of-hidden-fx-swap-debt.html> See, https://www.bis.org/publ/qtrpdf/r_qt2212h.pdf Also see, <https://www.reuters.com/markets/currencies/global-markets-bis-urgent-2022-12-05/>

77. The money is not there. This will affect you should your government pensions by tied with the money and will be used to eliminate the dollar and government control through a debt credit system where private central banks will be permitted to act above the law and will be

deemed to be the law even though they gain more profit the worse off we are. They gain more the more we are in debt to it.

78. Per the Great Narrative I attached to the docket below on page DI 55-12, Page 86-87:

“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 innovations¹⁷ 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. 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 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.”**

79. I believe the banks will take over government’s authority to govern, without restraint in the form of the rule of law. Governments will

have no authority to govern them. The central banks shareholding members are banks.

80. The private entity, the Federal reserve shareholders are member banks.

81. Banks gain profit and power over governments, entities and individuals the more in debt they are.

82. There is incentive to make people and the environment worse off under the guise of sustaining the world, only to sustain power, profit and positions of the few who exploit the money to serve lusts under the guise of equality, freedom and law.

83. It makes sense that more than 80 trillion does not exist to pay out pensions and debts as they fall due. Entities write off debts. Banks create money out of nothing to enslave people to gain profit interest.

84. This Court was previously apprised in my belief that people go to hell for usury and the entire stock market is a Ponzi scheme, with resold debt no one may pay leaving the boomers without retirement. *DI 2. Ezekiel 18:13*

85. The global plan violates my religious belief on a greater magnitude. It appears to be a mere incremental step to eliminate dollar to

digital currency to eliminate governments authority down the line under 2050 agendas.

86. Should you think my concerns are unwarranted, at least you have your thumb on President Biden by keeping your thumb on me.

87. I have some ideas to reverse the crash by a mistrial of Kelly v Trump. Maybe my opponents or the Court will have better ideas. I have limited means and resources, whereas my opponents and the courts have easier more thorough access to the law.

88. The reciprocal discipline case arose in part, based on the Delaware Supreme Court's disdain for two petitions relating to exemption of bar fees, one in January 2021, and one in February 2021. DI 2-4, DI 69-75. The statute of limitations may expire should I not be permitted to maintain this action by a reply. I attach these petitions hereto and incorporate them herein by reference.

89. I have stated good cause by concerns and otherwise warranting an extension.

Wherefore I pray the Court grants my motion, only if a stay is denied.

Respectfully submitted,

Dated January 1, 2023

/s/Meghan Kelly

Appendix O

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Office of Disciplinary Counsel, Respondent, also known as, Delaware Office of Disciplinary
Counsel

On Appeal from the Delaware Supreme Court, Case No. 2022, 58

**Petitioner Meghan Kelly’s Motion for permission to exceed the word limit and page limit in
her writ of certiorari**

1. I Meghan Kelly, for good cause, respectfully request, the Word limit be excused in the above captioned Motion.
2. The amount of Words is unknown. I am having a difficult time narrowing the many issues. I may be required to waive some issues, even if words are granted, due to time and other constraints.
3. This case relates to a petition I brought against former-President Donald J. Trump under the Religious Freedom Restoration Act to protect my exercise of belief in Jesus Christ without government sponsored persecution. I attach the Complaint herein in its entirety and incorporate it herein by reference as Exhibit A.
4. This case represents an example of persecution based on my exercise of religious beliefs, contained in my speech in my petitions to the Delaware Courts.
5. In the August 23, 2021 letter attached hereto as Exhibit B, the Disciplinary Counsel indicated my religious beliefs contained in my speech contained in my private-religious

petitions is the source of their concern of my mental fitness to practice law. In the State's petition at 7, the Disciplinary Counsel points to my references to the bible, as evidence of a disability, incorporated herein by reference as Exhibit C.

6. 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 my request to prevent injustice by denial of words which essentially denies me the opportunity to be heard in defense of my religious speech reflecting my religious beliefs in my Freedom of Religion Restoration Act Complaint against former President Donald J. Trump. US Amend I, V.

7. This Court must grant my request for additional words to prevent government abuse against my person, oppression, and injustice. It is difficult for me to ask the Court persecuting me for my belief in Jesus, for help.

8. Nevertheless, the Constitutional issues must be addressed to protect not only me, but others beyond me from professional government backed persecution based on exercise of fundamental rights.

9. 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 for a mere license.

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

11. 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 citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. ¹

12. “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).

13. “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,

¹ See, *Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced, et. al*, No.15-105, 2015 WL 5013734 (US).(This Court allowed references to the bible in other RFRA petitions); See, *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.”) Also see, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.), cert. denied, 456 U.S. 908 (1982); (“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.”); *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa 1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, (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; See, *Holt v. Hobbs*, 574 U.S. 352; *In re Eternal Word Television Network, Inc.*, 818 F.3d 1122, 1140 (11th Cir. 2016)(“The Supreme Court cautioned that “federal courts have no business addressing” such questions of religion and moral philosophy.” (Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), “religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.”).

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.")

14. "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)

15. 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."

16. 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.

17. I must argue this case must be extended to me to prevent the state's punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my petitions, no matter how repugnant or illogical my religious beliefs appear to the state.

18. Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law, by making professionals the law, by self-regulating, money, not freedom, or the people, is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined.

19. I require more words to ask the Courts to exercise more of their power to prevent professionals from governing the nation as opposed to government elected or appointed impartial servants without a stake in the outcome against the accused, in terms of position or sustaining profit.

20. Additional words are needed not only to protect the Constitutional rights of the accused, but to improve the world, by allowed criticism, free speech, free enterprise, which helps professionals learn, and improve, not forced conformity under the threat of secret proceedings against professionals who think or believe differently.

21. The Courts guarantee injustice by making business the law. Making professionals who exercise private rights, including their religious beliefs in jeopardy of losing their ability to buy and sell merely for not adopting the government's or government backed preligious or secular belief in money and professional material gain and convenience as God and guide.

22. The Words are needed to argue, under the unique facts of this case in defense of my ability to buy and sell as a professional lawyer but for my exercise of my fundamental rights.

Wherefore, I pray this Court grants my motion.

Dated: 1/23/2023

Respectfully submitted,

/s/ Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
(1,541 Words)
United States Supreme Court No.283696

Appendix P

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Third Circuit Court of Appeals

On Petition for Writ of Certiorari to the United States Court of Appeals for the

Third Circuit, Case Number Case Number 22-8037

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QUESTIONS PRESENTED

1. Whether the Third Circuit's rule R.A.D.E. 16 violates **Equal protections** as applied to me as a party of one, as an attorney with religious political beliefs the Delaware Supreme Court labeled are a disability, and as applied to the group labeled disabled, by affording me and the group for which I am labeled with fewer Constitutional protections than attorneys disciplined by disbarment and suspension under R.A.D.E. 6, without a necessary or compelling reason somehow more important than foreclosing me and a class of attorneys the 5th Amendment fundamental right for the opportunity to be heard on Constitutional defects on the disciplinary order reciprocating cases are based.

II. Whether the Third Circuit Rule R.A.D.E 16 violates **procedural due process or substantive due process** by denying me the opportunity to be heard, as a party of one as an attorney with unique religious-political beliefs, and the class of attorneys labeled disabled the opportunity to be heard in defense of Constitutional liberties relating to the underlying Order the Third Circuit Reciprocal disciplinary proceedings are based, to safeguard property interests in the Third Circuit license(s) to practice law, reputation and related interests. US Amend I, right to petition

A. Whether this issue is capable of repetition. Yet, evading review.

III. Whether the Federal disciplinary proceeding violates case or controversy requirements under Article III, Section 2, Clause 1, since there is no opposing counsel or underlying case. The Court acts as prosecutor and judge. Alternatively, whether my Due Process rights are violated under the facts by allowing the judge to be the prosecutor as applied.

IV. Whether it is unconstitutional for lawyers to be regulated by the Courts other than during a case, 1. a law suit in which they represent a party or 2. where the lawyer is a party.

V. Whether it is un-Constitutional for federal judges to be self-regulated or regulated by Third Parties, by congressional rule or elimination of life time tenures, in violation of my religious belief as a party of one whose unique religious political beliefs requires she safeguards the impartiality of the courts as a religious exercise of her belief in Jesus. *Matthew 23:23, Amos 5:15*

VI. Whether the Third Circuit violated my invoked right against self-incrimination by using information submitted to in Kelly v Swartz, Case Number 21-3198 to file a reciprocal proceeding, despite my invocation of the 5th Amendment, given I immediately moved to strike the information from the record. The information was removed.

A. If not, whether the rule under R.A.D.E. V violates the 5th Amendment right against self-incrimination, and is capable of repetition yet evading review.

LIST OF PARTIES

I, Meghan Kelly, Appellant, Respondent am the only real party. There is no opposing party or opposing counsel. The Third Circuit Court of Appeals is the Court, and may be named as a party in name only, as Appellee.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. The Original disciplinary case in Delaware Supreme Court matter No. 22-58. Reciprocal disciplinary cases Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372, Delaware District Court No. 22-341, PA Supreme Court No 2913, DD3. DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction. *Kelly v Trump* Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522, *Kelly v Democrats* Chancery Court No 2020-0157.

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Appendix 1-a Constitutional and statutory provisions involved

Appendix A Order, dated August 18, 2022 denying an extension or even the right to draft a for cause motion other lawyers disciplined as disbarred or suspended are afforded under R.A.D.E. Rule 6 (Docket Item “DI” 8)

Appendix B Order dated August 17, 2022, placing my license on reciprocal discipline disability inactive status (DI 2)

Appendix C Docket of the Third Circuit Disciplinary matter Case Number 22-8037

Appendix D letter dated 16, 2022, where I invoke the 5th Amendment right against self-incrimination

Appendix E Order in Kelly v Swartz, No 21-3198 (DI 76) indicating my submission of the original disciplinary Order against me may be used to reciprocally discipline me and was used despite my assertion of the 5th Amendment against self-incrimination

Appendix F August 23, 2022 Letter indicating my religious speech contained in my petitions in Kelly v Trump was the reason for the discipline, not health concerns at DI Exhibit 43 (DI 9 in the docket below)

Appendix G Number 7 of the Delaware Disciplinary Proceeding (DI 9)

Appendix H Reply to the ODC’s Response to my petition (DI 9)

Appendix I My Objections to the Delaware Order (DI 9)

Appendix J Table of Contents of Objections to the Board’s determination

Appendix K Internal Table of Contents of Exhibits to Exhibit K referred to in the Table Contents and contained in the Objections to the Board’s Determination, Meghan Kelly’s Answers, Defenses and Objections to ODC’s petition

Appendix L letter dated January 7, 2021, to the Delaware Supreme Court where I request an exemption for all attorneys facing economic hardship, with attachments thereto showing my negotiations with my former law firm regarding salaries, and proof of my first salary as an attorney in the amount of \$135,000.00 (DI 9, found in Exhibit C to Appendix K)

Appendix M letter dated February 5, 2021 to the Delaware Supreme court regarding attorney fees and violations of the Equal protections clause by the case-by-case solution proffered by the Court (DI 9, Found in Exhibit B to Appendix K)

Appendix N Sealed documents A-4, My Motion to the Delaware Supreme Court to rein in its arms from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion, and exhibits thereto, including a letter to the Master in the Chancery Court concerning the staff seeking to sabotage my case, by misleading me to almost miss my deadline to appeal her final order (DI 9)

Appendix O Sealed Documents A-5, My motion for the Delaware Supreme Court to require the recusal of the Honorable Justice Collins J. Seitz, and related exhibits thereto (DI 9)

Appendix P Respondent Meghan Kelly's Motion to be excused from notary and affirming requirements in Delaware to prevent the compelled violations of her religious belief, dated June 7, 2022. (DI 9)

Appendix Q Respondent Meghan Kelly's Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law, and 3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th Protections, filed August 15, 2022

Appendix R Meghan Kelly's Motion to 1. declare the Reporting Requirements unconstitutional, requiring by written rule I violate my 5th Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation, filed August 19, 2022, and only Exhibit F therein, not all exhibits regarding Emails of which courts were notified, and Constitutional and ethical concerns on self-reporting

Appendix S Plaintiff's Motion to amend the complaint pursuant to FRCP 15 (a)(1) and FRCP 15(a)(2) to include additional parties, eliminate a party, include additional facts and include additional requests for relief. I included the five DE Supreme Court justices, including but not limited to Justice James T. Vaughn, Jr. and Justice Tamika Montgomery-Reeves

Appendix T Releases Justice James T. Vaughn, Jr. announces he will retire on May 1, 2023 after 25 years of service on the bench, dated November 29, 2022, and Justice Tamika Montgomery-Reeves announces she will step down in February to join the U.S. Third Circuit Court of Appeals, dated December 16, 2022

Appendix U August 13, 2022 Letter invoking the 5th and request to strike DE disciplinary Order from the docket

Appendix V Respondent Meghan Kelly's Addendum to Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, dated August 24, 2022

Appendix W Meghan Kelly's Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay

Appendix X Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 31, 2022, and move for a Judge, not the Clerk of the Court to render an order on this Motion for Reargument, and her Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, due to the fact I brought up mistakes or potential misconduct by the clerk's office to correct, to preserve impartiality

Appendix Y Petitioner Plaintiff Meghan Kelly's Motion to supplement the record with additional information, pursuant to Rule 10 (e) (2) (3) to include Meghan Kelly's legal theory for appeal of Case No 22-8037 to the US Supreme Court, and thwarted plans, in reviewing Petitioner Plaintiff Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 30, 2022 (DI 87)

Appendix Z Order by Justice Vaughn granting me the right to self-representation in Matter 541. The Court denied me the right to documents in the case relating to appointment of counsel. My latest request is contained therein in the email to the Clerk of Court.

Appendix AA Healthcare record, healthcare and mental healthcare concerns about care that harms patients, proposals to improve healthcare on the state and federal level, and college transcripts with courses related to healthcare and psychology.

Appendix BB Facebook present sense impression when people talked about shooting me for religious-political speech or perceived affiliation or beliefs

Appendix CC Email requesting the record on my case, in a separate matter which prejudices my case and denies me the opportunity to be heard on appeal to the US Supreme Court and below, since not all pleadings are on 22-58, despite previous denial by the DE Supreme Court.

Appendix DD Newspaper article I drafted regarding title companies practicing law without a license, messing up on the chain of title, costing DE many by untaxed professional work

Appendix EE Complaint Kelly v Democrats

Appendix FF Petition to the US Supreme Court concerning filing fees and signatures, Letter to the Democrat's Delaware Chair for an exemption from signature and filing fees in order not to violate my religious beliefs which was denied

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IN THE SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

The opinion of the Third Circuit Court of Appeals to review the merits appears at Appendix (“App.”) A, dated August 30, 2022. There is a previous Order by the Third Circuit, dated August 17, 2022 App.-B. There is no opinion to publish. There is no lower Court opinion.

JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254 or in the alternative under 28 U.S.C. § 1253.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Pertinent statutory provisions are reprinted in the appendix to this brief, App 1a.

STATEMENT OF THE CASE

I. Background of the DE-Disciplinary Matter and DE Civil rights Case

A Delaware Lawyer Disciplinary Order placed my license to practice law on inactive/disabled, but for my religious-political beliefs and poverty and exercise of the fundamental right to petition the Courts to alleviate a substantial burden upon my religious exercise, First Amendment rights to private-religious-political speech, private-religious beliefs, private-religious association and private exercise of religious belief, and to petition the Court relating to bar dues, and procedural Due Process violations, without disparate treatment unlike attorneys similarly situation in violation of the Equal Protections Clause. App F-S. US Amend I, XIV.

I filed a Religious Freedom Restoration Act lawsuit (“RFRA”) law suit against former President Donald Trump to alleviate a substantial burden upon my religious exercise, but for the establishment of government religious belief by a course of conduct, including the passage of executive orders granting churches government money as agents of the state to perform government work, and granting churches the legal authority to use other people’s money, the parishioner’s, to back candidates and parties. App H-K This government money and government backing and buying of churches incited violence against my person. Id.

During *Kelly v Trump*, Chancery Court staff prevented service of the complaint to local counsel Attorney General David Weiss. App. N-O. A Delaware arm, DE-Lapp sent a threatening letter based on petitions regarding bar dues, Judge Kenneth Clark of the Court of Common Pleas attempted to bully me into forfeiting my right to access to the Courts and the Delaware Office of Disciplinary counsel sent threatening letters in an attempt to cause me to forgo my law suit against former Donald J. Trump. Id.

My writ of certiorari to this Court under No 21-5522 I incorporate herein by reference was denied on or about November 1, 2021. Looking back, I should have argued the case was voidable based on procedural and substantive due process defects. (See, *May v. Anderson*, 345 U.S. 528, 537 (1953) “It is void ... if it denies due process of law.”); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments “ are void for lack of due process of law, or should be set aside for error.”); (See, *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005) (The Third Circuit held, “A judgment may also be void if a court "acted in a manner inconsistent with due process of law).

I drafted motions in *Kelly v Trump* alerting the Court concerning actions by state government agents to apparently impede and obstruct my access to the courts in that proceeding,

I attach here and incorporate herein by reference. App N-O. I objected to such interference. *Id.*

The First Amendment prohibits state officials, employees and agents from retaliating against claimants, such as myself, for exercising the right of access to the Courts in defense of the exercise of my First Amendment religious belief, religious-speech contained in the petitions, religious association, and religious exercise. *Id.*

"[T]he Supreme Court . . . consistently recognized `that retaliation" by public officials against the exercise of First Amendment rights is itself a violation of the First Amendment."
Uniontown Newspapers, Inc. v. Roberts, 576 Pa. 231, 253 (Pa. 2003) (Internal citations omitted)

I argued the state and its agents were not entitled to immunity under the US Supreme Court's 2-part test under *Saucier v. Katz*, 533 U.S. 194, 201, (2001). Citing, *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015); *but see, Pearson v. Callahan*, 555 U.S. 223, 227 (2009) ("We now hold that the Saucier procedure should not be regarded as an inflexible requirement and that petitioners are entitled to qualified immunity on the ground that it was not clearly established at the time of the search that their conduct was unconstitutional.")(This case is distinguished from the present case since 1st Amendment free exercise of religious beliefs, speech, association, exercise of religious beliefs, and the right to petition are clearly established Constitutional rights that should be known by the Court and its agents at the time of their misconduct in violations of those rights and federal laws.).

I brought a law suit in the Delaware District Court prior to the institution of the Delaware Disciplinary Proceeding and prior to the conclusion of *Kelly v Trump* to *inter alias* seek relief for procedural due process violations, ongoing interference in *Kelly v Trump* and retaliation for the exercise of my fundamental rights, by the Delaware Disciplinary Counsel ("DE-ODC").

The Delaware Courts have a long history of denying and ignoring my religious exercise by compelled violations. See for example App P. Affirming and swearing is against my religious beliefs in Jesus. I was required to swear into the Delaware Bar despite my previous request to affirm. At the time, I did not understand affirming was sin too. My request for an exemption under new rules implemented by a Delaware Court were denied without a necessary reason somehow more important than my fundamental right to religious exercise and belief by compelled violation in exchange to access to the courts. App P. See also App. I, and exhibits thereto too voluminous to attach in the appendix. US Amend I, XIV, V.

I brought *Kelly v Swartz*, et al, on or about October 25, 2021, for equitable relief, and damages caused by the Delaware disciplinary counsels', court members' and the State's interference in my Religious Freedom Restoration Act lawsuit ("RFRA") against former President Donald J. Trump (referred to as "Kelly v Trump"), in violation of 42 USC §§§ 1983, 1985, 1988. I sought claims for emotional distress, First Amendment violations, loss of employment opportunities, or other economic harm, and harm to my reputation. (Docket Item in the Third Circuit (hereinafter referred to as "DI") 9, App. H-P).

I also sought claims for Delaware's selective prosecution in bringing a disciplinary action against me to demean my reputation by placing my license on inactive disabled 1. to conceal Defendants misconduct in collusion with the Delaware Supreme Court, and 2. to punish me for exercising the right to access the courts and First Amendment rights, based on Defendants disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. Id.

I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with the Board and DE-ODC to

prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from *Kelly v Trump*. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and *Kelly v Trump* due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party, and each of its members in their individual and professional capacity.

I include and restate and incorporate by reference Respondent's reply to ODC's Corrected Response to Respondent's Objections my to the Report and Recommendation of the Board on Professional Responsibility, dated June 7, 2022, and all documents referred therein and incorporated thereto, although they appear only on the record below, and not contained in the appendix as too voluminous. (App. H-R, DI 9)

The Delaware Disciplinary proceeding was brought around or about November 3, 2021, after I filed the law suit in the DE District Court, and after my writ of cert was rejected by this court. As the DE Disciplinary case proceeded the state of Delaware through the DE-ODC, Board and Court violated my 1st and 14th Amendment rights at the inception by sending out notice to no one on the date the Board averred to send out notice of a hearing. Three days after issuing the notice to no one, the DE Supreme Court appointed counsel despite my previously stated objections on First Amendment religious beliefs and 6th Amendment religious beliefs, providing notice which did not conform to its own rules. The Board gave me 18 days, when the DLRDP Rule 9(d)(3) required, they provide me with notice "at least 20 days in advance of the hearing date," which prejudiced me. "It is well established that it is a denial of due process for

any government agency to fail to follow its own regulations providing for procedural safeguards [in my case 20 days prior notice] to persons involved in adjudicative processes before it.”

Government of Canal Zone v. Brooks, 427 F.2d 346, 347 (5th Cir.1970). *See, Bridges v. Wixon*, 326 U.S. 135, 152, (1945) (“The rules are designed to protect the interests of the alien and to afford him due process of law.”); see, David H. Armistead, *Substantive Due Process Limits on Public Officials' Power to Terminate State-Created Property Interests*.

The Court and the Board ignored and never addressed my motions I filed immediately rejecting appointment of counsel and firing the attorney, objecting to defective notice, and requesting time to perform discovery in order not to deny me meaningful opportunity to be heard in defense of my exercise of fundamental rights in violation of US Amend I and XIV.

When I received notice I could self-represent, I had fewer than 14 days until the hearing and fell ill with the shingles, at the time the Court issued. (App Z) I received the notice before a three-day holiday. I filed motions swiftly, objecting to notice, requiring additional time to prepare, call witnesses, perform discovery and research. I required for meaningful access to the courts. My petitions were denied. I was granted an 8-day extension, due to a reason I did not allege in my motions, the shingles. This was not enough time to be heard on my ignored motions or to prepare. The DE Supreme Court rendered an order without granting me the opportunity to be heard with an appealable order. The Board gave a non-appealable email order. I was denied access to discovery, meaningful opportunity to prepare in the fixed proceeding against me. I filed additional motions you may see on the table of contents that were not addressed. App. J-K (DI 9)

On January 24, 2021, I moved the Delaware District Court to amend my complaint as a matter of right to include Delaware Supreme Court Justice Reeves and Vaughn, wherein I discussed the procedural defects and Equal Protections violations they participated in in *Kelly v*

Trump and the Disciplinary matter. The Clerk confirmed the entire court not merely Chief Justice reviewed the bar dues requests which was the admitted reason DE-Lapp attacked me. The Motion was not addressed by Chief Justice Colm F. Connelly.

It was not until January 2023, I discovered Justice Vaughn and Justice Reeves both resigned from the Delaware Supreme Court to evade the law. App. T. President Biden appointed Justice Reeves to the Third Circuit, knowing I desired to substitute him in *Kelly v Trump*, after he signed an order giving foreign churches government money under the guise of performing government business. President Biden worsened the establishment of government religion the past 4 presidents created through government agents and partnerships with foreign and private religious partners.

After the Board hearing, I discovered the DE Supreme Court prevented discovery to conceal the termination of two Court staff with material information necessary to my case to prejudice the fixed outcome against me. The DE Supreme Court's agent, Attorney Robinson signed off on their departure forms.

After the hearing, I also discovered the Court sealed my petitions regarding Due process violations and the Court's member's participation in inciting these violations, which prejudiced my defense in the disciplinary matter. App N-O. I thought they were sealed during the preliminary hearing, but they were sealed during *Kelly v Trump* to also prevent this Court from reviewing an accurate record, to fix the planned disciplinary proceeding against me, to prejudice me in the federal civil rights case or reciprocal cases, and to demean my credibility and reputation based on the Court's disdain of my private-religious-political beliefs contained in the speech in my petitions. *See, Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407 (2022) ("The Free Exercise and Free Speech Clauses of the First Amendment work in tandem: where the Free

Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities.”)

The Disciplinary hearing was flawed. The reporter did not transcribe my testimony accurately and colluded to fix the shame proceeding against me. I objected even after I filed objections to the inaccuracy of the transcript. The Reporter placed weird statements in my mouth I did not say. Reliance on the inaccurate sham transcript of the hearing and the accusations against me based on my poverty and lack to access to resources shocks the conscience in denial of my procedural and substantive Due Process rights. I was required to attend, without necessary time to prepare while ill in order to prevent a contempt Order.

None of this was normal, firing material witnesses to conceal their testimony, denying me the right to self-represent, to call witnesses, to prepare, to perform discovery, removing my pleadings without notice or an opportunity to be heard and resigning from the court to evade the law are not normal. Nor is it normal to require I violate my religious beliefs in exchange to access to the courts. The Delaware Supreme Court, Board and DE-ODC violated my procedural due process rights and I have colorful Constitutional claims to contest the proceeding.

The DE Supreme Court denied my requests relating to my request for a copy of the documents in the In the matter of Meghan Kelly No 541, appointing counsel and granting me the ability to self-represent despite my written request for the papers against my person, and any transcript relating thereto. App Z, App. CC.

Despite having sound reasons to contest the Reciprocal Order by the Third Circuit, my attempts to preserve the right to file a for cause motion were denied by the Third Circuit. App. A-B.

III. Background basis of Third Circuit Disciplinary Case violated US Amend V

On August 16, 2022, I drafted a letter to the Third Circuit for the reciprocating matter invoking the 5th Amendment right against self-incrimination as required by its R.A.D.E. R. 5. App U.

I filed the DE Supreme Court Order of Discipline in the separate Third Circuit civil rights case *Kelly v Swartz*, to maintain electronic filing under the mistaken belief the state reported the Order. App U.

I moved to strike self-incrimination information from the record. App U-Y.

On August 17, 2022, the Case manager on the Disciplinary Case entered an Order that the DE Order may be used in a reciprocal case in violation of my US Amend. V. App. C

The self-incriminating reporting Order was given to a federal judge or a panel of federal judges who prosecuted me, the attorney by reciprocal deactivation of license that same day. App.A-C.

In *In re Gi Yeong Nam*, 245 B.R. 216 (Bankr. E.D. Pa. 2000), the Court held:

“Once a witness voluntarily reveals an incriminating fact, Fifth Amendment privilege against self-incrimination cannot be invoked to avoid disclosing the details of that fact unless the witness' answer to the particular question posed would subject him or her to a “real danger” of further incrimination.” U.S.C.A. Const. Amend. 5.

In my case, volunteering information by reporting orders against my license subjects me to automatic government prosecution. The fact I appeal orders on public record before appellate

courts, does not remove the “real danger of further [government prosecution] in proceedings likened to be both criminal and civil in nature.” Id.

This Court in *Spevack v. Klein*, 385 U.S. 511, (1967) held:

“Within rule that Fourteenth Amendment secures against state invasion the same privilege that Fifth Amendment guarantees against federal infringement, that is, right of person to remain silent unless he chooses to speak in unfettered exercise of his own will, without suffering penalty for such silence, “penalty” is not restricted to fine or imprisonment but means imposition of any sanction which makes assertion of Fifth Amendment privilege costly.”

This Court further held, “Self-incrimination clause of Fifth Amendment as absorbed in Fourteenth Amendment extends its protection to lawyers and should not be watered down by imposing dishonor of disbarment and deprivation of livelihood as price for asserting it” Id.

The Court acted as the prosecutor, the judge and witness too, without a case or controversy requirement. The Third Circuit compelled me and other attorneys to provide testimony against my person at the threat of certain prosecution and increased penalties for failing to report in violation of my right not to self-incriminate.

Self-reciprocal Disciplinary reporting requirements by disciplinary command under R.A.D.E. R. 5. run afoul of the Constitution by compelling professionals to waive Constitutional rights under the threat of additional punishments. The self-reporting requirements relating to lawyer disciplinary proceedings should be deemed unconstitutional as applied and per se.

Even if this Court may find I waived my 5th, this issue is capable of repetition, yet evading review. *Wisconsin Dept. of Industry v. Gould Inc.*, 475 U.S. 282, 286 n.3 (1986). This issue must be considered to preserve the Constitutional limits on government which makes us freer.

IV. Federal Courts may not be regulated and controlled by self-regulation or third party regulation

I am a Christian. The Delaware Supreme Court finds my religious beliefs a disability. I believe differently. I believe a lot of things people think are no big deal are a matter of eternal life and damnation in hell, the second death. Every moment, every little thing, every second of my life matters, and it is not for sale for money or material gain. I gave it to God.

Protecting freedom under the Constitution means not selling your people under the lie slavery to money to pay government compelled private or foreign debt is freedom. People should be able to choose to work by free not government forced choice. Otherwise, there is no freedom, just bondage in a forced not free economy in violation of US Amend XIII.

Government collusion with private and foreign partners to fix a forced not free economy creates subpar products and services by stifling innovation by freedom of thought through standardization, based on bought or bartered for partnerships, not freedom. I desire the Courts exercise more authority by judging the experts, professionals and standards to prevent businesses from being above the law, above correction, above government and government's guidance to prevent oppression, killing, stealing and destroying life and liberty for material gain. I wish defamation laws would be ruled unconstitutional as they chill free speech would improve products and services by Godly criticism. Instead these unjust laws stifle improvement by threat of losing money by entities who buy guaranteed injustice by burying the common man in legal fees for a fighting chance to do what is right, exposing evil to transform it to good.

Eliminating the right to work in the field of my choice based on my religious beliefs allows exploiters to oppress people, including me, by substandard wages because of the

government created desperate conditions. This is government backed slavery in violation of my 13th Amendment right against involuntary servitude and religious beliefs against indebtedness.

The Delaware Supreme Court participated in inciting the disciplinary proceeding, terminated witnesses, prevented their discovery, and denied me meaningful opportunity to be heard by conduct which shocks the conscience. App. H-P.

This has caused additional courts to place my license on inactive disabled, causing multiple reciprocating law suits in jurisdictions where I am licensed or retired to practice law in, including the Third Circuit Court of appeals. App A-C

The Third Circuit placed my license on inactive/disability without affording me Constitutional protections afforded to similarly situated attorneys placed on suspension or disbarred, arguably in violation of the Equal Protections Clause applicable to me as an attorney with unique religious-political beliefs, and to the class of lawyers adjudicated disabled. Id.

The most recent order relates to documents I filed including but not limited to Motions filed with the Delaware Supreme Court containing Constitutional arguments against lawyer self-regulation and third-party regulation. App B, Q, R, DI 9.

I seek this Court's consideration of my Constitutional arguments to be extended to the Federal judiciary. Id. I argue standing as an attorney seeking to uphold the impartiality of the Courts as a religious exercise. I move this Court to rule that federal judges may not be regulated through self-regulation or third-party regulation beyond the procedures of the Court, even if this Court denies my other arguments.

Such regulations of the federal judiciary create injustice, making us less free, by tempting federal judges to render orders based on their collective interests or based on the interest of third parties who regulate their seats as opposed to the impartial rule of law.

I believe judges may only be disciplined under Constitutional Law by impeachment or by law suit, not by third party or self-regulation. Congress's proposals to the contrary, and their use of societal peer pressure as well as the pens, law making authority is repugnant. Albeit, they may outline internal rules regarding impeachment. Congress is acting above the above the law, and above the Constitution in an attempt to make judges puppets to the partial interests that serve their seats.

I also oppose eliminating life time tenures as that will tempt federal judges to be partial towards the interests of those who maintain their seats as opposed to maintaining impartiality necessary to safeguard the rule of law.

I strongly oppose, as an attorney, in inactive status, term limits or Congressional control over the US Supreme Court. I also oppose self-regulation. Impeachment and law suits are the two means to correct judges. No judge should be controlled by business professionals, including professional boards, or by Congress, outside of written rules they may draft relating to impeachment. The judges will be tempted down the line by automation's ease, to potentially have their position as judges eliminated through automation.

Automation has no power to render justice with mercy like judges. Judges have the ability to critically think beyond the standards, to see clearly the unique case before it, to render true justice based on truth, not conformity or sameness. Judges have a duty to protect people's freedom who think differently than they do, even if they believe those beliefs harm business's

bottom line. What is more important money or freedoms under our constitution? I argue the Constitutional laws protecting individual liberty and individuals supersedes professions and entities who desire to sacrifice individual liberties or individuals for the entities or associations bottom line

As a Christian I believe “justice in the courts” is a command by God. *Citing Amos, 5:15*, Jesus Christ teaches justice, mercy and faithfulness are more important laws than laws relating to money and material gain. *Matthew 23:23*.

I believe the other two branches are not free, but are controlled by partisan collective interests to be enslaved by entities who entice their interest, not free to do what is right.

The other two branches give us a Republic, by granting us alleged majority representation. The judicial branch gives us freedom and a Democracy in our Democratic-Republic by preventing the mob reign of lusts by majority by restraining the desires of the many with the impartial rule of law.

The judicial branch protects individuals and Constitutional individual liberties from being sacrificed for entities and the majorities dictates through the vote or government partnerships. Individual Judges are more powerful than entities or groups or the other two branches because they may down their individual and collective desires to care to think in order to unconditionally uphold Constitutional rights for individuals who do not conform to the majorities’ religious or political beliefs. Entities, parties and the other two branches act conditionally, and are not free to unconditionally due what is right by collective control by those who entice their conformed interests through temptations.

People on the bench are special in that I believe they may reflect the image of God by unconditional love and respect, even for those whose religious beliefs they find insulting and repugnant, like me. The other branches may do not good by unconditional love, since they act upon conditional collaborative collective interests.

Individuals are more powerful than collective groups since they may lay down the collective groups' desires, to think, to care to know truth, in order to do what is right, not what is self-serving for the alleged many by sacrificing the few under the guise of the common good.

There is an attack of people judges. I gave opposing counsel in the civil rights case excerpts from a book, the Fourth Industrial Revolution, and video clips showing the World Government Summit and World Economic Forum are talking about eliminating people judges and people lawyers.

I also filed an article in the civil rights case concerning judgeless courts in China. The temptations to entice judges to create the appearance of partiality is meant for the court's destruction down the line to eliminate individual liberties that exceed the standardized algorithms of automation.

This Court may stifle the plans to eliminate the courts by preventing standardization by self-regulation or third-party regulation which prevents courts from protecting the exercise of Constitutional rights by those who do not conform to the standards of the many, like me.

This Court does not waive its right to eliminate partiality to self-interests or third-party interests at the cost of making those interests more important than the Constitutional preempting law. The Contract Clause may not bind the courts where there is no meeting of the minds, nor has any waiver occurred.

I believe a holding that the Court may not be compelled by partiality towards third party interests who regulate them or self-interests is a step towards eliminating people judges.

Without people judges, none are free, but are for sale by barter or exchange to serve the collective interests of entities.

I am aware of the societal peer pressured attacks against judges on the news, by congress and on social media. Please be strong, remain impartial, due not give into temptation by societal peer pressures to create the appearance of partiality. You must use the rule of law to overcome lawless selfish lusts to place position first in order to protect your position.

I ran for Delaware local office in 2018, because my esteemed colleague, Dick Goll, Esq. was taken advantage of by out of state foreign title companies practicing Delaware law without a Delaware license. App D I discovered this misbehavior was rampant throughout Delaware by talking with other real estate attorneys who saw the chain of title on deeds were messed up with no attorney to call to remedy mistakes. I drafted the attached article in hopes to alleviate the situation. I called the Office of Disciplinary Counsel to remedy the situation. It is not until now that I realized no Office of Disciplinary Counsel has legal authority to prevent the practice of law by non-attorneys through entities using automation.

Upon information and belief, there really is a plan to not only dismantle and create a new economic model, that will be changed to a far worse model down the line, but there is also a plan to eliminate the institutions of our government that make us freer. There is a planned attack against the courts. Please use this case to prevent the elimination of people judges by standardization through regulating federal judges. This is a step to prevent automating the rule of law which

prevents justice and constitutional protections from being eliminated to those who do not fall into the standards in algorithms.

V. The system of reciprocity violates Case and Controversy Requirements

Federal reciprocity of the Delaware Order requires the Third Circuit Court to be the prosecutor, the judge and witness too, not an outside adverse party, violating the case or controversy requirements of U.S.C.A. Const. Art. 3, § 2, cl. 1.

In federal reciprocity cases, and in this case, I do not serve an opposing counsel as reciprocal discipline is conducted against me. I am defending myself against required Court prosecution where I, the accused, am required to bear the burden of clear and convincing evidence as to why the Court must not prosecute me, in potential violation of my Fifth Amendment rights, or as in this case, I am deemed worthy of fewer rights to contest proceedings in violation of the Equal Protections Clause, procedural and due process clause as applied to me as a party of one, and to the class of attorneys labeled disabled. US Amend I, V. (App. Q-R)

The Third Circuit held,

“The existence of a case or controversy requires: (1) a legal controversy that is real and not hypothetical; (2) a legal controversy that affects an individual in a concrete manner so as to provide the factual predicate for reasoned adjudication; and (3) a legal controversy with sufficiently adverse parties so as to sharpen the issues for judicial resolution. *Rendell v. Rumsfeld*, 484 F.3d 236 (3d Cir. 2007)

The Third element is not met in all cases before federal disciplinary hearings. There is no adversarial party when the entity prosecuting is judge and jury, including mine. This system of automatic as opposed to discretionary discipline must be overturned to preserve the Constitutional liberties of the accused. This issue is capable of repetition, yet evading review,

and should be, in the interest of justice be considered by an impartial judicial forum. A federal court will not admit it violates the Constitution by blindly adhering to its internal procedures. Id.

This Court must, in the interest of justice, consider these important issues.

VI The case and controversy requirements are not met in my case.

There arguably is no controversy in my case, just a cover up of court misconduct, elimination of witnesses, the wrongful removal of four public documents material to my defense from public records, and government persecution towards me, but for my First Amendment exercise of or assertion of my protected Constitutional rights. Id. The record shows, I do not intend to practice law before the courts should the restriction on my license be lifted. I intend to seek to rejoin my former law firm where I would perform real estate settlements. Id.

There is no harm to the state of Delaware or the Third Circuit Court of Appeals showing a case or controversy. In the DE case, there are mere complaints about my lack of resources due to poverty, run on sentences, typos, and citations to the sham fixed transcript. “I maintain my objection to, where the reporter misrepresented what I said to intentionally collude to fix the outcome or because she could not hear me.” Id.

The record also shows the State reciprocal court laments I discuss the bible as a source of my religious belief relating to petitions where I assert and defend my religious exercise. Id. App F-N. My religious beliefs and compelled violation of those beliefs and exercise of my religious beliefs are in issue as the protected liberty interest I sought to protect in *Kelly v Trump*, and one of the liberties I seek to defend in this present case, and the original reciprocating appeal I must draft and file. It is unconstitutional for the Court to persecute me, because I invoke my First Amendment right of belief, religious-political-belief, religious-political exercise, religious-

political-association, religious-political-speech, and my right to petition the Court to uphold these religious-political fundamental rights, despite the State's disagreement with my beliefs, typos, or inconvenience that my poverty, or religious-political genuine beliefs creates to the court.

My association as a Christian who believes business greed is the mark of lawless lusts misleading many to lose eternal life by making money and professional pride above the law does not warrant discipline based on the state's disagreement of my religious beliefs.

This Honorable US Supreme Court held, in *Schwartz v. Board of Bar Examiners*, 353 U.S. 232, 233 (1957) "The use of aliases, the arrests, and former membership in the Communist Party do not in combination warrant exclusion of petitioner from the practice of law"

Since the association as a communist does not warrant disbarment, my association as a Christian should not similarly not eliminate my interest in my license to practice law based on my exercise of fundamental rights, including the right of association and belief and exercise of religious belief in Jesus, God the father and the holy spirit as Word of God.

The State Court is aware of my circumstance. Due to lack of resources, working computers, printers, paper and other luxuries, I had typos and run on sentences in some of my pleadings. I did not have the luxury of time or resources to proof read or correct documents. I typed desperately wherever I could use computers or print documents, including at libraries, with limited time at the computer. I was required to file timely or waive my rights. I do not regret imperfectly standing up for my religious belief from government persecution.

I would regret doing nothing. If I am unable to exercise the most basic First Amendment rights, speech, belief, association, exercise of belief and petition, then I may logically assume

others are not free. Standing up for myself, now, no matter how imperfectly, may create precedent to stand up for the rights of others, well past my fleeting, soon to be forgotten life here.

In App. R I, No. 35-36 stated,

“The State Court grasps at straws by holding there is evidence of either a physical or mental disability. The state appears to be claiming my belief in Jesus is a disability, or there is a physical disability alluding to a possible physical disability as a harm to the state, with unclean hands, as the State has notice of my limitations. The state rushed the proceeding in violation of my right for an opportunity to be heard, notice, an opportunity to prepare and defend perform discovery, call witnesses, having motions ignored, left unaddressed, in the forum below, or above, and intentionally caused foreseeable emotional distress, **in hopes to make me physically ill to use it against me, like heartless monsters.**

I dispute the allegation of physical disabilities as an “or” source for the State Court’s holding. The record excludes sufficient evidence to make such a finding. Even if on appeal, the Court finds physical limitations, such as the shingles temporarily caused in my case or otherwise, such limitations would not limit my ability to practice law. **And if such limitations are found, I invoke the protections of ADA protecting me from state discrimination, either by denial of meaningful access to the courts based on alleged disability, or denial of First amendment rights based on such disability, or my license to practice law based on any such alleged disability, without accommodation by the state.** I reserve this for appeal.”

I in fact due have a physical limitation that requires I rest, drink water and exercise in order not to jeopardize my life and health, the Delaware Supreme Court and all lower courts were apprised of. App AA.

Despite this my health has been jeopardized. I do not feel now, and fear worsening to my health and even death if I am not afforded **time** to rest, drink obscene amounts of water and exercise which I have been denied by multiple courts. It is most urgent to file this appeal more immediately, even as I have work in other matters. None are free if the Courts are eliminated by automation. Please excuse errors as I write in haste and fear.

Whether Constitutional protections are violated by the reciprocity system is a more important issue than mere appearance, and productivity, in terms of material gain for professions or businesses, at the cost of sacrificing freedoms.

The Courts, as government servants, work for justice, not money. If government judges, law makers and presidents care more about money and draft, enforce, and uphold rules that violate the more important Constitutional laws, than none of us are free. If money is the law, then the people are slaves to the government by artificially indebtedness, under the guise of freedom.

I have a duty to uphold the Constitutional laws that protect something more precious than all the money in the world, individual liberty from government incited private or public economic, physical or social burdens upon, but for the exercise of such Constitutional rights.

This Court's duty to uphold the same is even more stringent. The Constitution protects me from the Government, including the Courts from persecuting me for the exercise of my fundamental rights. Sameness is not fairness. Respecting people's individual liberty to believe, think, associate, live, exercise belief, and rights by the dictates of their conscience, no matter if it does not conform to the majority is a Constitutional duty of this court by its oath.

Even though, I oppose oaths on religious grounds, because of 13th Amend compelled slavery and other reasons, I assert current law under religious objections. App. P

In order to safeguard freedom, the government must let go of control. Allowing lawful disorder by the exercise of liberties and freedom creates in a world where not everyone is the same or chooses to believe the same or live the same is required. Otherwise, none are free. All are slaves to the conformed will of those with authority in private or public.

The government's duty is to care for people, while protecting the people's freedom, not control and exploit the people for material gain and productivity, under the guise of order and improving the man-made-unnatural economy.

The issues relating to government compelled self-incrimination by the reporting requirements and the case and controversy issues are capable of repetition, yet, evading review. This Court must in the interest of justice consider these Constitutional issues. Otherwise, no other Court may and violations of freedom for the convenience of the government backed private business partners will continue into infinity, sacrificing humans for business greed, not good.

VII. Self-Regulation

Self-regulation takes government out of the hands of the government and makes business above the law, by making business, and professionals desire for money, the law.

This biased self-regulation enslaves professionals to business greed, not good, not based on freedom in a fixed bad business economy.

Allowing Professionals to self-regulate, corrupts justice by tempting professionals to look after their own, at the cost of exploiting others, untamed by the just rule of law to prevent killing, stealing or destroying human life for what I argue is the mark of the beast, business greed. Professionals have a tendency to conceal their own misconduct to prevent harming their mere appearance, and reputation of their colleagues.

Self-regulation by deferring to professional standards causes injustice, by preventing courts from correcting professional standards that harm people.

As a child of God, I believe people sin by teaching man to blindly trust science, professionals, experts, research or innovation. I believe people are misled to harm by blindly trusting in man, the creature, the created and his creation, his scientific work, research, products and services as god and guide. Science is the mere study of things. When scientific speculation aka hypothesis are wrong and harm and kill people, such as bad medicine, the courts must have

the power to correct experts. Should the courts defer to experts, they wrongly make non-government businesses or entities through their experts the real ruling power. Entities may act unrestrained by the law to govern and guide it for the protection of citizens and individual liberties. This allows human sacrifice and slavery which is repugnant to my religious beliefs. US Const. Amend. XIII.

Perfection is not the standard, even for judges. Where there is humility, there is grace, improving the world here and in eternity. Where Government and government backed partners teach loyalty to profession, pride in profession, or position above loyalty to the Constitution, or where business is the law, there is lawlessness, by sacrificing people, and individual liberty for material gain.

This lawlessness, and corruption within government creates a threat of economic, physical or social persecution against my person and the public.

Partial forums, including this Courts, as applied against me as a party of one, and against the class of lawyers labeled disabled, and the professional Boards, focus on professions, guarantee lawless injustice by focus on money instead of caring for people and their individual liberty above money, productivity, costs and convenience.

The practice of law is not a mere business. The practice of law protects freedoms that are not for sale, by barter or exchange. Money is not the law. Selling a free people as subjects and slaves to gain money, material gain or to sacrifice to alleged Mother Earth for the lie of the common good, is not upholding the Constitutional laws that prevent slavery by upholding free exercise of liberties.

The practice of law requires independent, impartial, critically thinking judges who uphold people's Constitutionally protected freedoms to think, live, believe, exercise belief, associate by the dictates of their independent, individual conscience, not the dictates of money or professionals.

Injustice is guaranteed when a judicial determination is for sale, a matter of barter or exchange as opposed to truth under the law. This affords those without anything to exchange, except their souls to slavery in violation of the 13th Amendment, at a disadvantage, in violation of the Equal Protections Clause's protection of the poor, and common person's fundamental right to access to the courts. US Amend I, V, XIV The Courts must be more concerned with actual justice than the mere appearance of justice to serve their positions.

Self-regulation of attorneys, other Professions and judges is unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law

VIII Equal protections, due process and substantial due process claims as applied to me as a party of one and as applied to attorneys labeled disabled.

Per App H-P, I have good cause to contest the Third Circuit's reciprocating order. Nevertheless, the Third Circuit's rules deny me and other attorneys labeled disabled the Constitutional protections afforded to other disciplined attorneys to argue such cause. See R.A.D.E. Rules 6, 8 and 16.

On or about August 17, 2022, the Third Circuit filed an Order automatically transferring me to disabled inactive, without an opportunity to be heard on procedural defects. App B

The Third Circuit Court in Matter No. 22-8037 held “When she believes she should be reinstated, or if she desires to contest this transfer, formal reinstatement proceedings can be instituted. See R.A.D.E. Rules 16.3, 16.5.”

Under R.A.D.E. Rules 6 and 8, suspended and disbarred attorneys, in reciprocal and *ab initio* or other disciplinary proceedings are afforded more Constitutional protections than those adjudicated disabled/inactive.

I, individually, as a class of one, an attorney with unique religious-political beliefs, and as an attorney in the class of attorneys labeled disabled/inactive, receive fewer Constitutional protections in violation of the 5th Amendment’s Equal Protections component applicable to the Federal Courts, in the defense of my exercise of Fundamental First Amendment rights. US Amend I, V.

All other attorneys are afforded 30 days from the date of the Order to plead why the reciprocal discipline should not be adopted by its court, including procedural defects. R.A.D.E. Rules 6 and 8.

In my case, I have many arguments relating to substantive and procedural due process violations, lack of subject matter, and other arguments. (DI 9, App F-P)

I desired to argue the following, among other arguments:

“The imposition of discipline is unwarranted in this case. The record shows the procedure was so lacking in notice and opportunity to be heard as to constitute a deprivation of due process. There was such an infirmity of proof establishing the alleged misconduct as to give rise to the clear conviction that this Court could not, consistent with its duty, accept as final the conclusion on that subject. The imposition discipline by this Court would result in grave injustice.”

“The hearings and actions taken against my professional license in retaliation for my exercise of Constitutional rights, violate my 1st and 14th Amendment free exercise of religious beliefs, religious-political-speech, petition and association , the Procedural and Substantive Due Process Clause and Equal Protection Clauses Protections under the 1st of the 14th Amendments. They must be rejected as by “rule of law” rather than personal

vendetta for my personal religious-political speech contained in the petitions. (US Amend I, XIV)”

“The State denied me of substantive and procedural due process rights in the Delaware disciplinary proceeding, denying me meaningful access to the courts, preventing discovery, eliminating witnesses, sealing my petitions to the advantage of the state, and denying me the right to perform discovery to conceal Court misconduct in hiding material evidence in my favor.”

“The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, and poverty animus, in retaliation against me for filing *Kelly v Trump* and for petitioning the court regarding bar dues to safeguard my liberties.”

“The state courts are also without subject matter jurisdiction due to their conduct and interference with *Kelly v Trump*, to fix the outcome of that case and the Delaware Supreme Court’s participation in fixing the sham trial against me in the disciplinary action by violating my procedural and substantive due process rights rendering both the action voidable.”

“I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion. The secret proceeding against me reveals great injustice and shows the government seeks to be above the law, untamed by the just rule of law in my case.” Citing, App. Y, Numbers 8-13.

I am not able to make any of those arguments in a Motion in the Third Circuit. I, and the class of attorneys labeled disabled are denied the fundamental right to the opportunity to be heard on Constitutional defects of originating disciplinary orders in violation of the First and Fifth Amendment Due process and substantive due process components.

The Third Circuit Court prevented me from discussing procedural defects under R.A.D.E. Rule 16. I believe my claims warrant review, but the Court affords none in my case, nor any to the class of attorneys labeled disabled. R.A.D.E. Rule 16 violates the Equal Protections Clause by denying fundamental rights of the opportunity to be heard on Constitutional defects of the originating disciplinary order to a class of lawyers labeled disabled and to me as a class of one.

The Third Circuit Court cut off my electronic filing access for the reciprocal automatic matter 22-8037.

Additionally, the Third Circuit Court, in a separate order, indicated it would not consider any document I mailed in, unrelating to the Petitions it cited under R.A.D.E 16. App B

I admit R.A.D.E 16 (3) permits me to contest the Order, but requires it be contested concerning the material rulings without affording me Constitutional protections.

I, unlike suspended and disbarred lawyers, am not allowed to argue Constitutional and procedural defects. Id.

R.A.D.E. 13(3) further states “by bringing such a proceeding, the [disabled] attorney waives the doctor-patient privilege (and other similar privileges) regarding the disability.” This requires additional potentially embarrassing requirements, to the class of people adjudicated disabled.

I have religious objections to healthcare and mental healthcare. So, this increases a burden upon me uniquely, by potentially requiring I violate my First Amendment right to religious belief to regain my active license, to buy and sell as an attorney, in reciprocal punishment for the exercise of my First Amendment rights of speech, belief, exercise of belief, association and petition. US Amend I.

Under R.A.D.E. 16.5, the Court permits me to argue “that the disability has been removed and the attorney is fit to resume the practice of law.”

However, I am not disabled, and was wrongly labeled disabled as punishment for the exercise of fundamental rights and to cover up the Delaware Supreme Court and its agents’ misconduct. There never was a disability to remove.

The protections under R.A.D.E. R. 6 must be extended to attorneys adjudicated disabled inactive. The discriminatory elimination of Constitutional rights to a class of people labeled disabled, potentially a more vulnerable class is unfair.

The elimination of the Constitutional right to petition to contest reciprocating orders based on constitutional defects under R.A.D.E. R. 16 is unconstitutional as applied to me, and as applied to lawyers labeled disabled. Since, they unlike other lawyers are selectively denied procedural due process regarding Constitutional and procedural defects.

“Even in applying permissible standards, officers of the State cannot exclude an applicant when there is no basis for their finding that he fails to meet these standards, or when their action is invidiously discriminatory, ”by denial of fundamental rights, including the opportunity to be heard. *Schwabe v. Board of Bar Examiners*, 353 U.S. 232 (1957)

This Court held, “A State cannot exclude a person from the practice of law or from any other occupation in a manner or for reasons that contravene the Due Process Clause of the Fourteenth Amendment. ” *Schwabe v. Board of Bar Examiners*, 353 U.S. 232 (1957)

The Federal Court cannot similarly exclude me or the class of attorneys labeled a disabled for reasons that contravene the First and Fifth Amendment component of procedural and substantive due process.

I argue R.A.D.E. R. 16 contravenes the First and Fifth Amendment component of procedural and substantive due process as applied to the Third Circuit, as applied and per se.

The Order below must be overturned, and Rule 16 must be deemed unconstitutional by denying a class of attorneys Constitutional rights afforded to other attorneys, based on the invidious label of disability.

This issue is capable of repetition, yet evading review. *Wisconsin Dept. of Industry v. Gould Inc.*, 475 U.S. 282, 286 n.3 (1986).

The form of loss of First Amendment rights and my property interest in my license without an opportunity to contest a sham proceeding is unconstitutional.

A lawyer's right, my right to pursue the profession of my choice constitutes a property protected by the due process clause of the Fifth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs. I and the class of attorneys labeled as disabled should not be denied the right to petition and the opportunity to be heard afforded to other attorneys disbarred and suspended without a compelling interest necessary and more important than elimination of the First and Fifth Amendment fundamental right to petition.

It is the opportunity to be heard I seek to protect, not the guarantee. If only certain people are protected by the courts there is partiality towards those deemed worthy of justice while the least of these are guaranteed injustice.

IX. Urgency, threat of death or harm to health

My life is in danger. Courts failure to grant accommodations in the form of time to sustain my health due to my unique physical needs have needlessly created a government compelled threat to my physical health. App AA. In two forums I filed pleadings relating to the fact I collapsed and could not stand at the post office because I am not afforded an accommodation in the form of time to care for my health. I certainly do not want to die because judges heartlessly do not desire to be inconvenienced with my defense of Jesus Christ. I plead the right to live on religious grounds as a religious exercise.

My life is in danger. People threw things on my car. App BB. People talked about shooting me as I noted in the attached Facebook post, admissible under present sense impression should anything worse happen to me. Id. DI 9

Both democrats and republican lobbyists who control the other two branches are not pleased with me. App EE. I proposed five articles of impeachment to use for President Trump. Additionally, I filed a lawsuit against the democrats to run for office without violating my religious beliefs by collecting signatures and money to pay the election office's fee. Id. I do not want to be controlled by those who give signatures and money, no longer free to do what is right by unconditionally loving and serving all, not merely those who seek to enslave me. Id. App FF.

Your branch is the only free, impartial not bought branch. by donations, signatures or otherwise. Without preserving your freedom from bias towards regulators, none are free. Even if I am eliminated, please use this case to prevent the elimination of the Courts. Please save these United States, even if you do not choose to save me. I file this in haste, imperfectly to preserve my rights, and to preserve the courts.

CONCLUSION

Wherefore, I pray this Court grants this petition, vacates the order below under and grants any relief this court deems just.

Dated: 1/12/2023

Respectfully Submitted,

/s/Meghan Kelly
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US Supreme Court Number 283696

Appendix Q

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September 12, 2022

Meghan Marie Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

Re: In the Matter of Meghan Marie Kelly
No. 2913 DD3 - Supreme Court

Dear Ms. Kelly:

Your correspondence dated September 3, 2022, has been received and reviewed by Office of Disciplinary Counsel (ODC). ODC will not agree to a stay of the above-captioned proceeding.

If the Order of the Supreme Court of Delaware dated August 10, 2022, is vacated or stayed, please notify me and provide a copy of the order vacating or staying the August 10 Order.

Thank you.

Very truly yours,

Anthony P. Sodroski
Disciplinary Counsel-in-Charge,
Special Projects

APS/rbc

cc: Thomas J. Farrell, Chief Disciplinary Counsel
Raymond S. Wierciszewski, Deputy Chief Disciplinary Counsel

Appendix R

A-4

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,)	
)	No. 119, 2021
Plaintiff Below,)	
)	
Appellant,)	
)	
v.)	
)	
Donald Trump, a.k.a. Donald J.)	
Trump, a.k.a. President Trump)	
a.k.a. President Donald Trump,)	
in his official capacity as President of)	
the United States)	
)	
Defendant Below,)	
)	
Appellant,)	

APPELLANT’S MOTION FOR THE DELAWARE SUPREME COURT TO
 REIN IN ITS ARMS THROUGH ITS AGENTS FROM UNLAWFULLY
 PRESSURING APPELLANT TO FORGO OR IMPEDE HER CASE TO
 PROTECT HER FREE EXERCISE OF RELIGION.
 BY RELIEF IT DEEMS JUST

1. I, Meghan Kelly, pro se appellant, having been granted in forma pauperis relief, move this honorable Delaware Supreme Court, unopposed, 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. I suggest private guidance.

2. My faith in God may appear crazy to others. Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the

government through its agents believes. *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). 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. Organized charity, fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business greed is love. *See Matthew 6:1-5*. Also see, *State ex rel. Tate v. Cabbage*, 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 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.

3. I write to alert this Honorable Court concerning actions by state government agents taken to apparently impede and obstruct my access to the

Courts in this proceeding. I object to such interference, and reserve these issues for appeal, mentioned in part in Exhibit 55, attached hereto, and mentioned below, incorporated herein as if part of this letter, and in my brief, below. Dckt 60 at 63-64.

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

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

6. A representative of the Chancery Court staff misled me into almost missing my deadline to file a notice of Exception. See, Docket 54, December 1, 2020 letter, regarding Due Process concerns, also contained in Docket 90, combined with Docket 36, attached to the notice as Exhibit F- Exhibit 55.

7. The representatives at the Chancery Court demeaned me apparently based on poverty, association or religious beliefs. See, *Id.*

8. I asked the Master for her help. She kindly helped me. Dckt 55, 58.

9. In addition, the ODC impermissibly interfered with this case by contacting Judge Clark, per Judge Clark’s admission.

10. In mid-April, Judge Clark appeared to threaten me at BJ's, a store, located in Millsboro, Delaware, as if I was on trial for standing up for my faith in Jesus, solely based on my exercise of seeking relief in court based upon alleviating the government sponsored burden government-religion has caused on my free exercise of religion in the action below.

11. The ODC and Judge Clark clearly violated or encouraged the violation of the judicial Code of Conduct, by seeking to use their government power to obstruct my case, showing partiality to the Defendant, the President of the United States.

12. "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 (3d Cir. 2015).

13. Judge Clark knew or should have known that seeking to use his cloak of government authority, as a respected, fair judge, to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure violates the Delaware judicial Code of conduct. See, *The Delaware Judges Code of Judicial Conduct*, Canon 1, "A judge should uphold the integrity and independence of the judiciary," Canon 2, "A judge should avoid impropriety and

the appearance of impropriety in all activities,” Canon 3. “A judge should perform the duties of the office impartially and diligently,” Canon 7, “A judge should refrain from political activity inappropriate to the judge's judicial office.”

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

15. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 130 S. Ct. 1803, 176 L. Ed. 2d 634 (2010)

16. “There is no ‘de minimis’ defense to a First Amendment violation.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, 2011 U.S. App. LEXIS 16121.

17. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex County*, 861 F. Supp. 2d 411, 415, 2012 U.S. Dist. LEXIS 67571, *1

18. I will likely continue to suffer government threats by the state if the Court does not help me by upholding the Constitutional limits from state overreach.

19. 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.

20. I am permitted to believe differently than the government through its agents, even if what Jesus teaches seems foolish to the world. 1 *Corinthians* 1:18, 2:14-16.

21. “Government official's conduct violates “clearly established” law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right.” *Id.*

22. I do not wish to have any disciplinary action against any of the government representatives for misconduct. I desire fair access to the courts, without government persecution based on my exercise of redressing a grievance to alleviate the burden upon my free exercise of religion from Government sponsored religious persecution directly caused by government establishment of government-religion and government-religious views.

23. I object to disparate treatment based on religious affiliation on due process, first amendment and equal protection grounds. I object under RFRA too. See, *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020). The Supreme Court in dicta explained RFRA applied to state and local employees and agents, not merely federal officials.

24. I received additional pressure by the arms of this Honorable Delaware Supreme Court on May 24, 2021. I received an E-mail offering alleged help from an arm of the Court, the Delaware Lawyers Assistance Program (“DE-LAP”), from Carol P. Waldhauser, Executive Director, copying a mental health professional, relating to a past request for a waiver of attorney filing fees. Attached hereto as an Exhibit.

25. It was not help to pay the fee. I paid the fee long ago, though I did not receive a response from this Honorable Supreme Court, per my request back in January 2021 or secondary request in February 2021. I certainly hope this Honorable Court did not instigate the abuse by its arms. If so, please desist.

26. DE-LAP was looking after its own interests, which conflicts from mine.

27. 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 BJ Skinner's theories, which most teachers, including myself learned.

28. 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.

29. Carol P. Waldhauser created the appearance of a threat by inaction by requiring a response within ten days.

30. While I believe artificial entities without hearts such as the ODC and DE-LAP, per se behave based on the mark of beast, absence of love, survival, for reward and avoidance of harm, serving greed by exploiting need, not doing good by their love of humanity, but seeking to control, eliminating free will by forcing the entities' will, its interest by threat of punishment, this Court has the power to reign in beasts, aka artificial entities without hearts, organizations, LLCs, corporations and such, with restraint in the form of the rule of law, which teaches love of humanity, not exploitation to serve the beasts' interests, the love for profit and praise at the cost of inhibiting freedom in the form of free will, freedom of

conscience by forced will under the threat of government sponsored persecution by funding such entities or otherwise.¹

31. I have the freedom to chase after God instead of chasing after money at this time in my life.

32. 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 dictates of the state through its agents to worship money, which I believe leads to damnation.

33. I believe business greed 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.

¹ I did not know how bad the world was until I ran office. I think artificial entities without hearts, charities, organizations, not for profits and businesses through alternative entities (“beasts”) tempt world leaders through donations, signatures or support in elections, essentially controlling the leaders to mislead by serving the leaders’ self-interest by serving the beasts at the expense of the people. The entities who appear to control the world through world leaders arguably likely have contacts in Delaware. I have been writing US Attorney General Garland concerning ideas how he may persuade this Court to save the world in other cases, including one to alleviate an economic crash using laws like 18 USC section 666, considering bailouts, grants and tax breaks as bribes, especially concerning the big payouts in 2020. The courts can tame beasts without hearts with the rule of law, since Judges are not beasts or mere puppets of power or mere robots. Judges are powerful because they may choose to reflect the image of God by love for humanity, sacrificing potential profit for people, making many people richer in love and materially, instead of the few. Entities without hearts who seek to get as much as they can for as little as they can will devour humanity, if humanity does not tame it. The heartless entities will seek to control people, if the courts do not take control of them, forcing people to reflect the image of Satan by behaving like heartless beasts too. I hope the Delaware courts will be our world’s hero should an economic crash occur too, saving lives and eternal lives.

34. I am in danger, a different type the bodily harm I will discuss in my brief, albeit I have been visibly shaken up clenching my teeth, and have cried concerning the state attacks related to this motion too.

35. Justice in the courts is a command by God. Amos 5:15. "Justice, mercy and faithfulness are greater commands" superseding concerns relating to costs and convenience. Citing Matthew 23:23.

36. Courts should sacrifice potential profit to serve people, not sacrifice people for the love of profit through entities' unjust gains.

37. Please instruct your arms to stop bothering me or other relief this Honorable Court deems just, and to allow me to pursue my case without government threats.

38. I respectfully request the Court guide its arms through relief it deems just. I suggest correction through loving instruction, guidance to prevent additional government interference in this action. Please help.

39. On an aside, I am crying as I type this since I am reliving the wounds of the past where an arm of the Supreme Court economically persecuted me to protect those with shared interests.

40. While I took the Delaware Bar my ceiling at the dorm caved in with a leak and destroyed my bar materials, I paid thousands of dollars for. I complained to the supreme court. As a result, an arm of the court, the Board of Bar Examiners

punished me and threatened me and made a complaint against me because I asked for help.

41. Where you see smoke, you think fire. I joined RLF on a contract for about \$135,000 a year. I did not get my contract renewed as the law firm participated in my bar admission.

42. Prior to that in law school, I had rats in my apartment the last semester and during bar exams. I complained.

43. Duquesne, a Christian Law School responded by blaming me and hiking up my rent.

44. The press helped me by putting me on TV and the newspaper, but no actual relief resulted, only harm. I was freaked out and emotionally exhausted. There was a bunch of baby rats trying to climb up my bed as I tried to get sleep. I was horrified. I did not pass the bar the first time. I got super high scores the second time and allegedly high scores in Delaware passing on the first try. I should not be ashamed. I am disappointed in the cold heartedness by the officials of a Christian law school.

45. While I was in law school, my brother was also in an accident. I sought permission to travel and take off time to delay my first bar exam, to see my brother, to make sure he would live.

46. Duquesne said yes. But a day or two before the exam I found a note in my box. They changed their mind. They tried to call me. I did not have a phone. I do not buy things I cannot afford. I go without as incurring debt is against my religious beliefs.

47. I took the exam in Civil Procedure, and received my worst grade, and hated civil procedure ever since as a reminder of the cold heartedness of the Christian university.

48. The fact I have a heart to fight heartless beasts, including charities, not for profits, businesses and churches, does not make me weak. It makes me human with the power to reflect the image of God by love, stronger than heartless beasts who seek cold hard cash for survival.

49. My cousin, Peter Conaboy ("PJ"), also was murdered while I was in law school. So, this is all very painful to relive, and to be reminded of by the May 24, 2021 letter.

50. His mother, my Aunt Jackie Conaboy is in the hospital now. She is doing poorly. She may not make it in this life or the next. At PJ's funeral the priest said "hurry it up. I have a luncheon" as people shared stories about PJ. I scolded the priest as I left. "What would Jesus say." My aunt Jackie remembered that. Ever since then, she has not gone to church, and she turned to wine not God for comfort. I do not think she will go to heaven, if she does not turn towards God

for comfort. I pray, but recognize prayers are not enough at times since people have free choice. She may die soon. God’s plan is the same for all. I discern whether people are lost or saved, whether they do man’s plan or God’s. She is not okay.

51. I learned early to turn to God for comfort, not to turn to any imperfect person or thing in this world for my comfort. I am not like the world. I am sad for the world, as I seek to heal it with love, through justice in the courts, shedding light on evil, not celebrating evil as good.

52. While scars remain well beyond our fleeting lives, harming future generations, and relived by new attacks such as the May 24, 2021 attack, this Court can prevent future harm to me by government actors misbehaving by seeking their own power and profit in this case, right here, right now, before it is too late, and additional harm is incurred, lasting beyond the fleeting lives of the perpetrators who act on self-interest, not love.

May 25, 2021

Respectfully Submitted,

/s/ Meghan Kelly
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
pro se, as a party, not an
attorney advocate
meghankellyesq@yahoo.com

EXHIBITS THERE TO

EXHIBIT

55

December 1, 2020

Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

RE: Meghan Kelly v. the President Donald Trump, et. Al.
Case No. 2020-0809- Master PWG

Due Process concerns

Dear Honorable Master Patricia W. Griffin:

I believe I may have received disparate treatment based on my wealth, political affiliation and or religious orientation, and will continue to receive such treatment without your assistance.

The staff in your court appear to be subverting my case, by serving as advocates for President Trump.

I sensed this early on when I was having trouble gaining a copy of everything, pursuant to your kind order granting me one copy. I felt like my case was not treated as a serious matter.

I sensed this when I when I felt mistreated by your staff around October 12, and October 13, and went home crying for days. See Exhibit A, emails, admissible under the present sense exception.

I filed the letter dated October 19, 2020, regarding the fact I am not an officer in this court to address and qualify my position as the party, not a mere attorney in hopes to prevent future abuse.

I am without the insulation or protection of counsel. I am the party. The staff may more freely scold and criticize attorneys without display of improper partiality towards a party.

I sensed this when Arline Simmons misled me concerning your November 2, 2020 as something trivial on November 4, not November 2 as indicated in my letter dated to this Honorable Court dated November 6, 2020, apparently, in hopes I would not seek exception to your rulings.

Then, I realized the court's staff may be scared of messing up with regards to paper filing, and the unique Covid19 amendments the requirements. I believe the Supreme Court is merciful concerning trite matters such as the fact none of us appeared to be aware of the waiver of notary requirements. I applaud the Supreme Court's leadership in safeguarding people's lives more than safeguarding business as usual.

Yet, my suspicions of partiality towards me proved correct. On December 1, 2020, your staff appeared to be attempting to bleed me dry of resources to continue this proceeding by denying me the benefits of the Chancery Court Rule 171 (c)'s authorization which provides in part. "... I

copy of all briefs shall be mailed to or filed with the Register who shall immediately docket them and mail or deliver the original to the Judge to whom the matter has been assigned..." (emphasis intended).

The court's staff appears to be playing the advocate to win the case for President Trump by directing me to mail everything to the Court in Wilmington or pay for gas to drive two hours away despite the fact she is aware of my limited resources. See Exhibit B.

I should not be additionally taxed by unnecessary costs because the court's staff opposes my position.

This case will likely remain alive, with possible interpleading by churches who care more about money than humanity. Under the guise of freedom of religion some churches will foreseeably display whoredom, selling my God for a price too high, costing lives and health to serve their bottom line. An order requiring, I mail everything to upper Delaware is unjust, based on bad faith of the court's staff, intentionally causing me to withdraw my case due by running out my limited funds in mailing costs.

The Court's agents cannot act as the Defendant's advocate by indicating I am not worthy of a fair and impartial case because of poverty that inconveniences the Court, political orientation or political beliefs.

I understand, most people support President Trump down here, and that most people do not think or believe as I do. Yet, I still have the freedom to pursue my unpopular belief, and my desire “not to be conformed to the world,” without government persecution or threat of persecution. Romans 12:2.

I have chosen to confront the most powerful man in the world with endless resources paid by the federal government. That fact does not make my case trivial.

I believe “God chose the foolish things of the world (like me) to shame the wise; God chose the weak things (like me) of the world to shame the strong.” 1 Corinthians 1:27.

Part of what makes this country already great is the impartiality required by the courts, creating an equalizer in fairness, regardless of wealth or poverty, power, position, race, religion, affiliation or place of origin.

Justice is not guaranteed. Yet the opportunity for justice, even by a peon like me against the most powerful man in the world, is. Should I fail, that is on me, not the court. This Honorable Court must allow me to try.

I believe the staff’s behavior is not a reflection on the Court, nor a reflection on you, Honorable Master Patricia W. Griffin. They add a buffer between me and you to prevent ex parte communications.

Yet, the buffer has broken to the point that the floods of injustice may arise without the protection of the court's guidance on its own staff to uphold the integrity of the law.

"To be actionable, claim of denial of access to courts need not allege total or complete denial of access; rather, plaintiffs need only claim that interference with and potential prejudice to right of access to redress in state court rises to level of constitutional deprivation." *In re Cincinnati Radiation Litig.*, 874 F. Supp. 796 (S.D. Ohio 1995).

"Opportunity to be heard is essential requisite of due process of law in judicial proceedings." *Richards v. Jefferson Cty., Ala.*, 517 U.S. 793, 116 S. Ct. 1761, 135 L. Ed. 2d 76 (1996).

Please assure me the protection of due process, without rendering an order displaying partiality to the opposing side, to prevent infringement upon my right of due process in this case.

Respectfully Submitted,


Meghan Kelly, Esquire

Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 993)

Exhibit A

10/15/2020

Re: Thursday afternoon/Meg/3 Original summons/ - Yahoo Mail

Re: Thursday afternoon/Meg/3 Original summons/

weghankellyesq@_inbox

Meg Kelly <weghankellyesq@yahoo.com>
To: Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>,
Simmons, Arline (Courts) <arline.simmons@delaware.gov>
Cc: Meg Kelly <weghankellyesq@yahoo.com>

Oct 14 at 9:20 AM

Hi Arline,

Thank you for responding so quickly. Will do. If anything comes up I will let you know.

Arline, Thank you for holding off on the summons from Friday October 9, 2020 for the civil processor. I did not want you to do it twice with the incorrect amount of days the Defendant has to respond. I explained to the Honorable Court, the Defendants are allowed 60 days instead of 20 in the documents I filed. I alerted the Honorable Master to this in the filings.

Accordingly, I am missing three summonses for the Second Amended Complaint, and one summons and copy of the praecipe for all three Defendants. They have 60 days to respond. I do not believe the Honorable Master Patricia W. Griffin can not make a determination on anything until all three Defendants are served.

I will draft more detailed certificates of service. So Katrina knows what links up with what.

Thank you for letting me know, you need more specificity Katrina.

I did not sleep at all last night (and I always sleep well) and cried this morning after yesterday and Monday too. I would not have filed this case if I thought things would be ok, I do not. I am seeking to expedite this case because I believe people are deceived by the Defendant to be harmed and damned to hell. I am still crying. I thank you for your hard work on this case. It is worth the effort, even if you do not believe I am worth it. I am Katrina. I love and respect you in real life but was so saddened by the way you demeaned me as an inconvenience. I am entitled to a fair impartial opportunity to be heard under the law, despite the required work for the Honorable Court to listen to my words. Justice is not to be earned, bought or bartered for by those with money. It must be granted to the rich and poor alike without bias towards those with money. Otherwise it is injustice guaranteed.

I am still crying. I might need a day to collect myself and refocus my attention on the case at hand. I intend to come in tomorrow morning. I will let you know if I can not make it.

I will draft a more detailed certificate of service for the 3 summonses I will file. So, you know what goes with what.

Thank you.

Love,
Meg

On Wednesday, October 14, 2020, 08:11:11 AM EDT, Simmons, Arline (Courts) <arline.simmons@delaware.gov> wrote:

Hello Meg,
Please come on THURSDAY before 11:00 a.m.

-----Original Message-----
From: Meg Kelly <weghankellyesq@yahoo.com>
Sent: Tuesday, October 13, 2020 8:48 PM
To: Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>; Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>
Cc: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>
Subject: Thursday afternoon/Meg

Hi Katrina and Arline,

I have a CLE scheduled on Friday. May I please come in Thursday afternoon.

Thank you,
Meg

10/15/2020

RE: Monday Meg Kelly - Yahoo Mail

RE: Monday Meg Kelly

meghankellysq@_inbox



Simmons, Arline (Courts) <arline.simmons@delaware.gov>
To: Meg Kelly <meghankellysq@yahoo.com>, Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>

Oct 14 at 3:52 PM

Monday is fine-Can you come before 11:00 a.m. ?

-----Original Message-----

From: Meg Kelly <meghankellysq@yahoo.com>
Sent: Wednesday, October 14, 2020 3:41 PM
To: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>; Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>; Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>
Cc: Meg Kelly <meghankellysq@yahoo.com>
Subject: Monday Meg Kelly

Hello,

May I please come in Monday instead? I am still shaken up. Remember I am behaving as the injured party, not bringing this complaint as an advocate with the insulation of representation.

I think a couple days, may help Attorney General William Barr, Esq. and President Trump too recover from Covid19 too. The Honorable Master can not rule on anything until all 3 Defendants are served to affid notice, or at least attempted notice to all parties. Attorney General William Barr and the US Attorney General agent, the civil process clerk, are deemed the United States, a necessary party according to the rules of Federal procedure Rule 12 3(A).

Arline is wiser than I. She kindly indicated "do you need the United States as a party. I did not know until I looked it up." I am sorry that required I had to amend the complaint. I tend to look things up to confirm, but now I no longer have the ability to easily look things up. Arline thank you for your kindness and mercy.

Thank you.
Meg

10/19/2020

Meg/Sorry Katrina/Meg is not an attorney advocate in this case - Yahoo Mail

Meg/Sorry Katrina/Meg is not an attorney advocate in this case

meghenkellyesq@.../Sent

Meg Kelly <meghenkellyesq@yahoo.com>
To: katrina.kruger@delaware.gov, katrina.kruger@delaware.gov
Cc: Simmons Arline (Courts) <arline.simmons@delaware.gov>,
Meg Kelly <meghenkellyesq@yahoo.com>

Oct 15 at 12:20 PM

Hello,

I do not know I do this, but I have been told I raise my voice when I am upset and passionate. I do not notice it. I apologize Katrina.

When Katrina said I was not allowed to file anything, though I must or it will be kicked out, she behaved like Defendant's advocate, not as an impartial government agent.

When Katrina said I needed a phone when the rules afford lawyer for those without a working phone, it made me feel as if you represented Defendant's interest and the Court's convenience over truth and justice.

You made me feel less than, when you said I should let someone ahead of me on Monday, when I am trying to expedite this case for immediate relief.

The Court's agents cannot act as the Defendant's advocate by indicating I am not worthy of a fair and impartial case because of poverty that inconveniences the Court, political orientation, or religious beliefs.

I understand, most people support President Trump down here, and that most people do not think or believe as I do. Yet I still have the freedom to pursue my belief, and my desire "not to be conformed to the world," without government persecution or threat of government persecution.

I am sorry I need to clean my dirty heart of the sin of fear. It appears I am raising my voice with other people when I talk about pursuing an action to safeguard freedom to worship or not according to the dictates of our conscience, not the dictates of the government, under the threat of government sponsored public or private persecution.

I am not an attorney advocate in this case. I am without the insulation and protection of counsel. I am a pro se litigant. I am the party and not the party's counsel. If I was a mere attorney, an officer of the Court, as opposed as the party, it would be different.

Thank you for understanding. I will work on cleaning my dirty heart of sin. I am sorry Katrina. I am having a real hard time with my winpy high voice. I need to become br ave, and have faith in pursuit of justice in the courts. I have never been so scared in my entire life. I am scared of letting God down, and this Honorable Court down. It is humbling. I have chosen to confront the most powerful man in the world with endless resources paid by the federal government. Yet "...God has chosen the weak things of the world to shame the things which are strong." 1 Corinthians 1:27

I apologize in advance for not having easy access to the law too.

Thank you. Have a good weekend.

Kind regards,
Meg
Meg

Exhibit B

12/1/2020

(1,956 unread) - meghankellyesq@yahoo.com - Yahoo Mail

Fw: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

From: Meg Kelly (meghankellyesq@yahoo.com)

To: katrina.kruger@delaware.gov; arline.simmons@delaware.gov; meghankellyesq@yahoo.com

Date: Monday, November 30, 2020, 01:29 PM EST

Hi Katrina,

May I please drop them off to your court as the rules allow? The cost of continuously mailing verses dropping off are prohibitive. It is stressing me out, and I am already at risk of a heart attack. My blood pressure is higher than expected. I didn't know my heart was hurting because my blood pressure is high, 138 over 87, most recently. That is why my heart hurts when people say I am not a Christian. It upsets me to the point it may eventually kill me.

Thank you,
Meg

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>; Simmons, Arline (Courts) <arline.simmons@delaware.gov>; McKinnon, Brenda (Courts) <brenda.mckinnon@delaware.gov>; Boyer, Sheila (Courts) <sheila.boyer@delaware.gov>

Cc: Bauer, Cecelia (Courts) <cecilia.bauer@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>

Sent: Monday, November 30, 2020, 01:14:02 PM EST

Subject: Re: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Hi Katrina and Sheila,

Since I have very little money to mail, it is more plausible for me to adhere to the rules by dropping it off to Sussex County. Thereby, I seek the benefits of the rules, without waiving them.

Thank you for your suggestion, and understanding.

Have a good day.

Very truly,
Meg

On Monday, November 30, 2020, 12:57:56 PM EST, Boyer, Sheila (Courts) <sheila.boyer@delaware.gov> wrote:

Thank you, Katrina –

You have detailed everything perfectly. Since Vice Chancellor Fioravanti is assigned to this case to hear the Exceptions to Master's Report part of this case, anything having to do with those documents, or correspondence to Vice Chancellor Fioravanti, need only be sent to his Case Manager, Brenda McKinnon – and/or to the Register in Chancery in Wilmington – mailing address is shown below with my signature block.

12/1/2020

(1,308 unread) - megkellyyeeq@yahoo.com - Yahoo Mail

Sheila

Sheila L. Boyer

Judicial Case Management Supervisor

Register in Chancery Wilmington

500 N. King Street, Suite 11600

Wilmington, DE 19801

302-255-0552

From: Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>
Sent: Monday, November 30, 2020 12:48 PM
To: Meg Kelly <megkellyyeeq@yahoo.com>; Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>;
McKinnon, Brenda (Courts) <Brenda.McKinnon@delaware.gov>; Boyer, Sheila (Courts) <Sheila.Boyer@delaware.gov>
Cc: Bauer, Cecelia (Courts) <Cecelia.Bauer@delaware.gov>
Subject: RE: Meg v Trump Case 2020-0909 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Hi Meg,

Just to make sure I got this correct. I received the Letter to Vice Chancellor Fioravanti asking to exceed the word count and also the certificate of service in today's mail. According to your email below, you also sent BOTH documents to the Register's Office in New Castle County. Is that correct? I am including in this email Brenda McKinnon, the case manager to the Vice Chancellor, and also Sheila Boyer, office manager, in the event that Brenda is out of the office. There is no need for both counties to docket the same thing. It currently is not on the docket. I will go ahead and efile both documents. ALSO, you need to wait and see how the judge rules before mailing the brief for anyone to efile.

From this point forward, it is best to send the filings to just *one office*. Since this is now assigned to a judge in New Castle County, mail the documents upstate and bypass the Sussex County office altogether. Otherwise it gets too confusing. If Brenda or Sheila feel differently, they will advise in this email chain.

Thanks,

Katrina

From: Meg Kelly <megkellyyeeq@yahoo.com>
Sent: Monday, November 30, 2020 12:15 PM
To: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>; Kruger, Katrina (Courts)

12/1/2020

(1,956 unread) - meghanallyseo@yahoo.com - Yahoo Mail

<Katrina.Kruger@delaware.gov>

Subject: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Good morning,

I hope you are safe and well.

I wanted to give you a head's up. On Friday, I mailed the attached letter requesting permission to exceed the Chancery Court Rule 171(f) Rule word limit for briefs and the related certificate of service to Defendant Barr.

Could you please confirm receipt, once it is docketed?

I see in under Rule 171(c) that I merely have to drop off the brief to the Court, and the Court will mail it to the upper DE Vice Chancellor. This is weird for me. I am learning it is unusual for you too. I really appreciate your time and assistance even more. Thank you.

I actually mailed the letter and the certificate of receipt to the upper Delaware Court and your court too. So, you may not have to mail what I sent if he confirms receipt or docketed it first. Sorry for mailing it to both courts.

Thank you. Have a great day.

Very truly,

Meg

October 19, 2020

Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

**RE: Meghan Kelly v. United States, 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, No. 2020-0809- Master PWG
Plaintiff Not officer of the Court/Economic Crash/Forum**

Dear Honorable Master Griffin:

Thank you for taking the case.

I am not an attorney advocate in this case. I am without the insulation and protection of counsel. I am a pro se litigant. I am the party, not the party's counsel. If I was a mere attorney, an officer of the Court, as opposed to the party, it would be different. Lawyers are permitted to talk to judges, but not on matters relating to matters, ex parte. I am not allowed to talk to you ex parte period.

The court's staff adds a buffer, and are not the Judge on the case.

It is strange for the staff, and for me. For instance, I could not share the rules that required 60 day notice instead of 20 days notice to the staff ex parte to give to you, even though I had them in my hand, and the staff kindly said she could take them.

Instead, I must communicate with the defense counsel simultaneously, electronically, or by mail while speaking directly to this honorable Court.

I do not know whether this case will remain in this Court or be removed to federal Court. This area heavily supports President Trump. One of Defendant's biggest campaign contributors allegedly lives in Sussex, and Delaware's liason for President Trump, Rob Arlett, lives in Sussex.

Although I am cognizant of the pro Trump atmosphere in this county, I have faith in the fair impartial rule of law by this Honorable Court.

The federal courts are more of a concern for me. The President's sister presided as a judge in the Third Circuit until recently. In addition, the President placed two Third Circuit judges on his list of potential nominees for Supreme Court, creating a concern that the federal judges may be biased toward their colleagues' potential nominations at the death of the next Supreme Court justice, Justice Hardiman and Justice Phipps.

I believe this Honorable Court, from the smallest state, has more power to save the country than the Supreme Court.

This is the corporate capital of the globe.

The biggest government expense globally is healthcare. (See the web site cited in Second Amended Complaint ("SAC"), Count 234). The US spends more money on social security and healthcare than any other sector.

That fact is often hidden by discretionary charts, instead of mandatory spending charts. The US now must pay out more.

The country and the globe have the biggest bill in the history of the world that has fallen due, healthcare and retirement for the baby boomers. Those who value money more than humanity are seeking to get out of paying this earned and owed debt, by bad business. Bad business, made to fail, made to bail out or bankrupt as directors continue to collect hefty salaries and potential bonuses, should not be rewarded by the government for the profit of the few at the expense of the many. (See, SAC, Counts 229-286)

Directors have the power to artificially inflate stocks through stock buy backs. Entities may resell worthless debt in bankruptcy remote entities into infinity while creating the illusion the economy is above water. I used to draft these bankruptcy remote entities at RLF, Delaware's largest home-grown corporate law firm.

With regard to business bailouts and business incentives, creating artificial debt and charging interest to give to businesses to enslave the people to desperate conditions to require the people pay debt back is the sin of inequity and oppression, arguably violating the 13th Amendment by creating wage slaves, or forced volunteering.

Creating jobs is not helping the people. (Sec, Romans 4:4. "Now to the one who works, wages are not credited as a gift but as an obligation.")

Creating jobs is not a gift.

It is exploiting the people to serve those who already profited at their expense with bail outs and incentives, under the deception of doing people a favor by employment.

Soon we will see entities exploit people in a different way only to gain praise by those they oppress, by the elimination of welfare such as social security and medicare, and replacing it with charity violating Matthew 6 misleading people to hell.

This Honorable Court is the only Court in the world that can prevent a global economic crash, while saving government pensions, retirement, social security, lives' savings and Medicare by cutting through the corporate veil of entities to hold those people, directors or otherwise, responsible for made to fail, made to profit from, bad business.

Misleaders and deceivers exacerbate desperate conditions to exploit those they are charged to serve for self-gain. Leaders look after those they serve by alleviating desperate conditions.

This Court is the king of corporate law. Now we need this Court to be a servant leader by slicing the ill gained fat of a few to save the many.

Years ago, I negotiated for a really cool lawyer tool either from Westlaw or Lexis that gave me people and entity's information, including people's social security numbers, except the last two, which is scary because you could go upstairs in the Superior Court and get the last two numbers for Defendants.

The source provided relationships with other people and entities, including entity information in other countries relating to entities here.

Lawyers now have the means to cut through entity shells. The Court is powerless to save the world if lawyers do not have the courage to ask.

I am grateful for the opportunity to be heard.

Please find additional hearing exhibits, to include with the exhibits to the complaint, and a filing list.

Thank you,


Meghan Kelly

Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939
(Words 1000)

SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org)
To: meghankellyesq@yahoo.com
Cc: emkiesel@aol.com
Date: Monday, May 24, 2021, 11:58 AM EDT

Meghan:

Please find attached a self-explanatory letter.

Please contact us within the next 10 days regarding it.

Thank you.

Carol

Carol P. Waldhauser, Executive Director
The Delaware Lawyers Assistance Program
(DE-LAP)
405 N. King Street, Suite 100B
Wilmington, DE 19801
(302) 777-0124
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-Carol P. Waldhauser, Executive Director

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Lawyers Assistance Program

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MAY 24, 2021
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE. 19939

CONFIDENTIAL

Dear Meghan:

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

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

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

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

Very truly yours,

Eleanor M. Kiesel, 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

Appendix S

A-5

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,)	
)	No. 119, 2021
Plaintiff Below,)	
)	
Appellant,)	
)	
v.)	
)	
Donald Trump, a.k.a. Donald J.)	
Trump, a.k.a. President Trump)	
a.k.a. President Donald Trump,)	
in his official capacity as President of)	
the United States)	
)	
Defendant Below,)	
)	
Appellant,)	

APPELLANT’S MOTION FOR THE DELAWARE SUPREME COURT TO REQUIRE THE RECUSAL OF THE HONORABLE CHIEF JUSTICE COLLINS J. SEITZ, JUNIOR IN THIS MATTER

1. I, Meghan Kelly, pro se appellant, unopposed, having been granted in forma pauperis relief, move this honorable Delaware Supreme Court, unopposed, move to recuse the Honorable Chief Justice Collins J. Seitz, Junior (“Chief Justice Seitz”) from participating in review of my case, requiring delegation to the other honorable Justices.

2. On about May 25, 2021, I sent the honorable Court *Appellant’s (unopposed) Motion to guide or reign in the arms of the Delaware Supreme Court,*

or for other relief this Court deems just, (the “motion”), incorporated herein as if included in the first instance. I suggested private guidance. Motion at 1, 37, 38.

3. One of the allegations in the motion was concerning De-Lapp’s response to a request for a suspension of bar fees to serve De-Lapp’s purpose not to help to pay any fee since I paid such fees. Motion at 24 -30. Attached please find my receipt of payment of the Bar registration fee, incorporated as an exhibit, as if expressly stated herein.

4. I attached the May 24, 2021 attack letter as an exhibit to the motion, and incorporate it herein as if included as part of the motion.

5. In the May 24, 2021 attack letter, Carol Waldauser and Eleanor Kiesel state, “We understand that you may be experiencing some financial difficulties with regard to license fees.”

6. The only person who knew I made a request for suspension of Attorney Registration of license fees is Chief Justice Seitz, since I made the request to him, and Mark Vavala.

7. I reached out to Mark Vavala (“Mark”) per the emails, attached herein and included and incorporated herewith as if alleged as part of this motion (“Emails”), admitted under the state of mind exceptions, belief and admissions. See Exhibit, the Emails.

8. I turned to Mark for guidance, as he has always treated me as a judge should, with respect regardless of poverty, religious belief or association, as to requesting relief for attorney registration fees.

9. In the past I turned to Mark when he was a commissioner when Cathy Marshall, the former Supreme Court Clerk treated me with great cruelty and disregard for humanity for cost and convenience, reflecting the image of Satan with regard to unbending rules and penalties regarding the rather unsafe requirement of registration online and by required use of emails during a heightened time of increased threats to electronic hacks.¹

¹ I am trying to persuade US Attorney General Garland to close the back doors on electronic devices President Bush Junior opened up under the guise of safety from terrorism. Bush opened the door to economic, speech and privacy attacks, making the entire globe less safe, especially with regards to health data, health insurance hacks and systems in recent years. Our information is more easily manipulated making us believe we are safe when the pandemic may not be waning as much as suspected. Please note, worldometer has not been reporting all states in its data but has excluded about ten states every day for the past two weeks. I suspect it is being manipulated, hacked, to market the vaccine as working better than it is. I have checked worldometer every day for over a year. They included most states every other day. This is strikingly concerning to me. See, Dckt 71, Exhibit E, Exhibit 26, copy of the web site worldometer, to show healthcare is the biggest global money maker and expense.

Bush sold our freedoms for money by opening the door to those who will kill, steal and destroy or diminish freedoms and lives to gain more material gain. Freedom is not for sale. People are not for sale, to those who require they pay for freedom. People are priceless not price tags, worthy of protection by this Court. Throwing money at a problem or grants is never the solution. Neither is money given to government agencies without strings attached. The spend it as you see fit or lose it provisions reward waste. Strings attached to laws must be tied with all government money offering guidance for good not evil greed, the mark of the

damned. The desire for more government money for government partnered entities under the guise of charity or otherwise, including churches, is the problem. Business greed, to use for the study of things, science to manipulate to gain grants or business profit for something different or for a different fix instead of removing the problem should end. Entities are rewarded with more money by not resolving the problem. Government must fund itself, not pay bribes to entities which per se try to get as much as they can for as little as they can. Then, such entities may supplement with fundraising and charity which I believe damns people to hell. Schools, sports and the post offices would be fully funded if the government paid bills instead of bribes. Children learn to go the way to hell by learning early to rely on associations and organizations, artificial entities without hearts, that run on the mark of the beast to represent their interests, instead of choosing to use their own brains to think, to care, to know, to love, individually and specially, as the treasure they are. We lose treasures to hell. Children are forced to fundraise for sports and schools which will damn them to hell should they not unhardened their heads and learn such evil is bad, all to pay bribes of government agents to serve their interest. Property taxes should not be increased to fund government bribes, thereby creating disparate treatment by zip code, based on home values in violation of the Equal Protections Clause applicable to the states via the Fourteenth Amendment, with no rationally related purpose. The government would decrease waste, create a more fair, equal and just union if government employees, including Presidents and law makers, did their jobs instead of exploiting tasks to serve government agents personal interest including but not limited to getting out of work or liability, while arguably creating artificial debt in violation of the 13th amendment to serve greed not need, by paying entities to profit off of its government duties at a greater bill to its people in terms of not merely monetary loss but loss of constitutional freedoms. It is an abomination. The government itself is a heartless beast should the agents not use their power to individually use their free will, their brains, to think, to care, to know, to love people, instead of acting as heartless robots going through mechanical motions of a system. Then brainlessly blaming the system, instead of themselves, for problems they cared naught to address.

I digress, government funding for science is bad and a black hole, that should be closed from sucking the life blood and souls out of humanity by indentured servitude to feed unsatiable greed by entities without hearts. Just laws, just policies and justice in the courts is the solution to close the black hole. The government rewards businesses for made to break, made to repair and replace products, polluting in the production and polluting with replaced parts and products in the landfills. The US through its unjust decrees, including but not limited to the UCC, tax code wrote offs and insurance laws is the reason why the

world is so polluted. China would not make made to break, service and replace products if our courts and laws did not reward such, instead of made to last goods, decreasing polluting in production and in parts. Money is never the solution, since it rewards misbehavior, to create the endless lust for greed to make something different, or use of a product for a different function, not made to last, not made to work. Science is the study of things. When the pupils, doctors and scientists declare themselves to be the masters of the universe on a subject, the experts, or knowing the answers, they are per se stupid, and defeat science. Science, after all, is the mere study of things, not the master of things as defined by the scientific method with built in recognized uncertainties called variables, unknown and known. Meaning possible error, not knowing everything, is declared as part of the scientific method. Learning is good, but manipulating data while using good science, retrieved from tests for self-gain, not knowledge, is deceptive and wicked. Our government appears to be partnered with private industries, not for profits, businesses, and churches, by bought or bartered for bribes, in exchange for loyalty or backing of elections, paid with money taken from being used for the people's need, government infrastructure, not Biden's bad plan either, to be used to pay entities to perform the government's job because the government employees evade responsibility of working and blame for expenditures and plans not working, grants and bailouts to exploit the problem to waste money and cause harm to the world for self-gain, by creating industries to profit off of the problems instead of correcting the problem by making the world more safe by closing the back doors in electronics, including but not limited to making lawyers money by adding an unnecessary additional field, insurance companies, fields for miners who sell our data, anti-virus software companies. I am still brainstorming constitutional and criminal theories to persuade the US AG Garland to save us regarding foreseeable looming threats not by people but by entities without hearts, businesses, LLCs and such, by protecting our freedom of speech without government sponsored or encouraged threats against privacy or speech, and a potential 13th amendment argument regarding artificial debt which is a sin against God in the old testament especially, called inequity and will damn the perpetrators to hell despite their stupidity and ignorance. See, Matthew 13, Hosea 4:6. It is no small matter. It is a matter of heaven and hell. The Bible teaches people go to hell for misunderstanding evil for good and good for evil. Not knowing can kill you eternally. You have to care to think, care to know, care to love to escape the fire of the second death at the resurrection of the dead the last day. You must use you free will, your brain, not your belly, meaning your desires. *Philippians 3:19*, "Their end is destruction, their god is their belly (meaning their appetites, their desires), and they glory in their shame, with minds set on earthly things." I argued

that Trump does not use his brain, but is reigned by his desires, the mark of the beast, the whore, the damned, the mark sadly most of humanity has should they not erase that mark before it is too late and they are dead. See Dckt 60 at 21,94,123, 124, 413. Trump is reigned by desires, emotions, instead of laying down his desires, to care to think to love others, by sacrificing to self. I am pointing this out to confirm believe not using your brain to think, to care, to love, is sin.

As a licensed teacher, previously substituting in the schools, I tried to teach kids they were loved and respected no matter whether they failed or succeeded, and to love and respect one another regardless as to whether others succeed or fail. I taught them to think for themselves, instead of writing what they thought I wanted to hear. I taught them their diverse unique view made us all smarter, by shedding light on a different perspective. I tried to teach kids the way to heaven young by Jesus's new command in John, to love one another, without violating the separation of church and state, without using God's name or bible verses in vain. I am pointing this out as I try to live my faith, live my religious beliefs by doing the will of God, through understanding Jesus's words. I believe Jesus is not kidding. I also have ideas on how Attorney General Merrick Garland can safeguard the right to vote, and eliminate the temptations for law makers to create unjust decrees and policies by removing three temptations to do so, eliminating money in politics, ending entity and private backing with money, by allowing the people to more equally and freely, not by purchase of support or opposing a candidate by the only equal, fair, free form, the vote.

Our laws fund grants for science that serve greed, the bottom line, not learning or truth to improve societal conditions. Our tax laws, grant policies and other laws increase temptations to make made to break, made to replace, polluting in the production, and polluting by throwing away replaced parts and products in landfills into infinity, to gain more money by selling replacement parts or products. More grants are given out for some different research. Greed for money is rewarded, driving out love for humanity leading to exploitation of the people and the environment, and I believe damnation in hell.

Additionally, our health care harms health to make people feel better, by feeling nothing, or by masking the ailment, often inhibiting people's faculties, their ability to use their free will, their brain, their mind, I believe guaranteeing their damnation in hell. I believe eternity is determined at the last day of your life. (See, Docket 77, Exhibit F, Exhibit 43, Article I drafted and factors relating to my passion to improve healthcare, to care for the sick and elderly's health, not destroy health by comfort care, eliminating the pain by causing patients to feel nothing, like vegetables, often inhibiting their free will which I believe they need to use to go to heaven, likely misleading the sick and elderly to hell, which breaks my heart, 1.

10. Mark is not hard headed, hard hearted or hard handed. He understands the rules are there to serve humanity, not exploit humanity for the cost

Coastal Point, Guest Column, *Representative candidate says health is wealth*, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District, 2. Document, *“Your Health is your Wealth You are Priceless. Not a price tag!* Kelly seeks Federal Consideration of Health Care Proposal, 3. Meghan Kelly’s teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner’s. I also am licensed to teach health so I know something about health. 4. Meghan Kelly’s redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law. 5. Meghan Kelly’s redacted undergraduate college transcript to show she took relevant courses related to

- a. History of Western Medicine
 - b. Economics
 - c. Medieval Philosophy
 - d. Psychology courses
6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others.)

Drugging the elderly and sick people up so they cannot use their free will to choose to think, to care, to know, to love removes their freedom of conscience to choose the way to eternal life.

It is healthcare, not comfort care, deceiving people to believe you are healing them only to be killing them in this life and the next by concealing pain. At this time, I may not have standing with these unrelated issues, but the Attorney General may have standing down the line. It is noteable, about 33 billion has been misused for years via NIH for bad healthcare that cares less about patients’ health and more about entities’ wealth.

Without protecting freedom of conscience, none are free, none have liberty, all are controlled by the forced will of heartless beasts, organizations and entities, even government, to serve what I argue is the mark of the beast, business greed. We must allow our judges to use their brain, their free will too, to think, to care, to love, instead of robotically adhering as troops in a war, where they no longer lead but are misled by heartless beasts that rule over them.

and convenience by those who wield government power. See *Matthew* 23:11, regarding Jesus's claim leaders are servants. I believe servants of self are misleaders and deceivers, who exploit those they are charged to serve to serve those who serve them thereby serving themselves, reflecting the image of Satan, aka children of the devil not choosing to be saved from the fire the last day by laying down their desires to care to love those outside their own, specifically those who inconvenience them, and their greed by need. See, *John* 8:47, 1 *John* 3:10-11, *Acts* 13:10, *Matthew* 13:38, regarding children of devil.

11. I thought I sinned against God by forgetting to look after Mark's daughter, an attorney within the arms of the ODC. I thought Mark's kid may have lost her job at the ODC, with the news of a new hiring at the ODC, because her father helped me in the form of guidance with regard to requesting a suspension or waiver of attorney fees from the Honorable Supreme Court by official request to Chief Justice Seitz. See Emails.

12. I realized the only two people on the planet aware of my request for the waiver are Chief Justice Seitz and Mark Vavala per that revelation in the E-mail. See Emails

13. In my horror and great sadness, I confronted Mark to determine whether he "threw me under the bus." Citing Emails. I quickly confronted him to determine the worst possible scenario to eliminate any doubt that may tarnish a

professional relationship based on mutual respect for the dignity of all, even one another.

14. I tested him. Mark did not instigate the ODC and DE-Lapp attacks. See Emails.

15. Besides passing the test, I trust Mark Vavala as a former judge, a commissioner, without partiality based on self-interest. I sought Mark's help for years to gain his wisdom and kind guidance. He is smart and wise, and unafraid of tough questions, because he answers honestly with integrity, even with the honest response, I don't know.

16. The conclusion Mark Vavala was not the perpetrator of potential abuse me, led me to determine that Chief Justice Seitz may have instigated the abuse by De-Lapp and the ODC.

17. The interest for fees for an arm may have tarnished Chief Justice's vision as I noted in my motion, the Supreme Court itself may have instigated the abuse. Motion at 25.

18. Far worse, the Chief Justice may have instigated attacks by the ODC and De-Lapp discussed in my motion because my second request relating to waiving attorney registration fees is based on and intertwined with religious arguments in violation of my free exercise and the RFRA which applies to state agents too, including judges and judges' agents, its arms, ODC, De-Lapp, and their

agents, foreseeably impeding and obstructing my access to the Courts in this proceeding.

19. I must correct my allegation at Motion at 25. I was blinded by my desire to persuade this court to save the world by saving me in my case, and possibly other matters, even if the court does not want to. Jesus says if we believe we can move mountains, we will move them. Citing Jesus, Mark 11:23. I believe I have an opportunity, not a guarantee, that I may move a mountain by moving this Court's justices' hearts to be our heroes. Mountains after all means impediments on our hearts, temptations to sin by comfort, costs and convenience instead of doing what is right. *Id.*, (See, *Luke* 8:10. Jesus speaks in parables so only those who seek his will instead of their own or the mere will of man understand what Jesus says by mountains and in general. Others do not choose to use their brains, their free will, to understand God's will, God's plan which is love. They, instead, willfully are blinded by worldly temptations and do not use their brains to think, to care to know, to care to love in truth, not lust, not covetousness based on lies.)

20. I forgot, this court did answer my first request for a suspension of fees relating to attorney registration based on unemployment or financial impediment. I am including the response attached to and incorporated therewith as an exhibit. See, the Court's response attached hereto.

21. In a letter dated February 2, 2021 the Court responded, “The Court acknowledges receipt of (my) letter dated January 7, 2021, wherein (I) request that the attorney registration fees for lawyers out of work due to the pandemic be waived.

22. I responded per the attached February 5, 2021 letter, attached hereto and incorporated herewith in toto, as an Exhibit. I provide in part:

“Thank you for the February 2, 2021 letter in which the Court indicated it would consider requests for waivers of attorney fees on a case by case basis, by formal request.

My concern, is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the State's agencies, even the courts via the 14th Amendment, by 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 attorneys 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.

On an aside, the reason why I became a lawyer is my faith in Jesus Christ. Justice in the Courts is a command by God. See Amos 5:15. Jesus Christ

taught that “justice, mercy, and faithfulness” are more important commands. Matthew 23:23.

23. In my second request relating to attorney fees, dated February 5, 2021, I go on to discuss more religious concerns therein.

24. I note, Mark Vavala in the Email exhibits noted 5 other attorneys reached out to him regarding attorney fee cost issues.

25. Imagine how many other lawyers may be struggling due to the pandemic, possibly catching the sickness or caring for a loved one or merely life’s struggles unforeseeably hampering lawyer’s capability to pay the Registration fee.

26. Such case by case application creates disparate treatment by the hidden reign of lusts or likes as it suits the judges interests, not the impartial rule of law, without selective application.

27. The Court should create a form that permits lawyers without the ability to pay to waive such fees, to automatically apply for waiver based on debt or financial burden, and such waivers should be freely given, instead of enslaving already financially desperate people with additional pressure.

28. No one is above the law. No one is below the law, not even judges who administer the laws. Judges must maintain their independence from self interest, and their appearance of independence.

27. “The Founders rejected the medieval myth that sovereign (rulers, even judges and Presidents) are anointed by God to rule over them. The Founders laid a

new foundation for our country, based not on the lie of divine right, (but by free choice, the free will of the people based on the universal belief that) all people are created equal and all just powers are derived from the consent of the governed.

They changed the very source and nature of Law. Law does not emerge from the mouth of a king but rather the votes of the freely chosen representations of the people,” with limited, not absolute power, limited by the Constitution by the Courts. Citing, Duquesne Lawyer, *The Rule of Law, the Constitution and Democracy*, by Wilson Huhn, Professor of Law, Spring 2021 Edition.

28. Partiality and the appearance of impartiality must be maintained in my case to protect the integrity of the courts.

29. I seek to protect the judiciary.

30. To maintain the integrity of the three branches of government.

31. In this United States, the Founders created checks and balances to prevent and fix branch overreach. The fact a check is made, means the system is focused on maintaining a more equal, fair, just union. Humans with hearts are in control and in charge of choosing to maintain, and service the checks on the executive, judicial and legislative branches, like a car in need of oil to run better. People must choose to use their brain to care to think, to care to know, to care to love humanity, instead of comfort, convenience and cost by avoiding tune ups in our system of government.

32. The fact I seek correction will not prevent me from seeking protection of the same system I am seeking to tune up through law suits, to prevent the engine of our nation from failing us, the impartial rule of law.

33. The Courts can uphold the integrity, encourage faith in the system by having the humility to understand it is run by imperfect people in need of guidance through checks and balances, the executive branch, the legislative branch and even the judiciary.

34. In addition, my little cousin, Ikey Adams, a family member, is a partner in Sidley Austin, in DC, where Chief Justice Seitz's daughter appears to work too.

34. These two issues, as to who instigating the government threats via the ODC and De-Lapp, and the familial relations, create the appearance of partiality, or bias that may blemish a rather historical case, should this Court allow me to go forward with arguments.

35. The President(s) need the court's heavy hand of loving guidance to reign in the Presidents' abuse and misuse of power and government funding by dissolving the establishment of government-religion. President Bush Junior, President Obama, President Trump, and President Biden all misbehaved, and misbehavior will continue well past their fleeting lives, should this court fail to declare the Presidents are not above the Constitution. Sovereign immunity seems

to be waived for RFRA claims per the Supreme Court against officials, including the President. *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020)

36. I respectfully request that the Honorable Chief Justice be recused from deciding this case.

May 28, 2021

Respectfully Submitted,

/s/ Meghan Kelly

Meghan Kelly

34012 Shawnee Drive

Dagsboro, DE 19939

pro se, as a party, not an

attorney advocate

meghankellyesq@yahoo.com

EXHIBITS THERE TO

Transaction Receipt from Delaware Supreme Court Attorney Registration for \$353.00 (USD)

From: Auto-Receipt (noreply@mail.authorize.net)
To: Meghankellyesq@yahoo.com
Date: Saturday, February 6, 2021, 01:38 PM EST

Order Information

Description: Annual Registration [a7f2e41f-a8bd-4e7b-bfab-9d5f3858b75f]

Billing Information

Meghan Kelly
19939
Meghankellyesq@yahoo.com

Shipping Information

Total: \$353.00 (USD)

Payment Information

Date/Time: 6-Feb-2021 10:38:16 PST
Transaction ID: 62839723216
Payment Method: Visa xxx9775
Transaction Type: Purchase
Auth Code: 748294

Merchant Contact Information

Delaware Supreme Court Attorney Registration
Wilmington, DE 19801
US
teros@doolegal.com

Re: Nick of time response/Glad your kid is ok
Re: Your kid/meg worried

From: Meg Kelly (meghankellyesq@yahoo.com)

To: mvavala@dsba.org

Date: Thursday, May 27, 2021, 02:19 PM EDT

Thank you Mark.

Please remain uninvolved, as I might have to seek further action, and state agents may get in trouble. Please remain uninvolved, even with your child.

I am grateful, she has her job.

This is a serious matter.

Very truly,
Meg

On Thursday, May 27, 2021, 01:24:20 PM EDT, Mark Vavala <mvavala@dsba.org> wrote:

Meg, I won't be involved in whatever transpires. As for my knowing your situation, there have been at least five other members who have approached me since COVID who needed assistance in some form and were in financial difficulties. I didn't refer anyone who contacted me to either ODC or DE-LAP, so I really don't know anything more.

Again, you will remain in my prayers.

Mark

Mark S. Vavala, Esq.,

Executive Director,

Delaware State Bar Association

405 N. King Street, Suite 100

Wilmington, DE 19801

(302) 658-5279 (office)

(302) 658-5212 (fax)



www.dsba.org

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Thursday, May 27, 2021 1:12 PM
To: Mark Vavala <MVavala@dsba.org>
Subject: Re: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Mark

You are the only one in the world, other than the Supreme Court who knew of my waiver. I am disappointed. I sought relief from the Delaware Supreme Court to make both the ODC and DE-Lapp desist. Please refrain from participating further. It is in the Supreme Court's hands now, whether my order will be granted or denied.

Thank you,

Meg

On Thursday, May 27, 2021, 12:10:15 PM EDT, Mark Vavala <mvavala@dsba.org> wrote:

Hi Meg. I don't know what you are referring to. I didn't submit your name to any ODC/DE-LAP matter at all. My correspondences with you have always been cordial. I saw the letter you sent as a copy in your last email and that was the first time I saw DE-LAP had contacted you. Carol and I have a good working relationship and I respect all she does to help out attorneys, but she keeps her matters confidential from me. If it is something else I did, please let me know as I take seriously any accusation that I threw someone under the bus. I know how hard you work and how passionate you are about your issues.

That being said, if DE-LAP reaches out, then someone did suggest you needed help and I encourage everyone to go that route rather than having ODC get your case. Carol is confidential and has helped a lot of attorneys...not just those who need help, but those who have been referred unnecessarily and having her in your corner is great. She works tirelessly to make sure that people don't run into trouble.

Again, though, I see that as your personal right to make that choice.

Please take care,

Mark

Mark S. Vavala, Esq.,

Executive Director,

Delaware State Bar Association

405 N. King Street, Suite 100

Wilmington, DE 19801

(302) 658-5279 (office)

(302) 658-5212 (fax)



www.dsba.org

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Thursday, May 27, 2021 8:34 AM
To: Mark Vavala <MVavala@dsba.org>; Meg Kelly <meghankellyesq@yahoo.com>
Subject: Fw: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Mark,

Maybe you threw me under the bus for self interest because I asked for help in the past? I am disappointed.

Please do better by refraining from participating in burdening my first amendment freedoms in my suit, my free exercise of religious beliefs, freedom of conscience from substantial burden by persecution by the forced will of the state through its arms to serve money and material gain, not good by love and respect for humanity, instead exploitation to serve self interest by the mere fact I choose to live God's will

Thank you.

Meg

— Forwarded Message —

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Mark Vavala <mvavala@dsba.org>

Sent: Thursday, May 27, 2021, 07:55:17 AM EDT

Subject: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Hi Mark,

Thank you for writing back as I was going to draft something to look after your kid.

I sent a motion for the supreme court to rein in its arms. I actually retained the new ODC guy in a case as an arbitrator. He should know better than to unlawfully interfere.

I am reviewing a slew of executive orders where I see Bush Junior, Obama, Trump, and Biden all misbehaved. In particular Bush Junior talked about deregulating obstacles meaning the free exercise clause in 3 or more of his orders to pay churches to perform government work in a whored, bought or bartered, bribed union of church and state to essentially whore churches to the state, the blasphemous backing by buying the appearance of backing of God. This is an abomination.

I digress, Biden misbehaved in his Feb 14 executive order by talking about preserving the free exercise clause while destroying the same by continuing to purchase churches bought, bartered for, bribed, backing not free but bought, for services to perform government work, causing inefficiencies guaranteed. The churches create the illusion of charity but they serve business greed and supplement with fundraising which as you know I believe damns people to hell as not true charity by teaching deception as truth. Business greed is not true charity per Jesus Matthew 6:1-5, but is the mark of children of the devil, the beast, should they not wash away such inequity and be made clean.

The root of the religious dissent we have seen in our country in recent years is the love of money not the love of any God. Trump merely watered it, allowing it to pierce through the surface with unholy weeds. (biblical reference weeds). I see federal servants speaking of global war, using my God as Mickey mouse mascot for war profit, exploiting the pandemic. That is not okay. The courts are my hope for a hero to correct and prevent harm. They can make Biden behave too. They will be in charge of guiding him to do good, by love of humanity, not evil, by love of funding and money at the cost of sacrificing troops lives. God desires mercy not sacrifice. Christians go after the 1 and leave the 99 behind. I should fear God should I sacrifice the weak, the sick, the elderly, the vulnerable, the misguided to the wolves to serve the pack. Troops are manipulated like the government's bitches, like dogs by praise and profit to be exploited like call girls for war money, not freedom. I must seek to protect them. You may see my words and deeds as an insult offense, but God teaches it is love to reign in folks from the slaughter. Love is not feeling good. It is actually feeling bad, having a conscience at harm to one's brother, our brother is all of humanity, to lose one to eternal sin, is to lose an irreplaceable treasure forever. Courts can guide the misled back to the narrow way and save souls, if I guide the misled courts to do so. The Supreme Court is hard headed and confused. I must seek to correct them. I am pretty sure my case will go to the Supreme Court eventually if not on this appeal, unless Biden surprises me by agreeing to a stipulation.

I asked the court to stand down its arms.

So, glad you spoke up since I already drafted something and held off on sending it since it was late. Please tell your arms to stand down and stop interfering to prevent escalation. Attached, please find a motion the COURT received where I respectfully requested your arms stop interfering in my case through threats or otherwise, especially Judge Clark. I was so disappointed in him.

Thank you. Have a good day.

With love and gratitude your kid is okay,

Meg

On Wednesday, May 26, 2021, 07:17:58 PM EDT, Mark Vavala <mvavala@dsba.org> wrote:

Hi Meg. No worries! My daughter moved to New York after working with ODC only for a short while. She wanted to live in Manhattan. My niece Kathy still works at ODC.

Thank you for your kind words. I really hope that you are well and aren't too stressed over all the things you wrote me about last time. I think the last President did some horrible things and I'm hopeful we all get a break from that behavior. It would be nice if everyone just treated each other with compassion and kindness. We never know what someone is going through.

Please take care of yourself. And stay safe.

Mark

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, May 26, 2021 11:54 AM
To: Mark Vavala <MVavala@dsba.org>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Your kid/meg worried

Hi Mark,

You were kind to me, and respected me as a human, even if you did not agree with me over all these years.

Others have not been so kind. Thank you.

I am concerned that your daughter may have lost her job at the ODC, because you were kind, and treated people like me fairly, without disparate treatment based on poverty, religion or political association.

I am sad I did not write anything to the court to address that.

I am sorry people get into trouble in this world for doing the right thing.

I hope your kid is working at another safe place.

Thank you for being a hero by your love for humanity, not sacrificing people for profit or praise. That makes you different.

Love,

Meg

SUPREME COURT OF DELAWARE

LISA A. DOLPH
Clerk

SUPREME COURT BUILDING
55 THE GREEN
DOVER DE 19901

DORIS J. ADKINS
Chief Deputy Clerk
DEBRA J. ZATLOKOVICZ
Senior Court Clerk
RENÉ A. WORRELL
Senior Court Clerk
BLIZABETH A. FELICIANO
Senior Court Clerk

(302) 739-4155
(302) 739-4156

February 2, 2021

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

Dear Ms. Kelly;

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 the assessment fee waived must file a formal request. The Court will take each request under consideration as received and act appropriately.

Very truly yours,

/s/ Lisa A. Dolph

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

February 5, 2021

Delaware Supreme Court
55 The Green
Dover, DE 19901

RE: Suspension of lawyer fees/Equal Protections concern/New Request 2022, flat fee for all licensure fees not based on years which is not rationally related to a legitimate purpose, instead arguably may be age discrimination to weed out older lawyers

Dear Honorable Supreme Court Chief Justice Collins J. Seitz, Jr.:

I hope you are healthy and well. Thank you for the February 2, 2021 letter in which the Court indicated it would consider requests for waivers of attorney fees on a case by case basis, by formal request.

My concern, is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the State's agencies, even the courts via the 14th Amendment, by 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 attorneys 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.

On an aside, the reason why I became a lawyer is my faith in Jesus Christ. Justice in the Courts is a command by God. See Amos 5:15. Jesus Christ taught that "justice, mercy, and faithfulness" are more important commands. Matthew 23:23.

Just like not all secular laws are afforded the same weight, but are superseded by greater laws for example federal laws preempt and supersede conflicting state laws, not all of God's laws are afforded the same weight but are superseded by the law of love. (See, John 19:11, Jesus told Pilate ...“ the one who handed me over to you has the greater sin.”); (See, 1 John 5:17, “All wrongdoing is sin, and there is sin that does not lead to death.”); (See, Luke 6:3-4 “Jesus replied, ‘Have you not read what David did when he and his companions were hungry? He entered the house of God, took the consecrated bread and gave it to his companions, and ate what is lawful only for the priests to eat.’” King David violated the Levitical laws to live for God. Yet, he was not guilty of wrong doing.); (See Hosea 6:6, Matthew 9:13, Matthew 12:7, Proverbs 21:3, Isaiah 1:11, God desires mercy not sacrifice.); (See, Isaiah 1:13-15 “Bring your worthless offerings no more; your incense is detestable to Me—your New Moons, Sabbaths, and convocations. I cannot endure iniquity in a solemn assembly. 14I hate your New Moons and your appointed feasts. They have become a burden to Me, I am weary of bearing them. When you spread out your hands in prayer, I will hide My eyes from you; even though you multiply your prayers, I will not listen. Your hands are covered with blood.”); (See, Matthew 12:1-8, Mark 2: 23:28, and Luke 6:1-5, Jesus picks grain on the Sabbath, allegedly violating

the law of the Sabbath, but not breaking the law.); (See, Matthew 12:9-14, Mark 3:1-6, and Luke 6:6-11, Jesus healed a man with a withered man on the Sabbath); (Luke 13:10-17, Jesus healed a woman with a hurt back on the Sabbath.); (Luke 14:1-6, Jesus healed a man with dropsy on the Sabbath); (John 5:1-9, John 7:21-24, Jesus healed a cripple man, who could not go into a pool of water without help.); (John 9:1-41, Jesus cures a blind man on the Sabbath.).

I believe the courts have the power to save lives and eternal lives. Our nation is in need of a hero. I know that the Courts have no power unless lawyers humble themselves and ask for their help. Now is a time I need my license to practice law the most.

I live in Sussex County where Bible boys gone wild teach anarchy, lawlessness, is freedom. Lawlessness is not freedom, but tyranny by those with money, power and connections without restraint, called laws to stop them from harming others to serve their own.

Some churches are misbehaving by inciting insurrection and disobedience to laws to attend services, which they call Sabbath, to serve their coffers.

Many preach breaking the Sabbath violates Jesus Christ's teachings. Jesus teaches us we break a greater law of love by not safeguarding the

health and valuing the dignity of lives of others, by failing to break the so-called Sabbath to preserve the health and lives of others. Id.

They preach for their own vanity, their own purpose, not to glorify God by his love and mercy. They are confused, and really do not know. They are tempted to break small laws meant for their benefit, to break greater laws by profiting off of the unholy cries for “Gods, guns and freedom.” My God is a God of life and love not death for dollars.

Our nation and the world is in trouble. I believe the Courts have the power to be our hero to save us, if we only have the courage to ask.

Things are not ok down here in Sussex. People see evil as good and good as evil.

The government through its agents misbehaves by citing the same passages in the Bible the KKK cites to serve their own gain under the guise of Godliness by violating Jesus’s teachings too.

Jesus says there is “no greater sacrifice than to lay down your life for one’s friend.” John 15:13 Jesus next says “You are my friend if you do what I command you.” John 15:14 Jesus commands us to love our enemies, not kill them. Matthew 5:38-48, Luke 6:27-36, Romans 12:14-21, Proverbs 25:21, Exodus 23:4-5. Yet, the military misleads our troops to harm enemies, under the guise of Godliness, but in truth to serve the vanity of

men. The troops are misled to potentially be damned to hell by serving reign by might not right, reign by violence and threat of death like barbarians instead of logic and reason in the courts. See, Hebrews 2:14, the devil has power over death. Jesus came to give life and eternal life. See, John 6:51.

With the acceptance of the cloak of government authority, government servants have fewer freedoms to share their belief and may not condemn nor support a religious belief under the inherent threat of persecution against people for believing differently than those with government authority.

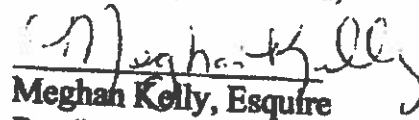
This Court does not have to believe as I do, to safeguard everyone's freedom to worship or not according to the dictates of their own conscience, without government sponsored persecution.

The Supreme Court misbehaves too. Please see the attached. I fear Justice Alito, Justice Kavanaugh and Justice Thomas are confused into believing in sacrificing human life to keep the so-called Sabbath and to serve business greed is keeping the law. They are wrong. They love money not humanity, and will sacrifice those the Constitution protects to serve the almighty dollar under the guise of an almighty God or good. See, Matthew 6:24. I think those justices will go to hell if they are not corrected by our courts or otherwise. Confusion kills. See 2 Corinthians 4:4.

This Court has the power to save lives and eternal lives, even the lives of US Supreme Court justices, via correction with mercy, to prevent condemnation by transforming wrong doers into right doers, by love for one another, not exploitation of one another to serve the love of money.

Thank you for your kind consideration.

Respectfully submitted,



Meghan Kelly, Esquire

Bar # 4968

34012 Shawnee Drive

Dagsboro, DE 19939

(Word Count 1431)

CC: LD, via Email

**Freedoms are not for sale
Business is not religion
Business Greed is not God**

The Supreme Court has before it a case to determine whether a government entity violates the free exercise of religion of a religious business organization by refusing to pay a Catholic agency to foster kids.

I argue it is not. I must confess, the Cake decision in *Masterpiece Cakeshop v. Colorado Civil Rights Commission*, where a similar issue arose, was as smooth as butter, so easy to swallow. But I realize now, the Honorable Supreme Court's decision is poison in that case too. It just took months to get through my hard head because I was so captivated by the brilliant, persuasive writing of the Supreme Court Justices.

Thank you for allowing me to share some hard to swallow words, that are nourishment to maintaining our freedom from government sponsored private oppression.

The distinguishing element in the Cake case and the one before the Honorable Supreme Court now is performing business by barter or exchange is not freedom, but costs a form of exchange. The critical element is looking at the permission to accept money in the form of business verses lawlessly turning people away, from serving a good or service based on personal religious beliefs or beliefs of conscience. The license to accept money verses the fundamental right to give money for a service or good without being turned away, based on religion, like race, or place of origin, is the critical.

Think of the horrors of our own history that we have overcome, the signs "No Catholics served here," "No Irish," or "No blacks."

Think of Delaware's ugly scar in *William Burton v Wilmington Parking Authority*, 365 U.S. 715 (1961), a government agency wrongfully permitted a business it leased a restaurant building to, to maintain a policy of saying no blacks served here. The Supreme Court kindly, like a loving parent, corrected our own misbehavior Delaware. It is wrong to tell people they may not be served here, even under the guise of God or good.

We have the freedom to worship or not according to the dictates of our own conscience, without government sponsored public or private persecution.

I thought hard about the 13th Amendment, involuntary servitude, and truth clunked in my hard head. Business is not a right. Freedoms are not for sale. Business is not a religion. Business greed is not God.

Businesses should not be in business if they get to turn away certain segments of society. If your religion requires discrimination in the business, you may choose a different business.

Freedom is not for sale. The government misbehaves by endorsing the premise those who do not conform to the beliefs of businessmen, women or entities may be turned away. Will business greed under the guise of Godliness become the religion of many more? Jesus Christ says, "You cannot serve both God and money." Citing, Matthew 6:24. I choose to guide folks to love one another, not exploit others to serve their own for their love and trust in money, as God.

Should the Supreme Court declare the mark of the beast, business greed is God, Congress through the interstate commerce clause has the power to balance, correct the Supreme Court's misbehavior, by passing laws to prevent businesses from turning people away based on religion, or other factors under the guise of religion, such as race, or place of origin.

Thank you for allowing me to share my concerns.

Appendix T

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

January 7, 2021

Delaware Supreme Court
55 The Green
Dover, DE 19901

**RE: Covid 19 order/Please suspend attorney fees for lawyers
unemployed due to the pandemic**

Dear Honorable Supreme Court Chief Justice Collins J. Seitz, Jr.:

Thank you for allowing lawyers to file pleadings with the court via email so we do not die of Covid 19.

I am writing to respectfully request this Honorable Court waive attorney registration fees for lawyers, out of work, due to the pandemic.

I worked in 2018, but in 2019-2020, I worked without pay, actually sacrificing from what I little I had by contacting federal law makers in an attempt to:

1. Prevent the elimination of social security and Medicare, replaced with Matthew 6 violations (forced volunteering or business, not for profit and charitable donations and fundraising which I believe violate Jesus's teachings leading to harm and hell by teaching giving to get is love, driving out God, love, from the hearts of men replaced with business greed,

which I believe is the mark of the damned should they not unhardened their hearts).

2. Prevent oil and gas drilling up and down our coast.

On an aside, I am disappointed in my relative by affinity, Mark Braden, Esq., former counsel to the Republican party in DC. His kid has a job related to off shore drilling. So did one of Mr. George Cole's kids. Mr. George Cole retired from office, as the longest serving local politician in one seat in Delaware's history. (Mike Castle does not count since he hopped seats.). It is wrong to compromise the environment and people's lives to serve your own family, especially by political people charged to serve the public.

3. Improve healthcare. Our healthcare is terrible because our laws and policies reward misbehavior and bad or different, not better care, at the expense of human life and health. Changing the laws would improve care. Throwing money at fundraisers and healthcare is incentive for more bad care, greed for more and more money.

Just decrees teach people to care about other people. Unjust decrees teach people to love money, rewarding misbehavior, encouraging folks to harm one another by ignorance or otherwise to serve money.

4. Prevent the kill old people laws suggested to save money.

People are priceless, not price tags. The elderly, ill and vulnerable are easily manipulated into believing hurting themselves helps others through the death with dignity acts.

There is too much temptation for people to encourage the elderly to harm themselves, die, and sadly I believe go to hell. Judas and Saul went to hell in the Bible for killing themselves.

Leaders misbehave when they draft laws and policies which encourage those they serve to die and potentially go to hell. I want people to live and have eternal life. Per the bible, just decrees and justice in the courts has the power to save lives and eternal lives.

You really have the power to be life savers and eternal life savers as judges, via correction to prevent condemnation in hell for the love of money driving out love for humanity.

5. I proposed 5 articles of impeachment and contacted all 541 federal law makers.

Since, I did not work during 2019-2020, I am not eligible for the \$600 bail out, and will not likely be eligible for future bail outs.

My old law firm was interested in me in 2020. I was negotiating for a position, per the attached emails. I stopped the negotiations to sue the

Democrats because seeking to do the right thing is more important than money. Then, the pandemic hit. I withdrew my law suit since I did not want people to die, and reached out to my law firm. Negotiations are on a stand still. Covid19 hampered prospects.


I am concerned about dying for dollars, during this pandemic. I actually was born with breathing problems, and have severe allergies that make my throat close up. So, catching covid19 would likely be a death sentence for me.

Thank you for considering my life potentially more valuable than a few hundred dollars.

The Supreme Court could possibly include a suspension of lawyer fees, solely for the unemployed, in their covid19 measures. I tried to contact the Governor too. The Governor could also include a suspension for licensure fees for those unemployed, limited to those not using their license during the pandemic, too.

Thank you for your kind consideration.

Respectfully submitted,



Meghan Kelly, Esquire

Pro Se, Bar # 4968

34012 Shawnee Drive

Dagsboro, DE 19939

(Word Count 76P6)

Re: McDonnell/Meg Kelly/ void November 19 Contract

From: Christie McDonnell (christie.mcdonnell@mcdonnelllawfirm.com)
To: meghankellyesq@yahoo.com
Cc: Virginia.Gaitens@McDonnellLawFirm.com
Date: Friday, November 22, 2019, 08:38 AM EST

I tried to negotiate for more money

Good morning, Meg,

Per your request we will tear up the offer you signed thus making it null and void. We do not accept your counteroffer.

We wish you the very best.

****All Funds greater than \$5,000 must be WIRED to our trust account. Please CALL your Closer if you need our wiring instructions. Due to the rise in wire fraud, our wiring instructions will not be resent via email. Please note that McDonnell and Associates does not change our wiring instructions. Please call your closer immediately if you receive revised wiring instructions.****

Regards,

Christie McDonnell
Chief Strategy Officer
(843) 375-8930 (office)
Christie.McDonnell@McDonnellLawFirm.com | McDonnellLawFirm.com

This message and any attachments are solely for the intended recipient and may contain confidential or privileged information. If you are not the intended recipient, any disclosure, copying, use, or distribution of the information included in this message and any attachments is prohibited. If you have received this communication in error, please notify us by reply e-mail and immediately and permanently delete this message and any attachments. Thank you.

On Nov 22, 2019, at 7:28 AM, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good morning,

Please tear up the contract for \$55,000.

Attached, please find my first salary as a licensed attorney, \$135,000.00.

With this additional potential liability and responsibility should anyone mess up on IOLTA accounts, state and federal taxes, or attorney work product, I require a higher salary.

I do not need this job, but you need a managing attorney in Delaware, in addition to an office to perform any business in this state period.

You can always open additional offices to house employees, but few attorneys would manage because of the great risk.

I require a firm credit card for business expenses, and a detailed explanation on how taxes will be handled in Delaware.

I assume McDonnell's South Carolina head quarters would handle payroll and adhere to Delaware's local, state and federal income taxes. If this is not the case, I am not interested.

I must be able to oversee others through trustworthy team members or by other means.

I require details concerning the professional liability insurance that will cover me and any potential employees.

Down the line, I require anti-discrimination training based on gender, race, religion or place of origin to be signed by all employees.

Delaware is number 2 in foreclosures in the entire country. Your firm is merely opening up. I know this small start is going to grow dramatically into a large beast sooner than you realize. I need to tame this beast now. So I keep it under control and in adherence to Delaware law. So it does not transform into a monster.

I was disappointed to see Jennifer Cooper, Esq. is an attorney too, not an accountant.

I need to be able to have access to each and every item I must review on IOLTA accounts. I must be comfortable and may need a few days to practice in house in South Carolina. Please help me on this. This is mandatory. I must be comfortable adhering to the IOLTA. I must know how to adhere to them before I leave South Carolina.

Would you consider \$135,000, my first year's salary as an attorney?

I am not going to be exploited, nor will I exploit others. I gave my life to God, not to man's greedy, self serving desires. I desire to serve, to teach respect for the dignity of every person in my life, regardless of race, religion or place of origin, not respect for the mere bottom line.

The purpose of my life is bigger than bucks. So is yours. Your life is worth more than money and can not be bought or enslaved by mere peanuts. I will not be exploited and enslaved for mere peanuts.

Thank you for your time. I am copying my most trusted friend.

Think about it.

Have a good weekend.

Best regards,
Meg Kelly, Esq.

Would you consider

Sent from my iPhone

Begin forwarded message:

From: matthewkosiorek@comcast.net
Date: May 18, 2013 at 9:16:00 AM EDT
To: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Richards

**CONFIDENTIAL
MEMORANDUM**

TO: Meghan Kelly

FROM: Gregory P. Williams

RE: **Employment Arrangement**

DATE: November 20, 2006

This memorandum outlines the arrangement, which was made concerning your employment with Richards, Layton & Finger, P.A.

The following arrangements have been established for your employment commencing November 20, 2006:

1. You will be subject to the same terms and conditions of employment as all other associates (including quality of work, oversight and annual review), except as set forth below. The Firm's expectation is that you will continue to work billable hours comparable to those worked by other full-time associates in the Business Department. All non-billable work hours should be approved by your assigning director.
2. You will be paid an annual base salary of \$135,000. In the future, any adjustments will be made by the Ad Hoc Associate Salary and Bonus Committee.
3. You will not be entitled to bonuses. You may be eligible for bonuses in an amount which will be determined by the Firm.
4. You are not on track for admission to the Firm as a director and you will not be considered for election to the board of directors of the Firm.

-1-

RLFADMIN-3061182-1

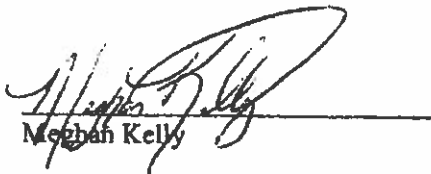
5. You will have an assigning director and will generally, other than what is set forth in this memorandum, receive the same benefits as and otherwise be treated in a similar manner as any other associate.
6. These employment arrangements will be reviewed by the Firm on or before June 30 of each year commencing with June 30, 2007, unless such arrangements have been terminated.

7. As with all employees of the Firm, your employment is at-will.



Gregory P. Williams
President
Richards, Layton & Finger, P.A.

11/20/06
Date



Meghan Kelly

11/30/06
Date

7/2021

RE: part 1 Happy Labor Day weekend/ Meg Kelly/old complaint against the democrats

From: Christie McDonnell (christie.mcdonnell@mcdonnelllawfirm.com)
To: meg.hankellyesq@yahoo.com
Date: Wednesday, September 9, 2020, 01:02 PM EDT

Hey Meg,
I hope you are doing well and staying safe! Are you looking to do contract closings? You may remember we do closings at borrowers homes/offices etc. I thought that was something you were not fond of doing.

-----Original Message-----

From: Meg Kelly <meg.hankellyesq@yahoo.com>
Sent: Sunday, September 6, 2020 8:58 AM
To: Christie McDonnell <Christie.McDonnell@mcdonnelllawfirm.com>; Christie McDonnell <Christie.McDonnell@mcdonnelllawfirm.com>
Cc: Meg Kelly <meg.hankellyesq@yahoo.com>
Subject: part 1 Happy Labor Day weekend/ Meg Kelly/old complaint against the democrats

Hi Christie,

I hope you are doing well, and staying safe.

I am working on a complaint for immediate equitable relief against President Trump that will likely go to the US Supreme Court.

I do not have to pay court costs if I make below poverty pay for state or federal courts, or even the Supreme Court. I do not know if costs must be paid should I retain an attorney down the line. I will ask the court.

In the meantime, I am willing to work as an independent contractor for very low pay, not gaining personal income for what I bring in as I work on my personal task to save the country, or in the alternative I may be able to find an attorney who will not require I pay court costs.

I will send you a draft complaint. It is important that you insulate the firm from my personal venture, in case you are interested in me.

In the meantime, I am showing you what I filed against the Democrats and withdrew.

It is like the wild, wild West in Delaware. Biden will not be our hero. We have to choose to be the heroes for one another by our love for others.

I apologize, my new phone is not working, but I thank you for your time and consideration. I am willing to risk my life for God, not money, and I would work to safeguard the firm and the client's health, even if I look like a dork in protective gear.

Thank you for your kind consideration. Side note, I have a little bit of the inside scoop since I worked in the largest corporate law firm in DE, the corporate center of the globe. I seek to prevent the man made, unnatural economic crash too.

Stay safe.

Love,
Meg

Appendix U

MEGHAN KELLY, ESQ.

34012 Shawnee Drive
Dagsboro, DE 19939

Third Circuit Court of Appeals
James A. Byrne United States Courthouse
601 Market Street
Philadelphia, PA 19106

RE: /Kelly v Swartz, et al. No. 22-3198 and 22-8037 Meg filed a Second Motion for a Stay and a Rule 60 Motion with the DE District Court requiring a stay in the Third Circuit/Procedural issue

October 14, 2022

Dear Honorable Court:

On October 7, 2022, I mailed out *Plaintiff Meghan Kelly's Motion pursuant to FRCP R. 60(b)(1)(2)(3)(4)(6) to alter and amend the orders, dated November 2, 2022, December 22, 2021, and April 26, 2022, and Motion to Stay the Proceeding until the State Proceeding is concluded, including appeals to the US Supreme Court or the time for appeal has concluded and Plaintiff Meghan M Kelly's Second Motion to stay the Proceeding until the conclusion of Respondent's originating disciplinary proceeding until a final non-appealable determination is made or the time of appeal has lapsed. Plaintiff further moves the Court, for good cause for permission to file an Amended complaint 30 days after the stay is lifted* I filed a Motion to amend the Order under Federal Rules of Civil Procedure Rule 60, incorporated herein by reference with the Delaware District Court.

The Court received the filings on October 11, 2022, but required additional time to file them. I see a filing error. Docket Item 95-4, Page 2-8 Page ID 12619 through Page ID 12625 should be removed from Docket Item 95, and placed **after** entry Docket Item 96 Page 12 Page ID 12640, and before Docket entry Docket Item 96-1, Page 1-12 12641.

The Court required extra time to look through the material accurately per my phone calls. The misfiling of the Second Motion for a Stay hopefully was not done intentionally, especially in light of the extra two or three days the staff took to allegedly carefully review the documents.

Nevertheless, I am concerned about the oversight, especially since parts of the Motion were split between two docket item numbers. It would alleviate a burden off the backs of the staff and place the responsibility upon me to accurately file should permission to e-file be restated in the Delaware District Court.

There are new and additional facts opposing counsel is aware of I could not discover without reasonable diligence. I actually am waiting to learn of more material facts, per the attached email for a complete more accurate understanding.

I pray the Delaware District Court grants a stay in order that I may file all the new facts as they arise at once at the conclusion of the Delaware Disciplinary appeal to the US Supreme Court instead of constantly potentially ping ponging between courts.

Otherwise, I will be required to file yet another motion to amend the facts and findings relating to newly discovered information I have not received as even today.

Regardless, the Third Circuit Court should be stayed upon my filing a timely appeal within 30 days of the determination of the Delaware District Court's motion, not prior to the filing of my appeal notice.

I will appeal an Amended Appeal per your procedural non legal instructions.

Thank you for your time and consideration.

Respectfully Submitted,

October 14, 2022

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
302-493-6693
Bar No 4968 DEACTIVE

Appendix V

SUPREME COURT OF PENNSYLVANIA

IN THE MATTER OF A MEMBER	§	No. 2913 DD3
OF THE BAR	§	No. 118 DB 2022
	§	(Supreme Court of Delaware, No. 58,
	§	2022)
MEGHAN M. KELLY,	§	Attorney Registration No. 202268
Respondent.	§	(out of state)

Respondent Meghan M. Kelly’s Motion pursuant to Pa. R.A.P. 105 for permission to file unconfirming documents and to compel the acceptance of rejected documents upon the date of their submission, with allowance for opposing counsel to respond

I, Meghan M. Kelly, pro se non-attorney, retired, respondent, pursuant to Pa. R.A.P. 105 move this honorable Court for permission to file unconfirming documents and to compel the Court to accept and docket rejected documents upon the date of their submission, with allowance for opposing counsel to respond, as if the date was tolled on the date of their docketing, the later date. I aver as follows:

Background

1. This disciplinary case arises because the State of Delaware does not want to be inconvenienced by upholding my Constitutional religious beliefs that do not conform to their desires. I am a Christian. I believe people sin and serve lawlessness by focus on productivity, money, convenience, costs and profit. It creates injustice and bias towards the Courts by teaching judges to have an evil unjust eye to look at people as products to exploit for material gain, instead of

people to respect, even if their religious beliefs do not conform to the belief of the majority, that money and material gain is goal.

2. Jesus teaches most people choose the way to hell. God teaches ignorance, not knowing, misunderstanding, confusion between lusts and love, if left in the dark leads to people's destruction in hell, should they not be saved by truth. Hosea 4:6. I believe that courts may save not only lives, but eternal lives too by those misguided by lawless lusts, business greed, at the exchange of harming, oppressing and destroying, essentially selling the souls of other people to repent, to turn away from such evil praised as good.

3. Jesus teaches you cannot serve God and money. Jesus teaches what profits a man to gain the world only to lose his eternal soul in hell.

4. I believe every judge and person who focuses on the government service of the judiciary in terms of costs, productivity and mere business corrupt the courts guaranteeing injustice by teaching judges to value moth and rust money and material gain at the cost of sacrificing individuals and individual liberty, making the people not free, but for sale products in contravention to the 13th Amendment. I believe the focus on convenience, costs and productivity at the cost of exchanging the souls, the life and liberty of people as if they are expendable products is lawlessness spoken of in the Bible misleading people to lose eternal life

in hell for just doing their job, doing what the rules require, what they are told to do. US Amend XIII.

5. Government is not a business, and the people are free, not for sale products to serve individuals within the state or the government backed private or foreign partners. The government has it backwards the people should not serve their country to be sacrificed, the country should serve and care for its people.

6. For years I have sent petitions to the Delaware Courts asserting my right to exercise religious beliefs, and from being compelled to violate my religious beliefs for the mere convenience of the state or government backed private and foreign partners. From my inception into the Bar in DE, the Clerk of Court compelled me to violate my religious belief by swearing in the Bar, when I specifically made a religious objection to swearing in.

7. The Exhibits to the petitions are voluminous but necessary to my defense. I also assert additional testimony and evidence is necessary to my defense. I discovered to my horror, additional Delaware Supreme Court collusion in misconduct in inciting the disciplinary case, which is necessary to my defense of reciprocal discipline by the PA Supreme Court.

8. I have also experienced hardship, in terms of a computer broke, internet issues, and a printer that required repair. I filed a letter this court refused to docket, I attach hererto and request it be docketed as not to deny me an

opportunity to be heard in violation of the 1st and 14th Amendment upon the date of its submission, I think December 13, 2022. I attach it hereto and incorporate it herein.

9. Josh, the Case manager recommended I submit an amended motion for a reconsideration this Court refused to docket. I request that be docketed on the record for the Court to accept or reject.

10. That item was not docketed. I filed it on December 13, 2022. It was rejected with delay prejudicing me on December 15, 2022.

11. Under emergency circumstances, on December 19, 2022 I submitted a Second Motion for a Stay and in the alternative a continuation the Court refused to docket. I request this be docketed. I attach that motion hereto and incorporate it herein.

12. The Court indicated it asserts its right not to receive unconfirming documents on a comments section, despite this court's prior grant of receipt of my unconfirming pro se filings in accordance to my prior motions under Pa. R.A.P. 105.

13. I believe this Court previously was amicable to my prior motion to file unconfirming documents under Pa. R.A.P. 105.

14. I request the Clerk be instructed to file such documents, especially since a stay is still required, and testimony and evidence is better gathered in the open Delaware District Court Forum.

15. I am prejudiced by the denial of an opportunity to be heard and by the denial of motions by this Court indirectly by this Court's failure to submit them for review.

16. I have submitted two motions on December 22, 2022 that were not accepted yet, that I request this Court compel the Clerk to accept. I request this Court order their submission. That way a judgment is not rendered in bad faith, indirectly, by refusing me an opportunity to be heard on the motions.

17. On December 22, 2022, I submitted 1. *Petitioner Meghan Kelly's Motion to exempt costs or expenses to Pennsylvania Disciplinary Counsel and/or to the Board if applicable due to utter poverty, and due to foreseeable costs creating a substantial burden upon Petitioner's access to the courts and forced violation of her religious beliefs by threat of indebtedness and additional relief and* 2. *Respondent Meghan Kelly's motion to separately file exhibits or additional exhibits and incorporate them herein in their entirety by reference in her motion contesting reciprocal discipline.*

18. I am prejudiced by the failure of the Court to submit these documents. I am having a hard time uploading the exhibits necessary to defend my license, and the apparent due date is today.

19. I am prejudiced by the denial of time I require and am compelled to throw together something that is not up to my personal standards due to inability to work on it. This Court did not know I was without access to my computer or tools since the Clerk refused to file documents where I apprise this Court of new hardships. This Court is without important knowledge that my health has suffered due to lack of time required to care for myself in light of limitations I previously apprised this Court of relating to a surgery that are a matter of life and death.

Albeit, I told the case manager Josh on the phone that my health was suffering and the Court has notice on the record that I risk death should this Court refuse me an opportunity to have time to drink gallons of water and rest an ordinary person without a limitation does not require to sustain my health and life. Please see the attachments to my First Motion for a stay and turn towards the table of contents and pull the health document and letter from the Eastern District Court. My life should not be sacrificed and my health should not be lost for the convenience and profit of this Court because it does not want to safeguard my Constitutional First amendment rights and opportunity to be heard since the material is voluminous,

showing years of disparate treatment by DE against me with religious-political-poverty animus and indifference towards the rule of law, the Constitution.

20. I have religious objections to healthcare and mental health care. I believe people go to hell for even thinking they help people pay referring them to pay to eliminate problems. I believe people go to hell for teaching people to trust experts, making the experts God and guide and above Court correction if their professional standards are the standard the courts deer to. This allows bad businesses to be above the law, serving what I believe is the mark of the beast, damning the majority to lose eternal life on the last day. I desire judges to be the judge not businesses through paid professional experts. Business is not the law. Money is not the aim. Protecting individual and free will from forced oppression by private and public entities is. We learn from one another by diverse debate instead of dumbed down standardization which is made to serve lawless lusts convenience, expediency not justice, not fairness, not equality in terms of equal protections under the law where I protect your freedom to disagree with me and believe differently.

21. On an aside, I am not acting as an attorney. To my knowledge, I have never practiced in PA, and have been retired since 2018. I do not have access to a lot of resources attorneys actively practice do, as a pro se, non-attorney party. I admit, I thought I had to file a document within 30 days, which was rightly

rejected. I desperately sought to file a Motion for reargument on rejection of the first motion of a stay. I did not know that was not permitted and did not have access to the rules.

22. Nevertheless, the Motion to amend the motion for reargument and the Second Motion for a Stay where I asserted an ADA claim to protect my life, not only my liberty was not docketed. DE claims my religious beliefs are evidence of a “mental disability,” yet I have a physical limitation. This Court has notice of it on the record.

23. I was denied an opportunity to be heard in violation of the 1st and 14th Amendment on my Second Motion for a stay or in the alternative a continuation. Nevertheless, this Court may correct its error by submitting the documents, because a stay is required, and new evidence is best gathered in other forums in order not to prejudice me further by denying me First Amendment rights of life and liberty, due process and other foreseeable harm.

24. Attached, please also find part of my initial motion for a stay, I incorporate herein by reference and incorporate the entire motion, despite attaching part.

25. I sought to prevent the waste of resources requiring the pleading of voluminous documents to conserve resources at the inception, when this case may be stayed and resources conserved. This Court erred in denying my stay.

26. Pursuant to Pa. R.A.P. 105

(a) *Liberal construction and modification of rules.*—These rules shall be liberally construed to secure the just, speedy, and inexpensive determination of every matter to which they are applicable. In the interest of expediting decision, or for other good cause shown, an appellate court may, except as otherwise provided in paragraph (b) of this rule, disregard the requirements or provisions of any of these rules in a particular case on application of a party or on its own motion and may order proceedings in accordance with its direction.

(b) *Enlargement of time.*—An appellate court for good cause shown may upon application enlarge the time prescribed by these rules or by its order for doing any act, or may permit an act to be done after the expiration of such time, but the court may not enlarge the time for filing a notice of appeal, a petition for allowance of appeal, a petition for permission to appeal, a petition for review, or a petition for specialized review.”

27. I am prejudiced by throwing together something without adequate time while the government compels me to harm my health when my teeth and body is suffering now due to severe dehydration that may become deadly if not addressed. I am compelled to file something subpar to take time necessary to lay down with a gallons of water because of this Court’s denial of an opportunity to be heard on safeguarding not only my liberty, license, eternal life but my life too.

28. What is quite prejudicial in the failure to submit the motions I filed yesterday is I must file something today. I had trouble figuring out how to upload exhibits, given the record before the DE Board is voluminous, and I believe included a video exhibits. I have not had the opportunity or ability to look into this given my computer broke and time constraints.

29. I need to preserve my life. One of the motions relates to exhibits. I attempted to upload exhibits separately, and may place my pleading on the bottom. I do not want to confuse the Court or create additional work. I thought it would be easier to file exhibits separately so the court may not confuse exhibits for new pleadings. The motion is still necessary and should be filed on the record to show my attempt. Yet, I will probably file a response to the order, which prejudices me because I am denied meaningful opportunity to defend my license, under these exigent circumstances, without ability to revise, research and shorten my draft.

30. The response will be at the bottom, should I file it with the voluminous exhibits I took great time to upload late into the night.

Wherefore, I, Meghan M. Kelly, Plaintiff, Plaintiff respectfully assert this Court must grant this motion.

Dated December 23, 2022 Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
(2863 Words) Retired No 202268

26. Pursuant to Pa. R.A.P. 105

(a) *Liberal construction and modification of rules.*—These rules shall be liberally construed to secure the just, speedy, and inexpensive determination of every matter to which they are applicable. In the interest of expediting decision, or for other good cause shown, an appellate court may, except as otherwise provided in paragraph (b) of this rule, disregard the requirements or provisions of any of these rules in a particular case on application of a party or on its own motion and may order proceedings in accordance with its direction.

(b) *Enlargement of time.*—An appellate court for good cause shown may upon application enlarge the time prescribed by these rules or by its order for doing any act, or may permit an act to be done after the expiration of such time, but the court may not enlarge the time for filing a notice of appeal, a petition for allowance of appeal, a petition for permission to appeal, a petition for review, or a petition for specialized review.”

27. I am prejudiced by throwing together something without adequate time while the government compels me to harm my health when my teeth and body is suffering now due to severe dehydration that may become deadly if not

29. I need to preserve my life. One of the motions relates to exhibits. I attempted to upload exhibits separately, and may place my pleading on the bottom. I do not want to confuse the Court or create additional work. I thought it would be easier to file exhibits separately so the court may not confuse exhibits for new pleadings. The motion is still necessary and should be filed on the record to show my attempt. Yet, I will probably file a response to the order, which prejudices me because I am denied meaningful opportunity to defend my license, under these exigent circumstances, without ability to revise, research and shorten my draft.

30. The response will be at the bottom, should I file it with the voluminous exhibits I took great time to upload late into the night.

Wherefore, I, Meghan M. Kelly, Plaintiff, Plaintiff respectfully assert this Court must grant this motion.

Dated December 23, 2022 Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
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(302) 493-6693
(2863 Words) Retired No 202268

Appendix W

SUPREME COURT OF PENNSYLVANIA

IN THE MATTER OF A MEMBER § No. 2913 DD3
OF THE BAR § No. 118 DB 2022
§ (Supreme Court of Delaware, No. 58,
§ 2022)
MEGHAN M. KELLY, § Attorney Registration No. 202268
Respondent. § (out of state)

Respondent Meghan M Kelly’s **Second Motion for a stay** due to circumstances increasing prejudice and harm, new facts arising necessary to my defense of reciprocal order, and additional questions that require answers in order to defend myself in response to the reciprocal order **in the alternative a continuance of 6 months**

I, Respondent Meghan M. Kelly, move this Court to stay this proceeding, until conclusion of both Respondent’s originating disciplinary proceeding as well as the civil rights proceeding Kelly v Swartz, et al. Case Number 21-1490, until final non-appealable determinations are made or the time of appeal has lapsed. Respondent further moves the Court, for good cause, for permission to file the “for cause” motion 30 days after the stay is lifted, and in the alternative a continuance of 6 months I aver.

1. On November 8, 2022 this Honorable Court ordered:

“AND NOW, this 8th day of November, 2022, the Application to Waive Costs is dismissed as moot. The Motion to File Unconforming Pleadings is granted. See Pa.R.A.P. 124(b). The Motion to Stay the Proceeding is denied. Respondent is afforded an additional 30 days from the date of this Order to inform this Court of any grounds against the imposition of the identical or comparable discipline in this Commonwealth.” (Hereinafter “Reciprocal-Order” or “Order”)

2. New and additional facts necessary to my defense of reciprocal-order was recently discovered.

3. Additional questions I require answers necessary to my defense must be ascertained in order that I may defend my retired license, and related interests.

4. This Court must afford me procedural due process to prevent additional retaliation based on the Delaware Supreme Court, Court agents and the Delaware Office of disciplinary counsel's selective application of discipline against me in retaliation for the exercise of my First Amendment right to religious belief, First Amendment right to exercise religious belief, First Amendment right of association, First Amendment right of speech, 14th Amendment right to access to the courts, with religious-political-poverty animus which is a violation of the Equal Protections Clause. US Amend I, XIV.

5. The Delaware disciplinary proceeding violates my First Amendment right to the free exercise of religion, belief, speech, association and petition, by indicating my religious beliefs contained in my religious restoration act petitions are evidence of a mental disability. (Petition at 7, August 23, 2021 letter Exhibits 1 and 2). The Delaware Supreme Court impermissibly conditioned my license to practice law on the surrender of my protected exercise of Constitutional rights.

6. States may not inactivate my duly earned license to practice law nor can they deny me my retired Pennsylvania license to practice law as a consequence of exercising my freedom of religion, speech, association, the right to petition, equal protection and other federally protected rights which supersede, preempt and limit the state's power. The state may not condition the exercise of a Constitutional liberty, upon the loss of a state earned and my entitled benefit in my Delaware active license to practice law or retired Pennsylvania license to practice law.¹

¹ U.S. Const. art. VI., § 2; *See, Minn. Ass'n, Health Care v. Minn. Dept.*, P.W, 742 F.2d 442, 446 (8th Cir. 1984); "To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." 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); *See, Jones v. Board of Education*, 397 U.S. 31, 34 (1970); "The

7. I must be afforded an opportunity to overturn the Delaware order on appeal and in the civil rights case bin order to conserve resources and to prevent this court from creating an obstacle so great as to deny me access to the courts, even its own court.

8. Conditioning the loss of my property interest in my active or retired license to practice law on my decision to exercise of Constitutionally protected conduct to petition to safeguard my private-religious-exercise of beliefs, private religious-beliefs, private religious-political-affiliation, and private religious-political-professional association is unconscionable. The precedent set by the Delaware Supreme Court will chill other people from exercising their right to access the courts to address grievances they believe to have been committed against them by the government, which essentially making government above the law, should it not be overturned.²

9. I must be afforded an opportunity to gather accurate information for my defense to show that the disciplinary proceeding in Delaware **was not fair, but fixed** with members of

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, 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.”); See, *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970), (“Neither the state in general ... is free to prohibit any kind of expression because it does not like what is being said.”)

² See, *Barry v. Barchi*, 443 U.S. 55, 65 n.11 (1979); “State law has engendered a clear expectation of continued enjoyment of a license absent proof of culpable conduct by the [me. I, have] asserted a legitimate ‘claim of entitlement’” *Citing, Perry v. Sindermann*, 408 U.S. 593, 601 (1972); see *Board of Regents v. Roth*, 408 U.S. 564 (1972); *Bell v. Burson*, 402 U.S. 535, 539 (1971); *Goldberg v. Kelly*, 397 U.S. 254 (1970).”

the Delaware Supreme Court exhibiting bias and collusion. I recently discovered the DE Supreme Court covered up my pleadings regarding due process violations in *Kelly v Trump* to prevent the US Supreme Court's review, a mistrial and to actively participate in prejudicing the case against me in the Delaware on or about December 1, 2022. It appears a member of the Court accessed the docket the date of the preliminary hearing, as opposed to merely sealing it on that date. The members of the Delaware Supreme Court appeared to cover up evidence material to my defense which was not accessible on the record in the Delaware preliminary hearing or the Delaware Board proceeding.

10. I must be afforded an opportunity to show I was denied basic procedural due process rights at the Delaware proceeding in contravention of the 1st and 14th Amendment protections that others similarly situated are afforded.³ On or about December 1, 2022, I discovered the Delaware Supreme Court sealed documents in *Kelly v Trump*

11. Due process requirement of fair trials before impartial tribunals extends to administrative tribunals as well as courts.⁴

³ *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005) (The Third Circuit held, "A judgment may also be void if a court "acted in a manner inconsistent with due process of law."); (See, *May v. Anderson*, 345 U.S. 528, 537(1953) "It is void ... if it denies due process of law."); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments " are void for lack of due process of law, or should be set aside for error.").

⁴ US Const. Amend I, V. (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) ("Petitioner is entitled to a neutral and detached judge in the first instance."); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) ("excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error."Opinion testimony by a judge creates the appearance eof partiality on behalf of a litigant, is greatly prejudicial to the adverse party..."); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989); *Montgomery Tp. v.*

12. Pursuant to Pa.R.D.E., Rule 216 (c) provides:

“(c) Upon the expiration of 30 days from service of the notice issued pursuant to the provisions of subdivision (a) of this rule, the Supreme Court may impose the identical or comparable discipline or transfer to disability inactive status unless Disciplinary Counsel or the respondent-attorney demonstrates, or the Court finds that upon the face of the record upon which the discipline is predicated it clearly appears:

(1) that the procedure was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process;

(2) there was such an infirmity of proof establishing the misconduct as to give rise to the clear conviction that the Court could not consistently with its duty accept as final the conclusion on that subject; or

(3) that the imposition of the same or comparable discipline would result in grave injustice, or be offensive to the public policy of this Commonwealth.” PA ST DISC Rule 216

13. The new facts and questions relate to all three of these defenses this Court requires I respond to by December 23, 2022.

14. I also require a stay as other new facts have arisen increasing the harm towards me in terms of exacerbating a substantial burden due to costs of time and resources as to deny me access to the courts, compelled religious violations against indebtedness, risk of loss of life and health, should a stay or a continuance be denied.

Com., Bureau of Social Sec. for Public Employees, 449 A.2d 841, 68 Pa.Cmwth. 525, 1982; *Bruteyn v. State Dental Council and Examining Bd.*, 380 A.2d 497, 32 Pa.Cmwth. 541, 1977; *Begis v. Industrial Bd. of Dept. of Labor and Industry*, 308 A.2d 643, 9 Pa.Cmwth. 558, 1973; *Straw v. Com. Human Relations Commission*, 308 A.2d 619, 10 Pa.Cmwth. 99, 1973; *First Nat. Bank of Pike County v. Department of Banking*, 300 A.2d 823, 7 Pa.Cmwth. 603, 1973; *Gaudenzia, Inc. v. Zoning Bd. of Adjustment of City of Philadelphia*, 287 A.2d 698, 4 Pa.Cmwth. 355, 1972; *W. J. Dillner Transp. Co. v. Pennsylvania Public Utility Commission*, 107 A.2d 159, 175 Pa.Super. 580, 1954, appeal dismissed 75 S.Ct. 580, 349 U.S. 903, 99 L.Ed. 1240; See, *Peters v. Kiff*, 407 U.S. 493, 502 (1972), *Overruled in Gregg v. Georgia*, 428 U.S. 153, 169 (1976), on other grounds.

15. Without delay, I attempted to file a series of motions requiring a stay or more time which were rejected by this Court. This Court took additional time before apprising me of rejections which caused additional prejudice to my defense.

16. I contacted the Court concerning the delay given the dire irreparable injury I face. The Court delayed further in making determinations.

17. The Clerk Nicole Traini (hereinafter "Clerk") appeared to argue on behalf of PA-ODC by making meritless arguments regarding resignation, representation of counsel, and other discussions which showed bias in favor of PA-ODC.

18. Early on the Clerk seemed to trivialize the placement of my retired license on inactive disabled as not having influence in DE or beyond.

19. My ability to seek to regain employment in my former firm would be eliminated by PA's placement of my license on inactive disabled. In addition, it would be additional government persecution against me based on my exercise of Constitutional rights. The states do not have a license to violate federal and constitutional law under the shield of governing businesses, including the practice of law. This essentially requires licensed attorneys or those who retired their licenses to exchange their First Amendment liberties and other Constitutional protections in order to be afforded the opportunity to buy and sell as a lawyer.

20. I by no means desired to waste the courts time by filing motions this court would reject. Our case manager recommended I file an amended motion for a reargument for a motion for a stay. I thought the Motion to amend my motion for reargument filed on December 13, 2022 would be accepted. This Court denied me an opportunity to be heard on this motion in violation of the 1st and 14th Amendment by failing to submit it. (Exhibit 3)

21. This Court also violated my right to be heard in defense of my Constitutional liberty, property interests, life and eternal life when it refused to docket the attached letter, I incorporate herein by reference in its entirety. (Exhibit 4) The letter outlines my circumstances. The rejection of the letter prevents me from an opportunity to plead my circumstances before the Court unless this Court accepts this pleading. US Amend. I, XIV.

22. New circumstances arose exacerbating irreparable injury to me in terms of creating obstacles so great as to deny me access to the courts to defend my liberty, exercise of Constitutional rights, my life and interests related to licenses. My computer broke. My internet has been experiencing problems, my printer needed repairs, and my health is suffering.

23. My poverty and costs associated with 5 reciprocal law suits against me and one civil rights case have also increased. Each court has unique legal issues to address with unique rules. I require time to draft documents to plead my defense so I am not denied meaningful participation in this court proceeding, and other court proceedings.

24. I intended to include motion to exempt costs by the state through opposing counsel. Costs and fees, including fees relating to the transmittal of the record violate my religious belief against debt, servitude to Satan in violation of the 13th Amendment and damnation in hell by making money my guide, as opposed to God. It is my religious belief Jesus teaches you cannot serve money and God. *Matthew* 6:24. Jesus also teaches the fact people were too concerned with earning money to pay bills and care for their own to care to love God and others is guilt. *Matthew* 13. Jesus teaches putting family first is guilt leading to hell. *Matthew* 10:34-39

25. I asked opposing counsel his stance on additional motions. The government through its arms should not compel me to violate my religious beliefs against debt in order to exercise my right to be heard, or cause me to forgo my 1st and 14th Amendment rights. I should be afforded time to draft necessary motions.

26. I am threatened with harm to health and even possible death due to severe dehydration should this court not accommodate me by granting me time I require to sustain my life and health in addition to defending my liberties before the Courts. I have religious objections to healthcare and mental healthcare.

27. I believe people sin when they thoughtlessly refer people to doctors, mental health specialists or professionals to pay to fix their problems misleading others to exploitation to serve greed. Many professionals are rendered above the law. Their standards are the letter of the law Courts wrongly adhere to in determining whether workers performed the requisite duty of care. This creates poor products, bad services and evil businesses that are left uncorrected when they harm people for profit.

28. I believe that courts can save lives and eternal lives by correcting people paid to perform business who ignorantly or indifferently kill, steals, oppresses or destroys human life and health for the bottom line. *Matthew 23:23, Amos 5:15.*

29. I have strong religious objections to healthcare and mental healthcare. I believe people sin by blindly doing what they are trained to do, told to do, paid to do without choosing to see clearly to care about the potential harm they cause towards those they profess to serve. I believe people sin for teaching others to trust professionals in place of God. I believe business

greed, conditionally caring is the mark of lawless lusts stemmed in no salvation from hell in people, without repentance.

30. In an exhibit, I incorporate herein as Exhibit 6, I previously provided to this Court, the US Supreme Court, the Delaware Board, Delaware Chancery, and Delaware Supreme Court I stated:

“Due to the surgery referred herein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight each month. This is still a challenge. I must assert my right to live because people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. ‘I am not my own’ Other people are loved by God too.”

31. I had surgery more than 20 years ago, and I have to assert my right to live. I am very dehydrated, dangerously so now, and it has lasted beyond a week. I must be afforded time, an accommodation to sustain my life and health.

32. I used to drink a big gallon of water at the gym. Since the Delaware Supreme Court prevents me from returning to my former firm, I cannot afford to go to the gym. I have not been able to drink water or take time to care for my body as I should because of the time required to attend to this case and related proceedings.

33. Dehydration is serious. In undergrad at UD, I fainted during a class due to dehydration. When I awoke, no one was there but me. I was so embarrassed to discover I peed my pants, but at least I was not dead. Having enough water, and time to care for myself is required. It is not a disability to be human with individual unique limits. Nevertheless, I assert the ADA act’s requirements for access to the courts and accommodations, if applicable,

nevertheless. (42 U.S.C. §§ 12181- 12189)⁵ I should be afforded an accommodation to sustain my life and health as well as my licenses and liberty interests. The accommodation of a stay or more time does not prejudice opposing counsel or the Courts. Instead, it will likely prevent duplicity in work, requiring time I need to defend my liberty and sustain my life.

34. My First motion for additional time in the amount of 45 days to response to the PA-ODC's motion was denied.

35. This Court granted a second motion in the amount of 14 days, which is not sufficient under the circumstances. I am prejudiced.

36. After everything was rejected, I alerted the Clerk I would draft a new motion given the new facts and circumstances necessitating a stay and at least a continuation.

⁵ “Congress has abrogated states' sovereign immunity for cases that arise under Title II of the ADA if they implicate the "fundamental right of access to the courts." *Tennessee v. Lane*, 541 U.S. 509, 533-534 (2004).” *Reed v. Illinois*, No. 19-1164, at *4 (7th Cir. Jan. 9, 2020); *McDonough, Petitioner*, 457 Mass. 512, 519 n.16 (Mass. 2010) (“The United States Supreme Court has concluded that Title II of the ADA applies "to the class of cases implicating the fundamental right of access to the courts," and as such "constitutes a valid exercise of Congress' § 5 authority to enforce the guarantees of the Fourteenth Amendment" on the States. *Tennessee v. Lane*, 541 U.S. 509, 533-534 (2004) (ADA validly applies to States to extent that State court facilities are so constructed as to bar physical access to courts by individuals with disabilities).”); 42 U.S.C. § 12182 “(i) **Denial of participation**, It shall be discriminatory to subject an individual or class of individuals on the basis of a disability or disabilities of such individual or class, directly, or through contractual, **licensing**, or other arrangements, to a denial of the opportunity of the individual or class to participate in or benefit from the goods, services, facilities, privileges, advantages, or accommodations of an entity.”

42 U.S.C. § 12182 (a) “No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation.”

37. The Clerk understands my computer broke, and I noted I would draft a motion without delay for a continuation.

38. The Clerk cited the November 8, 2022 order that no further extensions would be considered, as to discourage my filing. And yet in other cases Courts state the same or similar language and still grant time to prevent manifest injustice and avoid procedural due process violations. See for example, *Mir v. Bureau of Pro. & Occupational Affs.*, No. 2557 C.D. 2015, 2016 WL 6407477, at *3 (Pa. Commw. Ct. Oct. 31, 2016).

39. Under my unique conditions denial of a stay is prejudicial and creates manifest prejudice towards my ability to plead.

40. My faith in Jesus and my ability to worship and exercise belief by the dictates of my conscience without government incited public or private persecution, but for my religious belief, is important to me to protect. Please grant a stay. I am tired. I need rest and water, but I cannot forgo the eternal rest in Jesus because of the limits of my body.

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

42. There is no prejudice towards the Plaintiff, third parties or the public by a delay, should a stay be granted. I agree not to practice law in this jurisdiction, without this court's authorization. I am retired in this jurisdiction. I require time and meaningful opportunity to not

only defend myself on appeal in the original proceeding, but also to present my case in the civil rights proceeding.

43. The public and third parties are not harmed by a stay. Yet, the public may be harmed if a stay is not granted, by setting a precedent that the state may eliminate Constitutional liberties in a government compelled exchange for the license to buy in sell in a profession. Every citizen, holding a license, may lose Constitutional rights or be in danger of being adjudicated disabled, for merely believing differently than the state, or for standing up for their religious-political beliefs in Court, should I not be granted meaningful opportunity to contest the original case on appeal to the US Supreme Court and in the civil rights case.

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

45. The Delaware Disciplinary proceeding is defective on its face. The record shows evidence of fraud, and collusion. (Exhibit 5). The Court was not partial, but instigated the proceeding against me and colluded with the state.

46. The Delaware Supreme Court's members concealed evidence in my favor to prejudice the fixed outcome against me in aid of the Delaware ODC. (Exhibit 5) The Court denied my requests for opportunity to perform discovery and for adequate time to prepare to hide the fact they terminated two court staff who are material to my case. The Court also secretly sealed four of my pleadings in Kelly v Trump that were material to my defense.

47. The Record also evidences the State's violations of my opportunity to be heard on ignored motions. The state ignored my motions to perform discovery, opportunity to prepare and present my case, opportunity to call and cross examine witnesses in the sham proceeding brought to cover up state Court misconduct and to punish me for the exercise of my First Amendment rights. I incorporate herein by reference my Reply to the DE-ODC's Response to my Objections to the Board's decision, excluding the voluminous exhibits, as Exhibit 5.

48. Despite having good cause to contest this reciprocal proceeding. Additional investigation is required. I lack time and resources to duplicate the investigation should a stay be denied. I am unemployed, unable to seek to return to my former law firm. I am left impoverished. My parents indicated they are not able to help me as much as they would like, during this economic down turn. My parents actually indicated they may cut me out of their will because they have helped me this past year to a greater extent than my siblings.

Procedural Background of this case

49. This reciprocal proceeding was brought on or about August 30, 2022, in response to the Delaware Supreme Court's decision to place my license to practice law on disabled inactive on August 10, 2022.

50. I received a letter from this Court, dated August 30, 2022, concerning notice of discipline.

51. On September 21, 2022, this Court filed notice and an Order.

52. On or about October 7, 2022, I sent the Court by US mail, *Respondent Meghan M Kelly's Motion to stay the Proceeding until the conclusion of both Respondent's originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations*

are made or the time of appeal has lapsed. Respondent further moves the Court, for good cause for permission to file the "for cause" motion 30 days after the stay is lifted, with attachments I incorporate herein in its entirety. The Court received and filed this motion on October 12, 2022, almost a week later.

53. I followed up with the assigned case manager on the Court's receipt of my Motion to stay the proceeding. The case manager indicated that things would be expedited given the nature of my case. I thought in my mind this was even before the Court granted me an opportunity to be heard on the motion for a stay, to slow down the case, as if the Court has already made a finding even before reading my motion.

54. The Court's determination without granting me an opportunity to be heard on my motion for a stay does violate my right to be heard. US Amend. I and XIV.

55. Denial of the stay denies me of time I require for meaningful access to the courts in defense of my First Amendment rights and property interest in my retired license and other interests which may be affected should that interest be changed.

56. Denial of the stay denies me of time I require to protect my property interest in my retired license, which will affect other property interests and my ability to work as an attorney in Delaware should I be placed on reciprocal discipline, even if the Delaware decision is vacated.

57. This Court and the public have no interest in my retired PA license.

58. I am not admitted to this bar. I must seek readmission before I am licensed and given permission to practice law before this Pennsylvania Bar and this Honorable Court.

59. The October 8, 2022 Order denying my application of a stay violates my meaningful access to the courts in violation of the 14th Amendment and the First Amendment rights I seek to defend.

60. On October 17, 2022, Pennsylvania Disciplinary Counsel Anthony P. Sodroski, Esquire (Herein referred to as “PA ODC”) provided an answer to my motion for a stay.

61. On October 18, 2022, PA ODC supplied a supplemental answer containing the status of the matter in my federal civil rights case where I seek inter alias to overturn the original disciplinary order.

62. On October 19, 2022, I filed Respondent Meghan Kelly’s Motion for good cause to waive court costs by the Clerk and this Court including costs under Pennsylvania Rules of Disciplinary Enforcement 208, record, transcript fees, filing fees and other costs, I incorporate herein by reference.

63. On October 26, 2022, I filed a Motion to File unconfirming documents pursuant to Pa.R.A.P. 105(b), I incorporate herein by reference.

64. On October 26, 2022, PA ODC filed an Answer in response to my motion to waive costs, including costs by the ODC. The ODC’s answers evade the fact I asked this Court to waive costs by the state’s agent the ODC too. So, his response is not in opposition, but misleads the Court, unless the Court finds my motion was not specific.

65. My motion for reargument on the costs and the prohibition against 13th Amendment and compelled religious violations are more specific. It is against my religious beliefs to owe debts by forced will. I believe it leads to damnation in hell, as I previously tried to convey to PA-ODC and this Court in my pleadings.

66. My religious beliefs are private and do not conform to the religious beliefs of entities or the majority of others. My religious beliefs are genuine.

67. I will love and respect others who hold different religious-political beliefs. I will not encourage beliefs that I believe misleads people to harm and hell because I care about people. I do not want other people to lose eternal life. I can love others and believe differently. I can love others and disagree with them. Holding beliefs of my own does not make me dangerous, nor does sharing my genuine religious beliefs with others. I am not in government. It would be wrong should I use God's name for political vanity. I am a private citizen.

68. On November 3, 2022, I filed Respondent's Motion for an extension of time to respond to PA Disciplinary Counsel's Answer in opposition to my Motion for a stay, I incorporate herein by reference in its entirety.

69. On November 6, 2022, I filed Respondent's Motion to dismiss the disciplinary proceeding, without prejudice for lack of subject matter jurisdiction, I incorporate herein by reference.

70. On November 7, 2022, PA ODC filed an answer in opposition of my motion to file unforming documents.

71. On November 7, 2022, PA ODC filed an answer in opposition to my motion for a stay.

72. On November 7, 2022, I filed an Application to Amend the Application to Dismiss, I incorporate herein by reference.

73. On November 8, 2022, this Court entered an Order, I incorporate herein as reference and attach as Exhibit 7, which held:

“the Application to Waive Costs is dismissed as moot. The Motion to File Unconforming Pleadings is granted. See Pa.R.A.P. 124(b). The Motion to Stay the Proceeding is denied. Respondent is afforded an additional 30 days from the date of this Order to inform this Court of any grounds against the imposition of the identical or comparable discipline in this Commonwealth.”

66. On November 8, 2022, the Court dismissed my Motion for an extension of time in the amount of 45 days to respond to PA ODC’s answer in Opposition to Motion for Stay dismissed as Moot.

67. On November 10, 2022, PA ODC filed an Answer Opposing Respondent's Motion to Dismiss.

68. On November 10, 2022, PA ODC filed a separate Answer to Respondent's Application to Amend Respondent's Motion to Dismiss.

69. On November 12, 2022 I filed corrections by submitting *Respondent Meghan Kelly’s Motion to correct errors in her Motion to Dismiss* filed on or about November 6, 2022, I incorporate herein by reference.

70. The November 8, 2022 Order did not address all my requests. I sought to waive costs by PA ODC too under Pennsylvania Rules of Disciplinary Enforcement 208 (g), in addition to court costs, other costs and transcript fees for appeal, in order not to be compelled to violate my religious beliefs, cause a substantial burden upon my access to the courts or compelled to involuntary servitude in violate of US Amendments I, XIII, and XIV. This Court erred by ordering my motion was moot.

71. On or about November 15, 2022, I filed Respondent Meghan M Kelly's Motion for reargument on this Court's indirect denial of my motion for a stay to prevent a government compelled obstacle to my access to other courts in defense of irreparable injury to my life, First Amendment liberty interests, my license, and eternal life and a denial of my motion to exempt costs as moot, I incorporate herein in its entirety. I accidentally submitted arguments I drafted for another reciprocating disciplinary Court, the District Court for the Eastern District of PA. This Court did not indirectly deny my motion.

72. I also argue denial of the time a stay is also affecting my health, in light of my need for time to drink water and rest due to harmful healthcare against my person in my youth that I alleviate by taking needed time to sustain my health and life. (See Exhibit 8, my letter to the Clerk of the Third Circuit referring to my surgery in my youth, dated December 2, 2022. I am not misleading this Court when I state I need time and rest to prevent harm to my health. I am not ashamed of being weak. My weakness does not make me unworthy of work as an attorney who desires to return to her former firm to perform real estate settlements.) (See, Exhibit 6, containing evidence of my surgery, and a state of Delaware proposal to improve our harmful healthcare and a federal proposal to reduce costs of healthcare.)

73. I am not able to get adequate rest and fluids because of the increase in workload and other stress caused by this needless litigation.⁶

⁶ Please note, the Delaware Disciplinary Counsel cared naught about my health and compelled me to attend a hearing ill, recovering from the shingles. They were concerned with my religious political beliefs. They note, my references to the Bible and my belief that courts are for correction as reasons finding me unworthy to hold an active Delaware license to practice law. See Exhibit 6.

74. This improvident law suit creates an obstacle to my access to other courts in defense of my First Amendment rights and property interests in my license to practice law.

75. On November 18, 2022, PA ODC filed an Answer Opposing my application for reconsideration on my denial to waive costs and motion for a stay.

76. On November 19, 2022, I filed Respondent Meghan M Kelly's Motion to supplement the record with new and additional information and to correct an error in belief, I incorporate herein by reference in its entirety.

77. On November 21, 2022, I filed Respondent Meghan M. Kelly's Motion for an exemption from the requirement to serve paper copies of pleadings with this Court pursuant to Pa. R.A.P. 105 and permission to serve this Court electronically, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness

78. On November 29, 2022, I filed a Motion for an extension of time to file a response to the Court's Order dated October 8, 2022.

79. On November 30, 2022, the Court granted my motion and extended the deadline to December 23, 2022.

80. This extension is not an adequate amount of time to defend my license under the facts of this unique case.

81. On December 5, 2022, I submitted Respondent Meghan Kelly's Response to Office of Disciplinary Counsel's Answer opposing dismissal of the disciplinary proceeding for lack of subject matter jurisdiction.

82. On December 5, 2022, I also filed the certificate of service and a letter containing video exhibits on memory sticks I mailed to this Court and PA ODC. This was rejected, but I hope this Court accepts it on receipt because I incorporate it in an accepted pleading.

83. The Court rejected both items I filed on December 5, 2022.

84. I knew that questions relating to subject matter may be brought at any time, and there remained questions about subject matter jurisdiction. *See, Daly v. Sch. Dist. of Darby Twp.*, 434 Pa. 286, 252 A.2d 638 (1969) (“This Honorable Pennsylvania Supreme Court held “Lack of subject matter jurisdiction may be raised at any time by parties or sua sponte by Supreme Court.”); (Also see, *Martin v. Zoning Hearing Bd. of W. Vincent Twp.*, 230 A.3d 540, 545 (Pa. Cmmw. Ct. 2020), Questions of subject matter jurisdiction may be raised at any time, even on appeal, by the parties, or by the court on its own motion.” (emphasis intended, especially with regards to questions of the case law PA-ODC cites, which are distinguished from this case)); *See, Hudson v. Com*, 830 A.2d 594, 598 n.7 (Pa. Cmmw. Ct. 2003), *Citing, Dep't of Transp., Bureau of Driver Licensing v. Gelormino*, 636 A.2d 224 (Pa.Cmwlt. 1994).

85. So, I immediately drafted a Second Motion to Dismiss which included additional information relating to the facts concerning why failing to dismiss harms me and regarding legal issues. I filed the Second Motion to Dismiss on December 6, 2022, I incorporate herein by reference. This Second Motion to dismiss is different from the First Motion to Dismiss.

86. I face immediate irreparable injury and am asserting rights, without perfection in order not to waive them. I saw I referred to the video clip evidence in the incorrect paragraph and minor typos.

87. I drafted a Second corrected Motion to dismiss based on lack of subject matter jurisdiction to correct the reference to the video exhibit and to correct minor typos, I incorporate herein by reference.

88. On November 29, 2022, I filed a Motion for an extension of time to file a response to the Court's Order dated October 8, 2022.

89. On November 30, 2022, the Court granted my motion and extended the deadline to December 23, 2022.

90. This extension is not an adequate amount of time to defend my license under the facts of this unique case. I am prejudiced and denied meaningful opportunity to defend my retired license, related interests, and Constitutional interests.

91. A stay is required in order that I may acquire necessary to my defense.

92. A stay is also required to prevent needless duplicity of work when such information may be obtained in an open forum the civil rights case.

93. A stay is also required to prevent prejudice by a compelled denial of my Constitutional right to be heard in one forum in exchange with another.

94. A stay is also required to prevent prejudice by a compelled denial of my Constitutional right to religious belief against indebtedness and an economic substantial burden so great as to create a denial to access to the courts, when evidence and testimony may be gathered in one court rather than duplicating the same work in multiple courts

95. I should not be compelled to forgo the due process right to be heard in one forum in exchange with another.

96. A stay is required in order not to protect my life and health, and to prevent irreparable loss to my liberty interests, licenses and other interests.

97. The original order very likely will be overturned on appeal or in the civil rights case. Nevertheless, I asked for a continuation in the alternative. The Public, the Court and PA-ODC has no interest somehow more important to my potential loss to access to the courts, fundamental rights and loss of interests in licenses retired and others.

98. The amount of time this court extended is not enough for me under the circumstances.

II. Procedural Status on Delaware Disciplinary Order and Third Circuit Order with new and additional information with argument

99. I intend to appeal the Third Circuit reciprocal order, Eastern District of PA's reciprocal weird order, and the Delaware Supreme Court's original order.

100. I am an active member of the United States Supreme Court's Bar. I may be sued in a reciprocity law suit by the United States Supreme Court Rule. I am grateful the Supreme Court is not suing me now.

101. I do not have the time I require to effectively defend myself in this Case by an extension to December 23, 2022 either.

102. This Court must afford me adequate amount of time to plead affectively before this Court, the civil rights case and before the United States in order not to compel me to waive my right to defend myself, and lose the right to exercise my First Amendment rights of belief, exercise of belief, speech, association, the right to petition, and my property interests in my licenses to practice law. (See, US Amend I, XIV); (PA ST 2 Pa.C.S.A. § 504); (*Balfour Beatty*

Const. Inc. v. Department of Transp., 783 A.2d 901, Cmwlt.2001. Adjudicatory action may not be taken validly by a judicial or administrative tribunal except upon a hearing wherein each party has an opportunity to cross-examine witnesses, to introduce evidence on his own behalf, and to make argument.); (*Pennsylvania State Athletic Commission v. Bratton*, 112 A.2d 422, 177 Pa.Super. 598).

103. I assert my right for a meaningful opportunity to defend my license, and First Amendment liberties, without compelled economic and religious substantial burdens.

104. I am impoverished. The original disciplinary order prevents me from seeking to return to my former law firm where I would perform real estate settlements.

105. An order by this Court placing me on reciprocal discipline would prevent my opportunity to seek to return to my position even if the original Delaware Disciplinary Order is vacated.

106. I asked PA ODC if I could be placed back on retired status should this court place me on reciprocal discipline. I do not want to seek to be restated or admitted. I cannot afford the filing fees. It is against my religious beliefs. I do not have money to pay this Court to reinstate my retired status should the discipline be overturned on appeal to the US Supreme Court or in the civil rights case. (Exhibit 9). I do not want to be reinstated as active as I cannot afford the costs of bar due. PA-ODC did not respond.

107. I do not have the resources I require to fight all cases simultaneously. The appeal of the original disciplinary findings will likely make this Court's Order moot. I do not know how I will be able to afford postage, paper, ink or transportation to the Court. I need to research and read too.

108. The United States Supreme Court will likely hear my case either to discipline me as a member or to grant me equality under the law worthy of First Amendment belief, exercise of belief, speech, association and access to the Courts without punishment in violation of the equal protections clause based on disparate treatment with religious-political-poverty animus or denial of substantive and procedural due process of law. US Amend I, XIV.

109. Any decision this Court provides will affect this Court's decision. This case would be dismissed as moot should the Delaware Order be vacated, which will likely occur.

110. A denial of a stay prejudices me, and risks my loss of First Amendment rights, interest in my reputation, my property interest in licenses, and my ability to work.

111. My ability to work as an attorney may be taken away because the Delaware Courts disagree with my belief in Jesus Christ. The Courts will persecute me, not protect me should I face more government incited attacks for my religious-political beliefs, religious-political speech, religious-political exercise, religious-political affiliation and religious-political petitions.

112. Instead of upholding the Constitution, the Delaware Supreme Court and its arms in collusion violate the Constitution to protect the lie of the appearance of justice by the Delaware courts in my cases while creating injustice.

III Procedural Status on the Third Circuit Case with argument

113. Opposing Counsel filed a response to my appeal. I filed a motion objecting to her exhibit. A panel has convened to render an order on the motion. I have to brief a response before the Third Circuit.

IV. Arguments: A stay is required to allow me to gather testimony or other proof concerning procedural due process violations, bad faith, harassment, malicious religious-political-poverty animus and Court collusion in the original disciplinary law suit. This information is necessary to show cause why this Court must not reciprocate.

114. I must be afforded a meaningful opportunity to uncover questions of material fact necessary to my defense in this case regarding procedural due process violations, and other issues. I must be allowed the opportunity to gather testimony and evidence in order to respond to this Court's November 8, 2022 Order.

115. This Court must allow me meaningful opportunity to defend this Court's Order, and PA ODC's law suit against me by allowing me to gather facts, testimony and evidence in defense of my property interest and fundamental rights.

116. I was denied the opportunity to prepare, perform discovery and to call witness in the original disciplinary proceeding, in part because the Delaware Supreme participated in terminating a clerk of Court and a court staff to conceal or hide their testimony material to my defense.

117. This testimony and evidence are best retrieved in the civil rights case

118. Any testimony gathered, or evidence discovered or determinations in the civil rights case, Kelly v Swartz relating to the same subject matter, in addition to other subject matter, as to the State and its agents including the Court's bad faith, harassment, collusion, bias, or fraud, will affect the findings of facts and conclusion of law before this Court.

119. This Court must grant me an opportunity to gather material facts by testimony or otherwise material to my defense in the reciprocating Order by staying the proceeding.

120. As late as December 1, 2022, I discovered **additional procedural due process** defects and evidence of the Delaware Supreme Court's **collusion to fix the outcome of Kelly v Trump**. My religious-political petitions in this law suit are the admitted reason the DE-ODC petitioned to place my law suit on disability inactive.

121. There are questions of law that must be addressed. I filed a Motion to amend the complaint on or about January 24, 2022 in the civil rights case, to include additional damages, equitable relief, nominal relief and to add the Supreme Court justices as Defendants in this case.

122. I argued the state agents are not privileged or immune given the facts of my case. I incorporate herein by reference in its entirety A-4, A-5.

123. The unsettled questions require testimony or proof. This Court must stay the case to allow the gathering of facts in the civil rights case. This Court must stay this proceeding to allow me meaningful opportunity to be heard in defense of my retired interest in my license and my First Amendment rights by denying a stay. Citing, US Amend I, XIV.

124. I await for additional information by file and serve that will likely show the Clerk of the Delaware Supreme Court, Lisa Dolph (also referred herein as "Lisa") misrepresented the fact that the complete record is unsealed as the Court Ordered in its September 7, 2022 Order.

125. On September 7, 2022, the Delaware Supreme Court granted my motion to unseal the documents I attach hereto and incorporate herein in its entirety, as Exhibit 10, *Respondent Meghan Kelly's Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the*

law, and 3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th Protections.

126. The Delaware Supreme Court misrepresented my arguments in the September 7, 2022. I wanted the accused to have the choice of an open or closed proceeding to allow more fairness instead of secret fixed proceeding focused on serving business gain not individuals, individual liberty or the public.

127. Professional Boards do not serve or protect the public. Board members are partial to marketing professions, business, material gain and money as the goal of justice, which creates injustice.

128. There are questions of additional procedural due process violations that remain unanswered relating to how the Delaware Supreme Court acted as witness and judge in the Disciplinary proceeding in collusion with the arms or agents of the court.

129. It is notable my pleadings relating to attorney dues caused me to realize that the Supreme Court caused the interference in Kelly v Trump since DE-Lapp referred to them.

130. The Delaware Supreme Court's opinion cited a case regarding bar dues, appearing to value money over Constitutional liberties. *In re Bar of Supreme Court of Del.*, No. 58, at *9 n.14 (Del. Aug. 10, 2022) ("*In re Member of Bar*, 257 A.2d 382, 383 (Del. 1969)")

131. Any substantive or procedural defects in violation of the First and Fourteenth Amendment, collusion, bad faith or bias by the Delaware Courts or arms is relevant to whether this Court should render reciprocal discipline.

132. This court must grant me the opportunity to gather necessary evidence in defense of this reciprocal law suit by granting a stay. US Amend I, XIV.

133. I must be afforded the meaningful opportunity to prepare and present my case by allowing me to subpoena witnesses and cross examining them, and by discovery.

134. My January 15, 2022 motion before the Delaware Board to call a witness before the Board was denied by being ignored in part because the Court discharged that person from the court to protect the court, not the staff member.

135. The Court sought to hide the elimination of two witnesses to collude in fixing the proceeding against me by denying me the opportunity to perform discovery, call witnesses, and cross examine those witnesses.

136. This evidence is more fairly obtained in an open forum in the civil, where witnesses I expect to call Delaware Supreme Court judges.

137. I moved the civil rights court in January 2022, to include the judges as witnesses in an amended complaint, I sought to amend as a matter of right under Rule 15. Albeit, after his third Order, where he ignored this Motion, I moved to amend the complaint at a suspended time. I have since then, moved the court to amend the complaint again to include new and additional information and claims. DI 58 DE District Court, for example.

138. It is preferable and fairer to gather testimony in the civil rights case, rather than a closed forum needlessly increasing costs to the Court, witnesses and the party.

139. I assert my right to call witnesses and gather discovery in this Court even if this Court continues to wrongly deny a stay which prejudices me, for no necessary reason somehow more important than the loss of my fundamental rights and property interests in my license harmed but for my exercise of my rights.

140. The Pennsylvania Supreme Court must grant a stay to protect my 14th and 1st Amendment meaningful access to the courts, from a substantial burden upon me due to my poverty and religious objection to debt. A stay must be granted to allow me to gather facts to show the truth of the matter by facts and law to defend my liberty, life, eternal life and licenses.

141. The evidence shows the Delaware Supreme Court violated proper procedures and was the source of the disciplinary law suit. I incorporate herein by reference in its entirety Exhibits A-4, and A-5 which outline procedural due process violations in Kelly v Trump, and my pleadings showing belief that a Delaware Supreme Court justice incited the attacks by the state against me during Kelly v Trump to cause me to forgo my Freedom of Religion Restoration Act Law suit in violation of federal law, and the Constitution. See 42 USC Section 1985, US Amend I, XIV.

142. In February, 2022, per the email I attached to another pleading before this PA Supreme Court, it appears all of the justices instead of merely one judge instigated or participated in inciting the proceeding against me as witness, judge and jury.

143. The Supreme Court was in receipt of my petitions for exemptions from bar dues.

144. Per DE-Lapp's letter, my request for an exemption from bar dues was the admitted reason this arm of the Delaware Court attacked me in May 2021, in interference with Kelly v Trump. (A-4, A-5, please refer to the letter)

145. The only people in possession of those petitions for relief from bar dues for all attorneys facing economic hardship, not merely me, in order not to violate the Equal Protections Clause of the 14th Amendment by favorable or disparate treatment towards me was DE-ODC's Kathleen Vavala's Uncle at the Delaware Bar Association, Mark Vavala, and the members of the Delaware Supreme Court and their staff.

146. To my knowledge at that time in 2021, no other person was aware of my petitions for bar due exemptions.

147. Albeit a Judge of another Delaware Court, Judge Clark alluded to my economic hardship request when he attacked me in interference of Kelly v Trump.

148. A Court of Common Pleas judge, Judge Clark attacked me first, before DE-Lapp.

149. I alleged in Kelly v Trump I esteemed Judge Clark in my complaint against President Trump. So, it appears members or agents of Chancery or Delaware Supreme Court made a request to Judge Clark. It was someone who read my complaints who incited the attacks.

150. At BJ's a bulk grocery store, sometime in April 2021, Judge Clark appeared to investigate me and threaten me because of my religious-political speech contained in my petitions. (Exhibits, A-4, A-5). If I recall correctly, he feigned concern about money or bar fees. Judge Kenneth Clark also admitted he interrogated me at DE ODC's request.

151. I asked Judge Clark if the DE ODC requested, he contact me. He responded by shaking his head up and down.

152. This Court must grant a stay so as not to violate my right to a fair proceeding to provide arguments on the defenses permitted by Pa.R.D.E., Rule 216 (c) because there are questions of Disciplinary forum partiality and material fact necessary for me to gather to answer this Honorable Court's order in my defense against this reciprocating law suit.

153. This court must allow me opportunity to meaningfully defend myself before this Court in accordance to the 1st and 14th Amendment.

154. I learned of facts material to my defense as late as December 1, 2022. I am not sitting on this. I am not delaying in bad faith. I am seeking to uncover truth.

155. Sadly, I provided inaccurate information to the Delaware District Court I corrected to provide more heinous conduct by the Delaware Supreme Court.

V. New and additional information affecting this Court's Determination arose after this Court's November 8th Order that could not have been discovered by due diligence which is material to this case and to the issue of whether a stay must be granted.

156. The Delaware Supreme Court placed my license to practice law on disability inactive to punish me for my religious beliefs, contained in my petitions and in response to my exercise of my right to access to the Courts to defend my First Amendment exercise of religious belief from a government compelled substantial burden in Kelly v Trump.

157. The Delaware Supreme Court also punished me in retaliation for my petitions to exempt bar dues for all Delaware Attorneys facing economic hardship. In one of its disciplinary orders against my license the Court specifically refers to a case regarding bar dues.

158. Money gathered by bar dues, I paid in 2021 is not more important than preempting Constitutional law, and federal law. U.S. Const. art. VI., § 2.

159. The Delaware Supreme Court erred by violating my First Amendment and other Constitutional rights, to serve the **mere money**, or the appearance of justice while committing grave injustice against me and others, by precedent by instituting a discipline suit against me based on religious-political-poverty animus, by sealing documents without notice or an opportunity to be heard in Kelly v Trump, by denying me meaningful opportunity to plead my case in the disciplinary case, and by firing two court staff to prevent their testimony in my defense.

160. I requested that all attorneys similarly situated be treated the same by affording grace to all, not merely me, so as not to violate the Equal Protections Clause. Citing A-4 and A-5.

161. I paid the Delaware bar due for 2021 in a timely fashion. Citing A-4 and A-5 which includes proof of payment.

162. The state admits that my religious speech contained in my Religious Freedom Restoration Act petitions to safeguard my religious exercise is the source of the disciplinary law suit in the Delaware Office of Disciplinary Counsel's ("DE ODC") letter dated August 23, 2022, and in its petition against me at Paragraph 7, I incorporate herein by reference as Exhibits 1 and

2.⁷ I believe that people sin when they seek money as savior in place of God which is not a popular belief when the world praises what I believe to be the the mark of the beast or lawlessness or damnation without repentance, business greed.

163. Earlier this year the United States Supreme Court granted a government employed coach freedom to exercise religious-speech and religious exercise, without government retaliation or persecution, but for the football coaches exercise of religious belief.

164. The United States Supreme Court in *Kennedy v. Bremerton Sch. Dist.*, 213 L. Ed. 2d 755, 142 S. Ct. 2407 (2022) held, “The Free Exercise and Free Speech Clauses of the First Amendment work in tandem: where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities. U.S. Const. Amend. 1.

165. I am a private not a government actor, like the football coach. I should be offered the same Constitutional protections afforded to private citizens or government citizens acting allegedly in his private capacity, as the court found.

166. I desired to exercise my private Constitutional rights, including but not limited to access to the Courts to defend my exercise of religious exercise from government substantial burden. I let go of the idea of running for office when I received threats to my person and property based on my religious-political belief when I chose to file a law suit against former President Trump. My faith in Jesus is even more important than my desire to draft just laws to

⁷ See, *Mountain Environment v. District Court*, 677 P.2d 1361, 1364-65 (Colo. 1984) “The right to petition has been characterized as one of “the most precious of the liberties safeguarded by the Bill of Rights.” *United Mine Workers v. Illinois State Bar Association*, 389 U.S. 217, 222, 88 S. Ct. 353, 356, 19 L.Ed.2d 426, 430 (1967).”

care for people, while protecting their liberty to say my ideas are bad as opposed to oppress to control, or to control by enticing tempting rewards.

167. Delaware court agents mistreated me and disparately treated me based on political-religious-or poverty animus.

168. I motioned the Court for help concerning the disparate treatment, and the Court not only sealed my pleas for help, it also punished me by instituting proceedings against me in interference of Kelly v Trump, while the case in which I was a party was ongoing.

169. The Delaware Supreme Court also instigated the disciplinary law suit and upon information and belief participated in the preliminary hearing as witness, and judge, to cover up state Court misconduct. (See Exhibits A-3, A-4, A-5)

170. Until around or about December 1, 2022, I believed the Delaware Supreme Court sealed my motions and A-4 and A-5 on the date of the preliminary hearing to fix the outcome by concealing evidence material to my defense.

171. Upon information and belief, I learned the Delaware Supreme Court more heinously sealed these documents during my live case, Kelly v Trump, to prevent a mistrial, and to prevent the US Supreme Court and others from seeing my pleas, and to knowingly prejudice the Delaware disciplinary proceeding against me.

172. According to the Docket provided by Court Link attached to my First Motion for a stay, the Docket was accessed by the Delaware Supreme Court on the date of the preliminary hearing, November 3, 2022.

173. It processes the date of changes or access the next day. If you look at the top of the Court Link document it indicates it was last retrieved on November 4, 2022, meaning it was actually retrieved on November 3, 2022.

174. All of this time I thought the Delaware Supreme Court sealed my petitions relating to the contents in the attached A-4, and A-5 on the date of the preliminary hearing to conceal evidence necessary to my defense.

175. A-4 and A-5, previously incorporated herein and attached hereto, contains two pleadings that the Delaware Supreme Court secretly sealed to conceal my complaints concerning State agent and court agent attacks against me in violation of my procedural due process rights to affect the outcome of Kelly v Trump, as A-4 and A-5.

176. It appears the Delaware Supreme Court or its agent may actually have attended, aided in or participated in the preliminary hearing as witness and judge instead of merely sealing the documents.

177. To my horror, on or about December 1, 2022, I reviewed the attached graph included herein as Exhibit 11, hereto from file and serve.

178. File and serve is the docketing service the Delaware Supreme Court uses.

179. The Delaware Supreme Court sealed pleadings material to my defense to prevent a mistrial and to prevent the US Supreme Court from seeing the procedural due process complaints I made I incorporate and include herein by reference in Exhibits A-4 and A-5, attached hereto.

180. The Delaware Supreme Court also sealed to the documents to collude in fixing the Delaware Disciplinary proceeding against me. The other documents appeared public. It was only the documents necessary to my defense that were hidden.

181. According to the graph the file and serve representative provided, these documents were unsealed after my Board proceeding in response to my complaints to the Clerk of Court.

182. I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State.⁸

183. Third Circuit Judge Bright's, concurring in part and dissenting in part in *U.S. v. Wecht*, 484 F.3d 194, 221, 226 (3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

184. In my case the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state.

"When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure." *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); See *United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

⁸ (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Constitution. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs.*, 800 F.2d 339, 343 (3d Cir. 1986).

185. In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, DI 16, 21, 40, 41, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

186. The Delaware Supreme Court sealed the 4 separate entries or group of entries I noted in Exhibit A-3, including but not limited to:

1. Exhibit A-4, Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just,
2. Internal Exhibit thereto, including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court's staff based on religious belief, political association or poverty; emails,
3. Internal Exhibit, Oct 19, 2020 letter to Patricia Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email,
4. Internal Exhibit, letter dated May 21, 2020
5. Internal Exhibit A-5, Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation,
6. Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship,
7. Internal Exhibit Feb. 5, 2021 letter request for relief from bar dues, my concerns relating to recent US Supreme Court cases;
8. Internal Exhibit, previously sealed pleading Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, and exhibits thereto
9. Internal Exhibit, previously sealed pleading Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto.

187. The file and serve graph indicates *Appellant's motion for the Delaware Supreme Court to Reign in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just* was sealed on May

27, 2021. It appears to be remaining on seal as of 2:52 PM that date. See Exhibit M Attached hereto incorporated herein.

188. Appellant's Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter was sealed May 27, 2022, and remains sealed.

189. A-4 and A-5 appear to be sealed at this time too, per Exhibit M.

190. The Delaware Supreme Court Clerk and staff misled me before on multiple occasions. They alleged the documents were unsealed.

191. It is likely, Delaware Supreme Court judges ordered them to tell me this. I must be afforded opportunity to find out the truth concerning why the staff would be directed to misrepresent the truth to me.

192. I alerted DE-ODC of the problem per the attached emails I forwarded to PA-ODC, incorporated herein as Exhibit N.

193. The File and serve staff were not available for additional questions and is out of the office, but there appears to be concealing of documents in the disciplinary matter too.

194. The new procedural due process violations are material to my defense of this Court's reciprocation.

195. I await for additional information from file and serve which is material to my defenses before this Honorable Pennsylvania Supreme Court.

196. I seek additional evidence and answers on bad faith of the Delaware Supreme Court or its arms motive, Delaware Supreme Court partiality towards the state, procedural due

process violations, religious-political animus, collusion to fix the outcome in the original disciplinary proceeding and in Kelly v Trump, and to cover up state misconduct is material to this Court's reciprocal determination.

197. This reciprocating law suit is based on a Delaware Supreme Court Order placing my license to practice law on disability inactive.

198. Any additional information showing the reciprocating Court's Order must not be adopted by this Court is material to this case.

199. New information arose that could not have been discovered with due diligence before this Court's November 8, 2022 Order denying my request for a stay.

200. This Honorable Court must afford me 1st and 14th Procedural due process by modifying its Order pursuant to 42 Pa. Stat. and Cons. Stat. Ann. § 5505 to allow a stay, in light of the new and additional information showing procedural defects in the disciplinary proceeding, bad faith, collusion and the need for me to gather truth to defend myself before this Honorable Court should this case not be dismissed.

VI This Court erred as a matter of law, and as a matter of fact creating manifest injustice against me by denying my Motion to Stay the case, especially in light of additional facts.

201. This Court erred as a matter of law, and as a matter of fact creating manifest injustice against me by denying my Motion to Stay the case, especially in light of additional facts.

201. This Court made no finding of fact that the Court's interest or the public's interest or any other person's interests outweighs the harms towards me by denial of the stay.

202. This Court did not provide a finding on how denial of a stay in this case is somehow more important than the immediate irreparable, real not abstract loss of my Fundamental rights including but not limited to my 1st Amendment right of religious belief, First Amendment religious speech, First Amendment right of religious-political and professional affiliation, First Amendment religious exercise or my interest in my retired license.

203. This Court did not analyze how a change on the status of my retired license will cause hardship should it be placed on disability inactive needlessly or without adequate time for me to defend myself.

204. An Order of reciprocal discipline foreseeably affects my other property interests beyond rendering it more difficult for me to seek readmission to practice law from my retired status.

205. It reenforces additional punishment against me for the exercise of my First Amendment rights so as to chill me and others by precedent.

206. Denying a stay deprives me of meaningful opportunity to be heard making it more difficult to defend my liberty, and license.

207. Should this Court impose a reciprocating order, without granting a stay, it will make it more difficult for me to find work as an attorney in Delaware, even if I am able to vacate the original order.

208. An outcome may also affect my ability to fight in a fairer and open forum where I am more freely able to gather testimony by opposing parties without the costs or duplicity and additional costs for all courts involved.

209. My appeal of the original Delaware disciplinary order or the Civil rights proceeding Kelly v Swartz, 21-1490, will likely make this Court's reciprocal proceeding moot. I seek to move the Delaware District Court to vacate the original Delaware disciplinary order as voidable, due to procedural due process violations and other constitutional violations. (US Amend I, XIV).

210. The source of this Court's potential discipline may be nullified. Therefore, I request this Court conserve its own resources in the interest of justice until completion of the civil rights case and appeal of the original disciplinary matter before the Honorable Supreme Court, or until the time for appeal has lapsed.

211. Proceeding with this disciplinary proceeding without a stay would also cause a substantial burden upon my access to other courts, due to my limited resources in terms of time, money and material.

212. I am unemployed, and I am impoverished.

213. Continuing with this reciprocal proceeding, without a stay before the litigation on appeal of the original disciplinary proceeding and the civil rights case is complete including appeals to the United States Supreme Court or until the time of appeal has lapsed would create an economic burden so great as to deny me access to this court and other courts to defend my First Amendment rights. (US Amend I, V).

214. I also have religious objections to indebtedness. Continuing this proceeding without a stay would force me into likely needless debt requiring I violate my religious beliefs in order to defend my liberty to exercise religious beliefs without government retaliation or forgo my access to the Courts, my First Amendment rights and my property interests in my licenses, and relief from other harm.

215. There is no compelling reason to deny my request for a stay. The public and parties are not prejudiced by my request. I am not practicing law in any jurisdiction. Nor is any justification narrowly tailored to meet any compelling reason. This Court may stay a reciprocal case, with no prejudice, while potentially avoiding needless work for this court, the appellate courts and the parties in related cases.

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

217. The public may also be harmed if a stay is not granted, by setting a precedent that the state may eliminate Constitutional liberties in a government compelled exchange for the license to buy and sell in a profession. Every citizen holding a license may lose Constitutional rights or be in danger of being adjudicated disabled for merely believing differently than the state, or for standing up for their religious-political beliefs in Court, should I not be granted meaningful opportunity to contest the original case on appeal to the US Supreme Court and in the civil rights case, which may also be appeal to the Honorable United States Supreme Court.

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

219. The Delaware Disciplinary proceeding is defective on its face. The record shows evidence of fraud, and collusion. The Delaware Supreme Court's members concealed evidence in my favor to prejudice the fixed outcome against me in aid of the Delaware ODC. The Court denied my requests for opportunity to perform discovery and for adequate time to prepare to hide the fact they terminated two court staff who are material to my case. The Court also secretly sealed four of my pleadings in Kelly v Trump that were material to my defense. My request to call one of the terminated employees was ignored and indirectly denied.

220. Despite having good cause to contest a reciprocal proceeding by this Honorable Pennsylvania Supreme Court, I lack time and resources to appeal the original DE disciplinary proceeding, the civil rights case, while fending off reciprocal cases, which may also be appealed. I am unemployed. I am unable to seek to return to my former law firm. I am left impoverished. My parents indicated they are not able to help me as much as they would like, during this economic down turn.

221. I do not have the time, ability or resources to fight all cases all at once. In the interest of justice, and for good cause, I request this Honorable court preserve the right for my meaningful opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

Wherefore I pray this Court grants this Motion.

Dated: Dec 19, 2022

Respectfully submitted,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
Retired Bar No. 202268, INACTIVE, not practicing
law

Appendix X

Re: 21-3198/219 Meghan's denied amn opportunity to be heard by the refusal of the court to docket pleadings based on my religious beliefs and voluminous amount of evidence necessary to defend my life and liberty

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme.grievanceofficer@pacourts.us; anthony.sodroski@pacourts.us; david.weiss@usdoj.gov; supreme.grievanceofficer@pacourts.us; meghankellyesq@yahoo.com

Date: Friday, December 23, 2022 at 09:58 AM EST

Good morning,

I am quite prejudiced by the denial of an opportunity to be heard, not for procedural grounds but based on bad faith denial due to the voluminous amount of documents I require to submit to show years of disparate treatment by the state of Delaware towards me based on my assertion of religious petitions.

It appears the Court in bad faith is not docketing additional motions based on disdain towards my religious beliefs contained therein, and due to the volume.

I attempted to prevent the duplicity of work by filing a motion for a stay, which was wrongly denied. I alerted the court to the voluminous amount of documents necessary to my defense. I submitted a Second Motion for a stay with matters unrelated to the first motion.

John Vasco said I could resubmit the motions, but I am prejudiced in that I do not have time as I am drafting a document due today. He in bad faith indicated he rejected the documents without thoroughly reviewing them assuming they were already granted, when I asked for additional relief including including a motion to prevent costs or expenses to PA ODC and a motion to accept non-conforming documents and documents the courts refused to docket necessary to my defense of life and liberty and my retired license.

I am denied an opportunity to be heard when my pleadings are not docketed. I am asking for the opportunity at justice, not the guarantee. That opportunity is denied when my pleadings are not docketed, without proper reason under the rules, in light of my different requests to file nonconforming pleadings, the denial of pleadings despite that apparent grant. I asked for a different request under 105 today. It remains docketed.

I filed items today that were rejected without valid reason. I write you in case this issue is not resolved by the end of the day, when everything is due.

Regards,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939

meghankellyesq@yahoo.com
(302) 493-6693

retired 202268

Appendix Y

Denied help Re: 21-3198/219 dd3 Fw: Americans with Disabilities Act Accommodation (ADA) Title II Request for Reasonable Accommodation Case No 2913 dd3

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme.grievanceofficer@pacourts.us; wdada.coordinator@pacourts.us; anthony.sodroski@pacourts.us; david.weiss@usdoj.gov; supreme.grievanceofficer@pacourts.us; meghankellyesq@yahoo.com

Date: Thursday, December 22, 2022 at 11:03 AM EST

Dear Sirs and Madams,

The Court denied an extension in the amount of 45 days. I am not sure what you are looking at for a second grant of an extension. 14 days is inadequate under the circumstances.

I am prejudiced. This Court has notice I could not stand at the post office due to severe dehydration related to a surgery. I assert my right to live by seeking an accommodations. It appears I attempted to file it with the court correctly, but it remains undocketed.

This Court has notice of my medical records, but it is more concerned with costs and convenience than justice. Justice is not a matter of business and barter or exchange, but a matter of truth under the law.

Claimants without means or with limited ability should be afforded access to the courts without denial of an opportunity to be heard by the court's failure to docket the items.

I thank you for your consideration and getting back to me. Have a good day.

Regards,
Meg

On Thursday, December 22, 2022 at 10:54:03 AM EST, Supreme Grievance Officer <supreme.grievanceofficer@pacourts.us> wrote:

Dear Ms. Kelly,

A review of your communication regarding an alleged ADA request has taken place. Please be advised that the Grievance email is to be used only when a party has filed a proper request for an accommodation with a Supreme Court Coordinator and has been denied said request. Records reveal that the rejected filing you take issue with, is in regards to an active Disciplinary matter concerning yourself.

As you should be aware, the courts cannot administratively grant, as an ADA accommodation requests that impact court procedures within a specific case. Thus any extension of time requests are not properly made to the ADA Coordinator or Grievance Officer, but on the matter docketed at 2913 DD3. There the Court may consider an individual's disability, along with other relevant factors, in granting or denying the motion. However; it is noted that the Court already granted two extensions as evidenced in its 11/8/2022 and 11/30/2022 orders and in its last order specifically stated that no further extension request will be entertained. Thus, a Response to the Notice and Order dated August 10, 2022 is due to be filed at 2913 DD3 on or before December 23, 2022 and the Western District appropriately rejected any filings that were not said.

Regards,

Regards,

Irene M. Bizzoso

Supreme Court Grievance Officer

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, December 21, 2022 3:44 PM
To: Supreme Grievance Officer <Supreme.GrievanceOfficer@pacourts.us>; WDADA Coordinator <WDADA.Coordinator@pacourts.us>; Anthony Sodroski <Anthony.Sodroski@pacourts.us>; Meg Kelly <meghankellyesq@yahoo.com>; david.weiss@usdoj.gov
Subject: 21-3198/219 dd3 Fw: Americans with Disabilities Act Accommodation (ADA) Title II Request for Reasonable Accommodation Case No 2913 dd3

CAUTION: This is an external email. Please think before you click on an attachment or link!

Good afternoon,

I left a voice message with

Angharad Stock	Allegheny County Courthouse 300 Frick Building 437 Grant Street Pittsburgh, PA 15219	phone: 412-350-3877 email: courtaccess@alleghenycourts.us
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The ADA Coordinator for grievances in Allegheny County is not going to be available until January 4, 2022, per her message. This is too late to prevent irreparable injury.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Not acting as an attorney

Retired License 202268

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: courtaccess@allegheycourts.us <courtaccess@allegheycourts.us>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Anthony Sodroski <anthony.sodroski@pacourts.us>; WDADACoordinator@pacourts.us <wdadacoordinator@pacourts.us>; david.weiss@usdoj.gov <david.weiss@usdoj.gov>
Sent: Wednesday, December 21, 2022 at 03:13:16 PM EST
Subject: Americans with Disabilities Act Accommodation (ADA) Title II Request for Reasonable Accommodation Case No 2913 dd3

Dear Sirs and Madams,

A reciprocal law suit was filed against me, based on an original law suit alleging my religious-political beliefs in God not money as God and guide is evidence of a disability. I seek to contest that. I believe differently, and I have religious beliefs against healthcare and mental healthcare.

I require an accommodation in the form of a stay to protect my life and health due to a limitation.

I studied healthcare law and finance at Duquesne School of Law. I believe people not only are harmed but also lose eternal life in hell because of our bad healthcare. I especially oppose drugs that allegedly help people feel better by feeling nothing. Drugs often inhibit people's faculties. It is my religious belief people must use their brain to go to heaven. I believe that people go to hell for not using their brains, not knowing, for their belief in a lie, their misunderstanding, for doing what they are trained to do, told to do should they harden their hearts towards loving others for their love of money as God to care for their own, without repentance.

I believe healthcare would improve if judges judged the experts instead of making them like God, allowing their opinions and practices to be above the law, by submitting their testimony as the standard. The bad standards are never corrected by the courts when judges allow business professionals collective uniform standard to be the standard of the law.

I have many religious objections to healthcare and mental healthcare. Nevertheless, I assert my right to live.

Attached, please find documents the PA Supreme Court refused to submit including an ADA claim.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

302) 493-6693

acting as a party not as an attorney

meghankellyesq@yahoo.com

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: SupremeGrievanceOfficer@pacourts.us <supremegrievanceofficer@pacourts.us>;
WDADACoordinator@pacourts.us <wdadacoordinator@pacourts.us>

Cc: Meg Kelly <meghankellyesq@yahoo.com>; Anthony Sodroski <anthony.sodroski@pacourts.us>

Sent: Wednesday, December 21, 2022 at 01:52:43 PM EST

Subject: 2913 dd3 /Fw: "Answer to Application for Emergency Relief" filing WSUPWD01363707 rejected for case "In the Matter of: Meghan Marie Kelly" (2913 DD3)

Dear Sirs or Madams,

I attempted to file the document rejected associated with the docket entry items referred to below. I sought an accommodation under the ADA. I was denied the opportunity to be heard. It was not even submitted before the Court. The documents were rejected.

According to your web site, I must file 3 days in advance, and am alerting you now, three days wherein I seek an accommodation in the form of time by granting a stay of the proceeding to protect not only my liberty, but life too.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

(302) 493-6693

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

From: "administrator@pacourts.us" <administrator@pacourts.us>

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

Sent: Wednesday, December 21, 2022 at 11:28:53 AM EST

Subject: "Answer to Application for Emergency Relief" filing WSUPWD01363707 rejected for case "In the Matter of: Meghan Marie Kelly" (2913 DD3)

"Answer to Application for Emergency Relief" filing WSUPWD01363707 rejected for case "In the Matter of: Meghan Marie Kelly" (2913 DD3)

A filing has been rejected on a case in which you, or the attorney(s) you are proxying for, are participating.

Click the following link to login to PACFile and view this notification: <https://ujportal.pacourts.us/Secure/eFiling/ViewNotification.aspx?notificationID=122080620>.

This notification was sent on 12/21/2022 11:18 AM.

Appendix Z

APPENDIX 1-c

Showing missing
Document
for filing 21-5522
Kelly v. Trump

[Click to Print](#)

Printed on: 7/21/2021 13:29:40 GMT-0400 (Eastern Daylight Time)

Case History Search

Search Created:
 7/21/2021 13:29:40 GMT-0400 (Eastern Daylight Time)

Court: DE Supreme Court **Judge:** Delaware, Supreme Court **File & ServeXpress Live Date:** 4/21/2021
Division: N/A **Case Number:** 119,2021 **Document(s) Filed:** 53
Case Type: Civil-Other **Case Name:** Kelly, Meghan v. Donald Trump **Date Range:** All
Linked Case(s): 2020-0809-PWG [\[View Case History\]](#)

1-21 of 21 transactions <<Prev Page 1 of 1 Next>>

Transaction	Date/Time	Option	Case Number Case Name	Authorizer Organization	#	Document Type	Document Title	Size
66786294	7/21/2021 1:02 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	Letter	Letter dated 7-21-21 from Appellant to Court, regarding elimination of the dollar-intentionally crashing the economy to get out of the biggest bill failing due, caring for the baby boomers. (dja)	0.1MB	
					Exhibit	Exhibit to letter	2.1MB	
					Exhibit	Exhibit-Covid-19: The Great Reset	1.9MB	
					Exhibit	Exhibit part 1	4.1MB	
					Exhibit	Exhibit Part 2	9.9MB	
					Exhibit	Exhibit Part 3	7.3MB	
					Exhibit	Exhibit part 4	8.5MB	
					Exhibit	Exhibit part 5.	10.9MB	
66776781	7/19/2021 11:33 AM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	45	Mandate to Clerk of Court Below	Mandate to Clerk of Court below. Case closed. (raw)	0.3MB
66776197	7/19/2021 9:40 AM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Gary F Traynor, DE Supreme Court	44	Order	Order dated 7-19-21 by Traynor, J. IT IS ORDERED that the motion for reargument is DENIED. (JTV, GFT, TMR) (raw)	0.1MB
66764398	7/14/2021 8:59 AM EDT	File And Serve	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	43	Motion for Reargument	Appellant's Unopposed Motion for a Reargument Before the Delaware Supreme Court. (filed 7-12-21) (ead)	0.3MB
66744583	7/7/2021 9:11 AM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Gary F Traynor, DE Supreme Court	42	Order - Final	Order dated 7-7-21 by Traynor, J. IT IS ORDERED that the judgment of the Court of Chancery is AFFIRMED. The other pending motions are moot. (JTV, GFT, TMR) (ead)	0.1MB

Case No.	Date	Time	Action	Case No.	Party	Court	Doc No.	Description	File Name	Size					
66567019	6/8/2021	4:00 PM EDT	File Only	119,2021	Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	32	Opening Brief	Appellant's opening brief. (dja)	0.5MB					
							33	Other	Declaration filed by appellant.	0.1MB					
							34	Proposed Order	Proposed order.	0.1MB					
							35	Certificate of Compliance with Typeface	Certificate of Compliance with Typeface.	0.1MB					
							36	Exhibit	Court of Chancery docket. (dja)	0.2MB					
							37	Appendix	Appendix A-1	0.1MB					
							38	Appendix	Appendix A-2	0.1MB					
							39	Appendix	Appendix A-3. (dja)	0.2MB					
							40	Appendix	Appendix A-4. (dja)	1.2MB					
							41	Appendix	Appendix A-5. (dja)	1.3MB					
6659299	6/4/2021	4:08 PM EDT	File And Serve	119,2021	Kelly, Meghan v. Donald Trump	Gary F Traynor, DE Supreme Court	31	Order	Order dated 6-4-21 by Traynor, J. Supreme Court Rule 14(d)(1) provides that an opening brief shall not exceed 10,000 words. [sic] The motion states that the appellant's word count is 9,300 words. Using 14-point font in the footnotes, as required by Rule 13(a)(1), will not increase the word count. Thus, it appears that no relief is required. Moreover, the motion does not state the number of additional words requested. (raw)	0.2MB					
							• Linked to (1)								
							28	Motion under Rule 14(d)	Motion under Rule 14(d) by appellant. (dja)	0.2MB					
							29	Other	Appellant's declaration.	0.1MB					
6658984	6/4/2021	3:20 PM EDT	File Only	119,2021	Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	30	Proposed Order	Proposed Order of motion	0.1MB					
							• Linked from (1)								
							21	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(dja)	0.2MB					
							22	Exhibit	Exhibit 1	0.1MB					
66649842	6/2/2021	11:29 AM EDT	File Only	119,2021	Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	23	Exhibit	Exhibit 2	0.2MB					
							24	Exhibit	Exhibit 3	0.1MB					
							25	Exhibit	Exhibit 4	0.3MB					
							26	Other	Declaration by appellant.	0.1MB					
							27	Proposed Order	Proposed order to motion.	0.1MB					
							16	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully	0.2MB					
66639035	5/27/2021	2:52 PM EDT	File Only	119,2021	Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	16	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully	0.2MB					
							MISSING								

① missing

2 missing

③ Recusal MISSING

MISSING

(H)

④ Missi

pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-25-21) (556) (dja)

					17	Other	Signed Declaration filed by appellant. (dja)	0.1MB
					18	Exhibit	Exhibit 55 (dja)	0.6MB
					19	Exhibit	Exhibit DELAP document. (dja)	0.1MB
					20	Proposed Order	Proposed order.	0.1MB
66629407	5/25/2021 12:12 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	15	Letter from Supreme Court Clerk	Letter dated 5-25-21 from Clerk to appellant, striking the letter as a nonconforming filing. (ead)	0.1MB
66629090	5/25/2021 11:08 AM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	13	Letter	Letter dated 4-20-21, received 5-24-21, from appellant to justices, regarding her appeal. (ead)	0.1MB
					14	Exhibit	Exhibits to letter. (ead)	0.6MB
66625495	5/24/2021 12:35 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Paul A Fioravanti Jr, DE Court of Chancery Civil Action	12	Record as Ordered	Transfer of Court of Chancery docket to Supreme Court on appeal constituting the record as ordered. (dja) • Linked to (1)	0.2MB
66612254	5/18/2021 5:42 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	11	Letter - Record Due from Supreme Court Clerk	Letter dated 5-18-21 from Senior Court Clerk to the Chief Register in Chancery, advising the record is due 6-10-21. (raw) • Linked from (1)	0.1MB
66603779	5/14/2021 3:41 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	10	Brief Schedule	Brief schedule issued. (Opening Brief is due 6-28-21)(raw)	0.1MB
66601300	5/14/2021 8:56 AM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Gary F Traynor, DE Supreme Court	9	Order	Order dated 5-14-21 by Traynor, J., appellant's motion to proceed in forma pauperis is GRANTED, limited only to waiver of docketing fee. (ead)	0.1MB
66572383	5/5/2021 8:08 AM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	8	Certificate of Service	Certificate of service to statement in lieu. (served by mail and email on 5-4-21) (dja)	0.1MB
66570847	5/4/2021 3:07 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	7	Statement in lieu of ordering Transcript	Statement pursuant to Rule 9(e) in lieu of ordering of proceedings below by appellant. (dja)	0.1MB
66566457	5/3/2021	File Only	119,2021	Supreme	6	Other	Unsworn declaration filed	0.1MB

Case ID	Date	Time	Action	Case No	Party	Court	Document ID	Description	File Size
	1:32 PM EDT				Kelly, Meghan v. Donald Trump	Court Delaware, DE Supreme Court		by appellant. (dja)	
66540809	4/23/2021	10:26 AM EDT	File And Serve	119,2021	Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	5	Letter from Supreme Court Clerk Letter dated 4-21-21 from Clerk to appellant, directing that the IFP must be notarized or an unsworn declaration be filed by 5-5-21. Advising that the many documents filed with the notice of appeal will not be docketed. (ead)	0.1MB
66533768	4/21/2021	11:53 AM EDT	File Only	119,2021	Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	1	Notice of Appeal Pro Se Notice of appeal from the Order dated 3-26-21 in the Court of Chancery, by Vice Chancellor Fioravanti, in C.A. No. 2020-0809, with designation of no transcript. (no service shown) (dja) (filed on 4-20-21)	0.2MB
							2	Exhibit Exhibit-NOA order dated 3-26-21	0.3MB
							3	Exhibit Exhibit-NOA Master's Final Report dated 11-2-20. (dja)	0.1MB
							4	Motion to Proceed in Forma Pauperis Motion to proceed in forma pauperis by appellant. (not notarized)(dja) (filed on 4-20-21)	0.5MB

Appendix AA

RE: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

From: Jason Gonzales (jgonzales@fileandserve.com)
To: meghankellyesq@yahoo.com
Date: Thursday, October 13, 2022 at 06:00 PM EDT

My pleasure, Ms. Kelly.

Let me do some research on our side to see what information we can glean.

Thank you.

Jason

Jason Gonzales

Manager, Account Management, [File & ServeXpress](#)

972-893-6632 jgonzales@fileandserve.com



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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, October 12, 2022 5:41 PM
To: Jason Gonzales <jgonzales@fileandserve.com>
Cc: Support <support@fileandserve.com>; Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hi Jason,

Thank you so much. The court misbehaved by sealing and leaving documents unsealed to protect the court.

Are you able to provide dates documents were unsealed and sealed in both matters?

I have contacted the court. The court provided inaccurate information on the unsealing and sealing of documents in the two matter.

Thank you for the email indicating it is not file serve's fault or under your control.

Thank you,

Meg
Please forgive typos.
Sent from my iPhone

On Oct 12, 2022, at 4:52 PM, Jason Gonzales <jgonzales@fileandserve.com> wrote:

Good afternoon Ms. Kelly.

Our Support team forwarded your email to me. I can confirm that our platform is integrated with the Delaware Courts. Our system automatically updates when the court takes action on or changes the status of a case/filing/documents. File & ServeXpress does not assume the authority to seal and unseal documents.

I encourage you to contact the court should you have any questions about the security status of a case and/or a document(s).

Thank you.

Sincerely,
Jason

Jason Gonzales
Manager, Account Management, [File & ServeXpress](#)

<image011.png>

972-893-6632

[<image018.png>](#)

<image012.png>

jgonzales@fileandserve.com

[<image013.png>](#) [<image014.png>](#) [<image015.png>](#) [<image016.png>](#) [<image017.png>](#)

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From: Support <support@fileandserve.com>
Sent: Monday, October 10, 2022 1:19 PM
To: 'Meg Kelly' <meghankellyesq@yahoo.com>
Cc: Support <support@fileandserve.com>
Subject: RE: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hello Ms. Kelly!

I have reached out to our team to provide some clarify for your inquires below, and will follow up with you before the end of the day with additional information.

<image001.gif>

Client Support JR, [File & ServeXpress](#)

<image002.png>

[888-529-7587](tel:888-529-7587)

<image003.png>

[<image009.png>](#)

support@fileandserve.com

[<image004.png>](#) [<image005.png>](#) [<image006.png>](#) [<image007.png>](#) [<image008.png>](#)

<image010.jpg>

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, October 10, 2022 12:01 PM
To: Support <support@fileandserve.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Good morning,

Per the September 7, 2022 order in the first docket attached hereto, relating to Delaware Supreme Court matter IMO Meghan Kelly a member of the bar, the court ordered the case unsealed. Did the Court process the request on September 29, 2022, and did it go through on September 30, 2022?

In the second docket attached hereto, case number 119, 2021, Case name Meghan Kelly v Donald Trump, could you please provide the dates the following four documents were sealed and unsealed?

Transaction ID 66649842, docket item 21.

Transaction ID 66639035, docket item 16

Transaction item number 66667019, Docket Item 40, appendix A-4, Docket item 41 Appendix A-5.

Could you please confirm that Delaware Courts are an integrated courts. By integrated Courts I mean the courts are in charge of what is sealed and unsealed. File and serve does not assume the authority to seal and unseal documents by request. It is physically entered by the attorneys and courts.

I am a party in both cases.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

meghankellyesq@yahoo.com

Appendix BB

[1192021, Kelly, Meghan v. Donald Trump, et al](#)

DE Supreme - New Castle

New Castle

This case was retrieved on **11/04/2021**

Header

Case Number: 1192021
Date Filed: 04/21/2021
Date Full Case Retrieved: 11/04/2021
Status: Open
Misc: (0) Civil-Other; Civil

Summary

Judge: Delaware, Supreme Court
Status: Active

Participants

Litigants

Meghan Kelly
Appellant
 Donald J. Trump President
Appellee
 Donald Trump
Appellee
 Meghan Kelley
Appellee
 New Castle County, Sheriff
Appellee

Attorneys

Pro Se Pro Se
 Appellant

 Sheriff New Castle County
 Appellee
 Fax : 302-395-8460
 302-395-8457

President Donald Trump
Appellee
 President of the United States
Appellee
 DE Supreme Court
Other

Proceedings

Date	#	Proceeding Text	Details
04/21/2021	1	Notice of appeal from the Order dated 3-26-21 in the Court of Chancery, by Vice Chancellor Fioravanti, in C.A. No. 2020-0809, with designation of no transcript. (no service shown) (dja) (filed on 4-20-21)	Number of Pages: 8 Filer Name: Meghan Kelly
04/21/2021	2	Exhibit-NOA order dated 3-26-21	Number of Pages: 6 Filer Name:

1192021, Kelly, Meghan v. Donald Trump, et al

Date	#	Proceeding Text	Details
			Meaghan Kelly
04/21/2021	3	Exhibit-NOA Master's Final Report dated 11-2-20. (dja)	Number of Pages: 8 Filer Name: Meaghan Kelly
04/21/2021	4	Motion to proceed in forma pauperis by appellant. (not notarized)(dja) (filed on 4-20-21)	Number of Pages: 13 Filer Name: Meaghan Kelly
04/23/2021	5	Letter dated 4-21-21 from Clerk to appellant, directing that the IFP must be notarized or an unsworn declaration be filed by 5-5-21. Advising that the many documents filed with the notice of appeal will not be docketed. (ead)	Number of Pages: 3
05/03/2021	6	Unsworn declaration filed by appellant. (dja)	Number of Pages: 1
05/04/2021	7	Statement pursuant to Rule 9(e) in lieu of ordering of proceedings below. (dja)	Number of Pages: 2
05/05/2021	8	Certificate of service to statement in lieu. (served by mail and email on 5-4-21) (dja)	Number of Pages: 1
05/14/2021	9	Order dated 5-14-21 by Traynor, J., appellant's motion to proceed in forma pauperis is GRANTED, limited only to waiver of docketing fee. (ead)	Number of Pages: 1
05/14/2021	10	Brief schedule issued. (Opening Brief is due 6-28-21)(raw)	Number of Pages: 1
05/18/2021	11	Letter dated 5-18-21 from Senior Court Clerk to the Chief Register in Chancery, advising the record is due 6-10-21. (raw)	Number of Pages: 1
05/24/2021	12	Transfer of Court of Chancery docket to Supreme Court on appeal constituting the record as ordered. (dja)	Number of Pages: 7 Filer Name: Kruger, Katrina
05/25/2021	13	Letter dated 5-25-21 from Clerk to appellant, striking the letter as a nonconforming filing. (ead)	Number of Pages: 1
06/04/2021	14	Motion under Rule 14(d) by appellant. (dja)	Number of Pages: 8
06/04/2021	15	Appellant's declaration.	Number of Pages: 1
06/04/2021	16	Proposed Order of motion.	Number of Pages: 1
06/04/2021	17	Order dated 6-4-21 by Traynor, J. Supreme Court Rule 14(d)(i) provides that an opening brief shall not exceed 10,000 words. [sic] The motion states that the appellant's word count is 9,300 words. Using 14-point font in the footnotes, as required by Rule 13(a)(i), will not increase the word count. Thus, it appears that no relief is required. Moreover, the motion does not state the number of additional words requested. (raw)	Number of Pages: 2

1192021, Kelly, Meghan v. Donald Trump, et al

Date	#	Proceeding Text	Details
06/08/2021	18	Appellant's opening brief. (dja)	Number of Pages: 53
06/08/2021	19	Declaration filed by appellant.	Number of Pages: 1
06/08/2021	20	Proposed order.	Number of Pages: 2
06/08/2021	21	Certificate of Compliance with Typeface.	Number of Pages: 1
06/08/2021	22	Court of Chancery docket. (dja)	Number of Pages: 11
06/08/2021	23	Appendix A-1	Number of Pages: 2
06/08/2021	24	Appendix A-2	Number of Pages: 2
06/08/2021	25	Appendix A-3. (dja)	Number of Pages: 8
06/08/2021	26	Appendix A-4. (dja)	Number of Pages: 38
06/08/2021	27	Appendix A-5. (dja)	Number of Pages: 34
07/07/2021	28	Order dated 7-7-21 by Traynor, J. IT IS ORDERED that the judgment of the Court of Chancery is AFFIRMED. The other pending motions are moot. (JTV, GFT, TMR). (EAF)	Number of Pages: 7
07/14/2021	29	Appellant's Unopposed Motion for a Reargument Before the Delaware Supreme Court. (filed 7-12-21) (ead)	Number of Pages: 16
07/19/2021	30	Order dated 7-19-21 by Traynor, J. IT IS ORDERED that the motion for reargument is DENIED. (JTV, GFT, TMR) (raw)	Number of Pages: 1
07/19/2021	31	Mandate to Clerk of Court below. Case closed. (raw)	Number of Pages: 11
07/21/2021	32	Letter dated 7-21-21 from Appellant to Court, regarding elimination of the dollar-intentionally crashing the economy to get out of the biggest bill falling due, caring for the baby boomers. (dja)	Number of Pages: 2
07/21/2021	33	Exhibit to letter	Number of Pages: 8
07/21/2021	34	Exhibit-Covid-19: The Great Reset.	Number of Pages: 213
07/21/2021	35	Exhibit part 1	Number of Pages: 58
07/21/2021	36	Exhibit Part 2	Number of Pages: 34
07/21/2021	37	Exhibit Part 3	Number of Pages: 35
07/21/2021	38	Exhibit part 4	Number of Pages: 34
07/21/2021	39	Exhibit part 5.	Number of Pages: 33
07/22/2021	40	Letter dated 7-22-21 from Chief Deputy Clerk to appellant, advising her case is closed and the Court will take no further action with her	Number of Pages: 1

1192021, Kelly, Meghan v. Donald Trump, et al

Date	#	Proceeding Text	Details
09/01/2021	41	letter. In addition, the Court will not docket or act on any future documents submitted in this matter. (dja)	
11/03/2021	42	Letter dated 8-30-21 from U.S. Supreme Court Clerk to Clerk, advising that the writ of certiorari was filed on 8-23-21 and placed on the docket 8-30-21 as No. 21-5522. (eaf)	Number of Pages: 1
11/03/2021	42	Letter dated 11-1-21 from Supreme Court of the United States to Clerk of Supreme Court of Delaware, advising that the petition for a writ of certiorari is denied.	Number of Pages: 1

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End of Document

Appendix CC

CASE 1:19-2021

Transaction ID 66648942, docket item 21.

Submit Date	Reviewer	Reviewer Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:21AM EDT	28, Supreme Court	Accepted (6/7/2021)	28, Supreme Court	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(jls)	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(jls)	Public	\$0.00
Jun 3 2021 8:36AM EDT	28, Supreme Court	Accepted (6/7/2021)	28, Supreme Court	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(jls)	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(jls)	Sealed, electronic	\$0.00
Jun 2 2021 11:55AM EDT	28, Supreme Court	Accepted (6/7/2021)	28, Supreme Court	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dl)	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dl)	Sealed, electronic	\$0.00
Jun 2 2021 11:29AM EDT	Pending	Pending		Motion - Other	Document created	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dl)	Sealed, electronic	\$0.00

Transaction ID 66670205, docket item 16

Submit Date	Reviewer	Reviewer Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:20AM EDT	28, Supreme Court	Accepted (5/27/2021)	28, Supreme Court	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-15-21) (556) (jls)	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-15-21) (556) (jls)	Public	\$0.00
May 27 2021 3:08PM EDT	28, Supreme Court	Accepted (5/27/2021)	28, Supreme Court	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-15-21) (556) (jls)	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-15-21) (556) (jls)	Sealed, electronic	\$0.00
May 27 2021 2:52PM EDT	Pending	Pending		Motion - Other	Document created	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-15-21) (556) (jls)	Sealed, electronic	\$0.00

Transaction item number 66667020, docket item 40, appendix A-4, docket item 41, Appendix A-5.

Submit Date	Reviewer	Reviewer Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:22AM EDT	28, Supreme Court	Accepted (6/8/2021)	28, Supreme Court	Appendix	Appendix A-4 (jls)	Appendix	Appendix A-4 (jls)	Public	\$0.00
Jun 8 2021 4:10PM EDT	28, Supreme Court	Accepted (6/8/2021)	28, Supreme Court	Appendix	Appendix A-4 (jls)	Appendix	Appendix A-4 (jls)	Sealed, electronic	\$0.00
Jun 8 2021 4:00PM EDT	Pending	Pending		Appendix	Document created	Appendix	Appendix A-4 (jls)	Sealed, electronic	\$0.00
May 17 2022 8:22AM EDT	28, Supreme Court	Accepted (6/8/2021)	28, Supreme Court	Appendix	Appendix A-5 (jls)	Appendix	Appendix A-5 (jls)	Public	\$0.00
Jun 8 2021 4:10PM EDT	28, Supreme Court	Accepted (6/8/2021)	28, Supreme Court	Appendix	Appendix A-5 (jls)	Appendix	Appendix A-5 (jls)	Sealed, electronic	\$0.00
Jun 8 2021 4:00PM EDT	Pending	Pending		Appendix	Document created	Appendix	Appendix A-5 (jls)	Sealed, electronic	\$0.00

Appendix DD

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of Court

Pennsylvania Supreme Court

Pennsylvania Judicial Center

601 Commonwealth Ave.

Suite 4500

P.O. Box 62575

Harrisburg, PA 17106

RE: Retired PA Bar No. 202268/Computer broke

December 12, 2022

Dear Honorable Clerk of Court :

On December 12, 2022, the cord to my computer broke. I am unable to resolve this problem immediately.

I may be without a computer. This affects my ability to timely receive notifications and draft and file documents. It also prevents me from working on my response to this Court's November 8, 2022 Order.

I emailed opposing counsel concerning my ^{broken} computer, printer ^{mic} and concerning ^{Internet connectivity issues m.k.} the fact I do not feel well due to lack of time required to care for my health due to this litigation. I require time due to a surgery I had as a youth I previously noted to this Court on the record. ^{mll}

The 14 day extension is not enough time in light of my situation.

Thank you.

12/12/22

Respectfully Submitted,

Meghan Kelly

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

302-493-6693

Retired Bar 202268

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

Dated: December 12, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

Allstate Protection Plans: Response to your inquiry

From: Warranty Support (warrantysupport@squaretrade.com)

To: meghankellyesq@yahoo.com

Date: Monday, December 12, 2022 at 02:36 PM EST



Serviced by
SquareTrade, an
Allstate company

Dear Meghan,

Kindly send us the picture of your cord.

Thank you,
The Allstate Protection Plans Team

If you have any questions or concerns, please feel free to visit our [help center](#).

ref:_00D306mMq._5005Y2JOAWw:ref

2913 dd3 Fw: Cord

From: Meg Kelly (meghankellyesq@yahoo.com)
To: anthony.sodroski@pacourts.us
Cc: meghankellyesq@yahoo.com
Date: Monday, December 12, 2022 at 02:53 PM EST

Anthony,

I got home from the law library and my computer's charger is broke. You are aware that my printer is getting repaired.

I require a stay or a continuation. Denial will prejudice my ability to effectively defend my case.

I am not having the best of luck.

Please state whether your position remains the same.

You are also aware that I require time to rest and drink water per my previous filing with the court. I assert my right to live, as well as my liberty.

I have religious objections to healthcare and mental healthcare.


Regards,
Meg

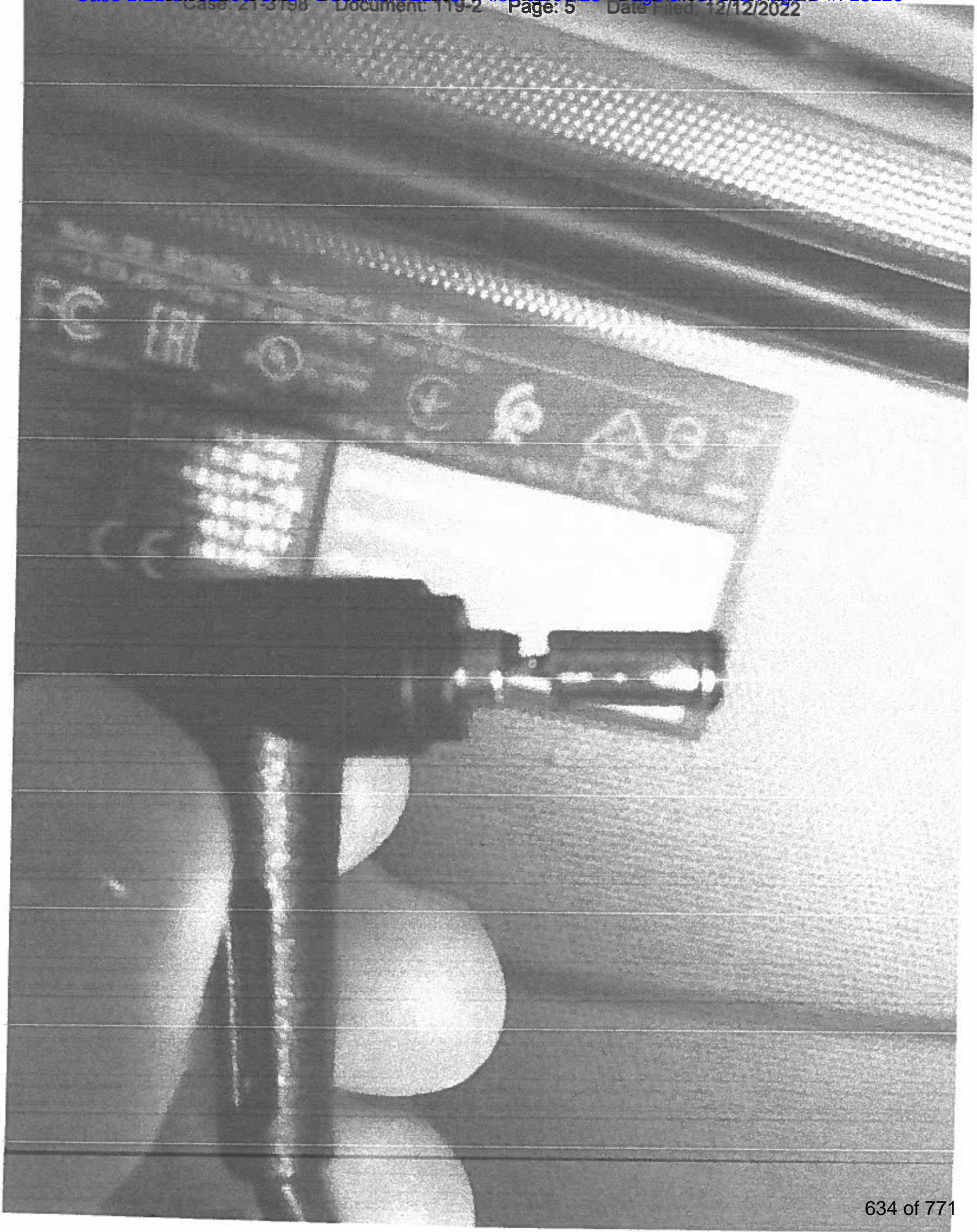
----- Forwarded Message -----

From: Meg Kelly <meghankellyesq@yahoo.com>
To: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, December 12, 2022 at 02:31:38 PM EST
Subject: Cord

Sent from my iPhone

 IMG_1717.jpg
834.2kB

 IMG_1716.jpg
702.4kB





Model / 型號: BR1160CK Notebook PC / 筆記型電腦

Input / 輸入: +19V == 2.37A 45W / +15V == 3A 45W (Only for Type C DC in)



ALL OTHER COMPANIES ORZ ALL OTHER COMPANIES CAN ICES-003 (3) / NMB-003(B) Made in China / 中國製造 R-1

Contents

- 1. Power Adapter (AC20V 4.5A)
- 2. Power Adapter (AC19V 2.37A)
- 3. Power Adapter (AC15V 3A)
- 4. Power Adapter (AC12V 4.5A)
- 5. Power Adapter (AC9V 5A)
- 6. Power Adapter (AC5V 2A)
- 7. Power Adapter (AC3V 3A)
- 8. Power Adapter (AC1.5V 5A)
- 9. Power Adapter (AC0.5V 10A)
- 10. Power Adapter (AC0.2V 20A)



電圧値に依り5.2/5.3GHz帯域内使用に限ります (5.2GHz帯域出力が一部適用) 電力消費を減らす (5.2GHz帯域出力が一部適用) 電力消費を減らす (5.2GHz帯域出力が一部適用)

BR1160CKA-X504

SN: MSNXL P00X314207

CN: N9DY

MFD: 2021-05

1.2M

2913 dd 3 Fw: ASUS Service No=N2209023925-0005; Rma No=

From: Meg Kelly (meghankellyesq@yahoo.com)
To: anthony.sodroski@pacourts.us
Cc: meghankellyesq@yahoo.com
Date: Monday, December 12, 2022 at 03:13 PM EST

Anthony,

I am on the phone. They rejected my request for a new cord relating to physical damage. It is faulty, and I am seeking to talk to a manager relating to this design defect.

I require time. I am prejudiced and do not have adequate time to file a response in light of my circumstances.

Please reconsider your position.

Thank you,
Meg

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

From: ServiceCenter_AM <servicecenter_am@asus.com>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Monday, December 12, 2022 at 03:09:38 PM EST
Subject: ASUS Service No=N2209023925-0005; Rma No=

Hello Meghan Kelly,

Thank you for contacting ASUS Product Support.

My name is Daniel Mo. and it's my pleasure to help you with your problem.

CASE NO= N2209023925-0005

You are more than welcome to visit our Asus support website: <https://www.asus.com/us/support>
If you continue to experience issues in the future, please do not hesitate to contact us.

Best regards,
Daniel Mo.
ASUS Product Support
Chat with Us if you need further support.

Help make us better! Let us know what we can do to improve by clicking [here](#).



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This email and any attachments to it contain confidential information and are intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient or receive it accidentally, please immediately notify the sender by e-mail and delete the message and any attachments from your computer system, and destroy all hard copies. If any, please be advised that any unauthorized disclosure, copying, distribution or any action taken or omitted in reliance on this, is illegal and prohibited. Furthermore, any views or opinions expressed are solely those of the author and do not represent those of ASUSTeK. Thank you for your cooperation.
=====
=====

Internet problems/Computer and printer problems too

From: Meg Kelly (meghankellyesq@yahoo.com)
To: anthony.sodroski@pacourts.us
Cc: meghankellyesq@yahoo.com
Date: Monday, December 12, 2022 at 03:22 PM EST

Anthony,

I also have been having problems with the internet for more than a week. I went into mediacom to seek to resolve the problem today.

They printed out the note on the file noting they see problems. Attached, please find the print out.

I am still on the phone hoping to get my computer fixed despite the initial denial.

I need to conserve the battery as i try to figure out how to best use the remaining life I have.

My apologies should I not respond to emails. Please afford me meaningful opportunity to respond. On a side note, the representative relating to Asus, the computer people just hung up on as I am on hold. I must call again.

Thank you,
Meg

 scan.pdf
6.5kB

204017976160221209 mediacomcorp\gbaldelli signal issues showing on modem may need a tech - will possible swap modem at LO - informed that may not work but will see. If issue persists will work out a tech visit - please give printout of this note for record of issue.

2913 dd 3 printer Fw: Return Instructions for your Epson product - 221207-004892

From: Meg Kelly (meghankellyesq@yahoo.com)
To: anthony.sodroski@pacourts.us
Cc: meghankellyesq@yahoo.com
Date: Thursday, December 8, 2022 at 09:02 AM EST

Good morning,

Yesterday, my printer broke and I shipped it off, and a back up one is not working.

I am giving you notice in case I need to file past today's deadline.

I am not misleading you. Inconveniences sometimes happen. The rich may buy help. The poor are without help and without the ability to buy solutions only the rich may afford, preventing justice in many cases beyond my own. Throwing money at it is not the answer. Accommodations are. not exploiting need to serve greed under the guise of charity in violation of Jesus's teachings in Matthew 6:1-4.

Have grace.

Thank you,
Meg

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

From: Epson America Inc. <autonotification@ea.epson.com>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Wednesday, December 7, 2022 at 06:18:03 PM EST
Subject: Return Instructions for your Epson product - 221207-004892

Dear Customer,

Please follow the instructions below to package and return your original unit.

For your reference:

Serial Number: X8GN117798
Model: ECOTANK ET-4800 WHITE AIO PRINTER WIFI
Reference Number: 221207-004892
RMA Number: 0050993142

Package your product

Click this link for packaging instructions: [Packaging Instructions](#)

Print your return shipping label

Epson provides a return shipping label for your convenience. After you package the product, print your label using one of these options:

Note: After you print your return shipping label, it is available to reprint for 5 days at [fedex.com](https://www.fedex.com)

- Print the label yourself

Click this link to view the label: [Print Label](#)

- Print the label at a FedEx location

The barcode attachment should only be scanned from your mobile device, do not print it out. Bring your mobile device to a FedEx location [FedEx location](#) and show them this email and they can print the label by scanning the attached barcode file from your mobile device. Check with the FedEx location to be sure the "Get a Shipping Label" service is available.

Return your product

Take your package(s) to the nearest [FedEx location](#) for return shipping.

Best Regards,

Epson Support Team

This email was sent from a notification-only address that cannot accept incoming email. Please do not reply to this message.



2913 dd3 Second Motion for a stay stance

From: Meg Kelly (meghankellyesq@yahoo.com)
To: anthony.sodroski@pacourts.us; meghankellyesq@yahoo.com
Date: Friday, December 9, 2022 at 07:59 AM EST

Good morning,

I have slept all night, and am not feeling too well.

What is your stance if i draft a Second Motion for a stay. It appears that is the appropriate thing to do. I need to remove any allegations of court error and include the new and additional facts.

Reargument appears to be the wrong relief. I have new facts and conditions which are not included in the 4 items below.

"Rule 2543. Considerations Governing Allowance of Reargument

Currentness

Reargument before an appellate court is not a matter of right, but of sound judicial discretion, and reargument will be allowed only when there are compelling reasons therefor. An application for reargument is not permitted from a final order of an intermediate appellate court under: (1) the Pennsylvania Election Code; or (2) the Local Government Unit Debt Act or any similar statute relating to the authorization of public debt.

Note: The following, while neither controlling nor fully measuring the discretion of the court, indicate the character of the reasons which will be considered:

- (1) Where the decision is by a panel of the court and it appears that the decision may be inconsistent with a decision of a different panel of the same court on the same subject.
- (2) Where the court has overlooked or misapprehended a fact of record material to the outcome of the case.
- (3) Where the court has overlooked or misapprehended (as by misquotation of text or misstatement of result) a controlling or directly relevant authority.
- (4) Where a controlling or directly relevant authority relied upon by the court has been expressly reversed, modified, overruled or otherwise materially affected during the pendency of the matter sub judice, and no notice thereof was given to the court pursuant to Rule 2501 (b) (change in status of authorities).

The 1997 amendment clarifies that applications for reargument are not to be filed in matters arising under the Pennsylvania Election Code, the Act of June 3, 1937, P.L. 1333, 25 P.S. §§ 2600-3591, or the Local Government Unit Debt Act, 53 Pa.C.S. §§ 8001-8271. Matters involving elections and authorization of public debt require expeditious treatment. See, e.g., Rule 1113(c)."

Reconsideration does not appear to be the correct relief to ask regarding new facts in the appellate Court as opposed to a trial court.

The Rules related to reconsideration above do not include new and additional facts.

Plus, I discovered the information more than 7 days after the order.

"Pa.R.A.P. Rule 3814. | Reconsideration. A petition for reconsideration of the Supreme Court's Order may be filed within seven days of the date of the Court's Order."

The other rules appear to apply with the denial of an appeal. See, Rule 1123. | Denial of Appeal; Reconsideration. (a) Denial

I do not see any other way to introduce the need to answer new questions and time to include additional evidence found without fault. I was not sitting on this.

Thank you.

Meg

Not acting as an attorney

I am scrolling from a PDF of the rules the law librarian sent me. Please excuse the lack of citations.

2913 dd3 What is your stance on a continuance

From: Meg Kelly (meghankellyesq@yahoo.com)
To: anthony.sodroski@pacourts.us
Cc: meghankellyesq@yahoo.com
Date: Friday, December 9, 2022 at 02:40 PM EST

Hi Anthony,

Could you please let me know your stance on a continuance. I do not have time to do all things, and should not be compelled to waive my rights out of necessity.

I am trying to figure out how not to prevent additional punishment for my religious beliefs in God as guide not money. I believe people are misled to loss of eternal life by seeking money in business or organised charity as savoir, as God, should they not repent. See Matthew 6:1-4 and John 2:16

My beliefs are not fake. I do not want to be compelled to violate my beliefs. I do not want to sell my soul to hell in exchange. :(My faith in Jesus and my ability to practice law are important to me. Just because i believe differently than the majority of Christians is not evidence of a disability.

Thank you,
Meg

It looks in another board nonattorney hearing continuances are allowed.

After discussing further with the prosecuting attorney the effect any pending federal litigation should have on the proceedings, the Hearing Examiner indicated that she would grant Mir another continuance of six to eight weeks and would advise Mir that this would be the last continuance in the case. (R.R. 628.)

Mir v. Bureau of Pro. & Occupational Affs., No. 2557 C.D. 2015, 2016 WL 6407477, at *3 (Pa. Commw. Ct. Oct. 31, 2016)

Appendix EE

EXHIBIT 43

Documents regarding improving healthcare while spending less money, to prevent taking advantage of the sick by killing or concealing illness to serve business greed. More money is the problem not the solution. Just decrees, and justice in the courts are the solution.

1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District
2. Document, "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal
3. Meghan Kelly's teaching certificate, credibility
4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law

5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

- a. History of Western Medicine
- b. Economics
- c. Medieval Philosophy
- d. Psychology courses

6. Evidence of the surgery that inspired me to study healthcare issues.

Due to the surgery referred to therein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight every month. This is still a challenge. I must assert my right to live because many people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. "I am not my own." Other people are loved by God too.

Coastal Point

Guest Column

July 20, 2018

Representative candidate says health is wealth

By Meghan Kelly, Esq.
Candidate, Delaware House
of Representatives, 38th District

My name is Meghan Kelly, Esq. I am a candidate for the House of Representatives in the Nov. 6 race in the 38th District. I am running, in part, because I have a desire to draft laws to create better health care for Delawareans, and I want to persuade the federal legislators to draft specific legislation to reduce the price of care instead of eliminating care to those who need it most by rendering it unaffordable.

I am uniquely qualified to propose solutions in this area as an attorney who studied the history of medicine at University of Delaware, and health care finance and health care law at Duquesne School of Law School. I even received a small scholarship for healthcare law.

So, I thank you for your kind consideration, as I truly care about serving the people in the community I grew up in, and love and protecting their life and health.

This week, I will write about improving health care concerning the state of Delaware. Next week, I will submit a suggestion to our federal legislators regarding making health care more affordable. Instead of reducing the

amount of care, I respectfully urge our federal legislators to reduce the price of care. Only they have the power to do so, I will not.

In Delaware, I specifically want to draft legislation to improve the quality of health care, instead of merely getting massive bad care. Funding is more easily received when health care entities and professionals are researching cutting-edge techniques, which is dangerous for patients since they are still working out the kinks.

Think of the National Institute of the Health (NIH), charities who accept funding from the army and NIH, and private research or health care entities who make money on analysis. So they can use patient's records to sell alleged health care miracles in bulk, based on data. Part of the HIPPA waiver we sign at each doctor's visit allows our information to be used in this scientific research. So, patients may be lawfully used as lab rats.

I want to draft legislation to prevent the abuses we have seen by doctors like Dr. Earl Bradley, who allegedly molested hundreds of children; repeal the involuntary sterilization statute; and make it easier to prevent doctor and health care abuse of patients for a buck...

I want to prevent doctors from prescribing addictive drugs under the facade of benefiting the patient, but in truth to benefit their own pockets, to keep patients coming back for prescriptions for their addiction, not for good health.

I want to stop doctors like the local Delaware doctor who used cutting-edge treatments, hip replacements, on people, including my father. He said everything was fine for years, despite readily available information to the contrary, to cover his own back, instead of serving the patients like my father, the legendary retired teacher, lifeguard and coach Pat Kelly of Indian River High School.

No care is better than bad care. Thus, I desire to create legislation to ensure our health care providers are taking care of the patients, not taking advantage of the patients for profit. Our laws serve money — not people, not patients.

I want to create laws that penalize health care professionals for drugging the elderly at the elderly homes to make them easier to tend, like vegetables. We need to value and respect our elderly, (not keep them in an institution for our convenience). These institutions should

See KELLY page A15

Kelly

Continued from page A14

be developed to serve and respect the elderly, not take advantage of them for a profit.

Now is the time to value human life and health more than money. Now is the time to hold health care professionals accountable for their bad choices to harm instead of heal patients.

I desire to repeal the involuntary sterilization statute in Delaware under Title 16, Chapter 57 of the Delaware Code. There is too much incentive to sterilize people to use their stem cells for profit and research, instead of a needed need. Besides, the fact is sterilization is barbaric and arguably violates Delawareans' right to life, liberty and pursuit of happiness, despite the United States Supreme Court decision in Buck v. Bell, 274 US 200 (1927).

I desire to amend the medical mal-

practice act. It is very difficult to correct doctors under this act. In Delaware, a patient has two years from the date of the medical provider's misconduct, if a patient is younger than 6, until the patient's sixth birthday. The time may be extended in limited circumstances — for instance, if a doctor left a foreign object in a patient's body.

In addition to the short statute of limitations, in Delaware, you also need to get another health care professional to give an expert opinion concerning the malpractice of the medical provider. This is very tough to get because doctors do not want to give an opinion against a peer when they know they are capable of mistakes or a sloppy job, too.

The requirements of the expert opinion are also hard to meet. So, a lot of lawsuits are kicked out for failure to adhere to the requirements. For instance, if an expert says the doctor's act was a substantial factor in causing the harm, the opinion will get kicked out. In

Delaware, the expert must state the "but for" the doctor's conduct the harm would not have occurred.

Overall, if a doctor messes up on you, you most likely will be out of luck. The longer you wait to pursue legal relief, the tougher it will be for the attorney to find an expert required to have a case.

It is important to correct doctors, as the treatment they provide may harm other people for life or kill them. Since it's so difficult to sue, it's hard to prevent further harm by showing how certain treatments make people worse off. That's why we must amend the medical malpractice act in Delaware. We must prevent further patient harm and deaths.

By electing me you will be electing a candidate that will fight for your life and health. You are priceless — more valuable than all the money in the world. By electing me, you will be electing someone who serves people, not greed.

**Your Health is Your Wealth
You are Priceless. Not a price Tag!**

Kelly seeks Federal Consideration of Health Care Proposal

My name is Meghan Kelly. I am an attorney running in the November 6, 2018 race for the House of Representatives seat in the 38th District, which includes Bethany Beach, Fenwick, Millville, Frankford, Ocean View, Selbyville and parts of Dagsboro.

I am running, in part, because I discovered I had a deep passion to change the laws to better serve people. I have had the opportunity to review proposed laws for more than ten years, starting at Richards, Layton and Finger, PA. I have proposed comments on legislation to other attorneys in different bar sections, such as Corporate Law, E-Discovery, Personal and Real Property. Each section votes by majority. Unfortunately, I always get voted out since I tend to seek what serves Delawareans better, instead of what is convenient and profitable to our own practice. So, I continued to look at alternative ways to improve the laws.

I made calls to legislators, met with people, sent emails and letters in an attempt to amend the laws. Unfortunately, I was not successful. Yet, every time I observed corruption, abuse or misuse of power, my desire to improve the laws grew stronger. So, I found myself paying the filing fee to run for office. So, here I am.

I am running for a state legislative position. Nevertheless, the point of this letter is to discuss a suggestion relating to affordable health care that I submitted to our federal legislators and President Trump's Delaware liaison, Councilman Rob Arlett, in an attempt to gain their kind consideration at the federal level. Only the federal legislators will be able to address this issue, I will not. I am printing parts of some emails I sent to Rob Arlett in hopes the federal officials will reduce the price of health care instead of eliminating care to those who need it the most by rendering it unaffordable.

"...President Trump's initial idea was brilliant. Focus on reducing the cost of care instead of indirectly eliminating care, due to the astronomical cost. I understand your concern about appealing to emotion, but I believe people will die if they cannot afford care, just like many did prior to 1986.

Prior to 1986, Emergency Rooms ("ERs"), were turning away pregnant ladies and people in need of immediate care, due to their lack of insurance and inability to pay. Babies had complications, lots of pregnant moms died. It created public outrage.

So, Congress enacted Emergency Medical Treatment & Labor Act (EMTALA) in 1986, by using its power under Article 1 Section 8 of the Constitution, (the spending power), to require all hospitals with Emergency Rooms accept all patients regardless of their lack of insurance and inability to pay. Congress attached strings to such entities, by requiring the ERs accept all patients if they receive any Medicare or Medicaid, or be penalized financially.

Similarly, Congress can create price ceilings for drugs or health care for any entity receiving Medicare and Medicaid. This will extend to uninsured people as well.

The National Institute of the Health (NIH), is another vehicle the federal government may use to

implement President Trump's initial plan. This entity provides grants and subsidies for drug research. The Federal Government through basic contract law may condition the acceptance of such money upon the drug company's agreement to price ceilings. Should the drug company not honor such ceiling, they may draft a provision requiring the company to pay all such money back in addition to a penalty." (citation to email omitted). Medical providers may still choose to reduce the price of care to stay competitive. The price ceilings prevent entities from rendering people worthless or too expensive to care for.

"Instead of indirectly taking away care from people who cannot afford it, let's make it more affordable for people. So, like you said, Americans can assume more responsibility and autonomy in their own care.

Artificial entities without hearts care more about the bottom line than those they serve, unless caring will affect the bottom line. Congress has the ability to affect the bottom line to reduce the cost of healthcare instead of eliminating care indirectly by making it unaffordable.

Healthcare is an inelastic good, a necessity, meaning no matter how rich or poor you are, you would probably give all you had, including your home, to pay for care to save the life of your child, a loved one, or even your own life. The demand does not change with price. This is an exception to normal market theories of supply and demand dictating prices. Artificial entities will get as much money as they can, at the expense of lives.

The board members are far removed from those they serve. They most likely are thinking about how they can afford to pay for their kid's schooling instead of the individuals they serve. Since they are focused on the bottom line," please use your power federal legislators to affect the bottom. (citations to email omitted). Only you have the power to do so, I will not.

The federal legislators have Medicare, Medicaid, NIH and other mechanisms of federal funding to use as bargaining chips. They should use the bargaining chips to reduce the price of healthcare (and improve care), instead of threatening to reduce Medicare, Medicaid, or take those chips away. What will they have left to bargain with if they take everything away.

Thank you for your kind consideration.

Official Verification of Licensure Available at <https://de-da.doc.k12.de.us>

Issue Date: September 25, 2006
Effective Date:
Expiration Date:

State of Delaware

Department of Education

Initial License

Know all persons by these Present, that

Meghan Marie Kelly, Esq.

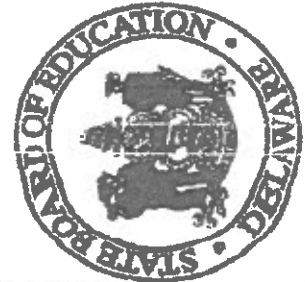
has fulfilled the Licensure and Certification requirements of the Professional Standards Board and is certified in the following area(s):

- STANDARD: Teacher of Elementary Grades K-6 **
- STANDARD: Teacher of Exceptional Children Grades K-12
- STANDARD: Teacher of Health Education Grades 5-12
- STANDARD: Teacher of Middle Level Mathematics Grades 6-8 **
- STANDARD: Teacher of Physical Education Grades K-12
- STANDARD: Teacher of Social Studies Grades 9-12 (Valid 5-8 in a Middle School)

This is a valid license. This license will be activated upon employment with a Delaware Public School District/Charter School.

** Indicates Highly Qualified in content areas covered by this certificate

Each License Holder is Responsible for Knowing and Satisfying License Renewal Requirements or Any Previous Requirements in Electronic File or Her License/Certificate



[Handwritten Signature]
Secretary of Education

LAW Transcript

DUQUESNE UNIVERSITY

601 FORBES AVENUE PITTSBURGH, PA 15282-0299

Record as of: 11/01/05

MS. MEGHAN M. KELLY

DEGREE: JURIS DOCTOR

MAJOR: Juris Doctor - Day

MINOR:

Student ID:

SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS
00	LEGAL PROCESS AND PRACTICE I	LAW	C756		1.00	2.00	7.5000
00	SEMESTER GPA = 3.5000	CUMULATIVE GPA =		2.50	1.00	2.00	7.5000
	CONTRACTS	LAW	C713		0.00	0.00	15.0000
	PROPERTY	LAW	C711		0.00	0.00	10.5000
	TORTS	LAW	C710		0.00	0.00	10.0000
	CIVIL PROCEDURE I	LAW	C705		1.00	2.00	9.7500
	CRIMINAL LAW & PROCEDURE	LAW	C67		1.00	2.00	11.2500
	LEGAL RESEARCH AND WRITING	LAW	C720		1.00	2.00	11.2500
00	SEMESTER GPA = 3.1167	CUMULATIVE GPA =		3.1667	7.00	20.00	87.5000
	NEW CASES WORKSHOP CRIM CONV	LAW	C701		1.00	2.00	7.5000
01	SEMESTER GPA = 3.7500	CUMULATIVE GPA =		3.7061	10	20.00	7.5000
	LABOR LAW	LAW	C7N			3.00	9.0000
	HEALTH CARE FINANCE	LAW	C704			3.00	7.5000
	EVIDENCE SECT B	LAW	C732			3.00	10.5000
02	SEMESTER GPA = 3.3750	CUMULATIVE GPA =		3.5581		6.00	27.0000
	LEGAL AND MEDICINE	LAW	C742			2.00	7.0000
	CONSTITUTIONAL LAW SECT B	LAW	C702			2.00	15.0000
	TAXATION	LAW	C710			2.00	17.0000
	CORPORATIONS SECT B	LAW	C736			2.00	13.0000
	FAMILY LAW	LAW	C76			2.00	7.0000
03	SEMESTER GPA = 3.1111	CUMULATIVE GPA =		3.4422		10	33.0000
	TRIAL COURT CLERKSHIP	LAW	C741			2.00	6.0000
04	SEMESTER GPA = 3.0000	CUMULATIVE GPA =		3.3077		10	33.0000
	PROFESSIONAL RESPONSIBILITY	LAW	C7N			1.00	6.0000
	ESTATES AND TRUSTS	LAW	C420			1.00	9.7500
	LEGAL ADVOCACY	LAW	C71			1.00	10.5000

SEM	COURSE DESCRIPTION	DEPT	CAT	T	COMPL	G.PTS	
	COMMERCIAL TRANSACTIONS I	LAW	C406	00	3.00	9.2500	
	APPELLATE PRACTICE & PROC	LAW	C434	00	0.50	0.0000	
04	SEMESTER GPA = 3.1667	CUMULATIVE GPA =		3.175	00	12.00	28.5000
	CONFLICTS OF LAW	LAW	C72	00	3.00	10.5000	
	BANKRUPTCY	LAW	C45	00	2.00	7.0000	
	FED COURTS & THE FED SYS	LAW	C703	00	2.00	9.7500	
	ROMAN LAW	LAW	C704	00	2.00	7.5000	
	COMMERCIAL TRANSACTIONS II	LAW	C407	00	3.00	9.7500	
05	SEMESTER GPA = 3.4231	CUMULATIVE GPA =		3.248	01	12.00	55.2500

TOTALS CRED CPT = 84.00

JURIS DOCTOR Degree awarded on 06/05

Major: _____ Minors: _____ Specializations: _____

Law's Doctor - Day

RAISED SEAL NOT REQUIRED

The official University transcript is printed on Secured paper and does not require a raised seal

Patricia E. Jakub
 Patricia E. Jakub
 University Registrar

ISSUED TO STUDENT

MEGHAN M. KELLY

NAME: Meghan Marie Kelly

SEX: FEMALE

DATE OF BIRTH: 08/11/02

ACADEMIC YEAR: 2

FRANCISCRIP LEGEND

Current Academic Program:
 College of Arts and Science
 Bachelor of Arts
 Major: History Education

Transferred to:
 College of Arts and Science
 Bachelor of Arts
 Major: History Education

UNIVERSITY OF DELAWARE Progress Confirmed:
 Bachelor of Arts and Science
 Major: History
 Rank: 1213 of 3174 in class, 18 of 73 in History
 Graduation GPA: 3.350

UNIVERSITY OF DELAWARE Progress Confirmed:
 Bachelor of Arts and Science
 Major: History
 Rank: 1213 of 3174 in class, 18 of 73 in History
 Graduation GPA: 3.350

Completed NCATE/State Approved Teacher Education Program in Social Studies Education
 University of Delaware
 Confirmed May 2002

Completed NCATE/State Approved Teacher Education Program in Social Studies Education
 University of Delaware
 Confirmed May 2002

Admitted Program:
 College of Education
 Bachelor of Science in Education
 Major: Elementary Teacher Education

Admitted Program:
 College of Education
 Bachelor of Science in Education
 Major: Elementary Teacher Education

EDST-247	PROF. ISSUES: HIST PERSPECTIV'S	3	10,000
ENGL-110	CRITICAL READING & WRITING	(3)	7,000
HPER-120	EXERCISE AND CONDITIONING	1	4,000
MATH-251	MATH FOR ELEMENTARY SCHOOL I	3	11,000
POSC-240	INTRO TO INTERNATIONAL RELATIONS	3	6,000
THEA-104	INTRO TO THEATRE AND DRAMA	3	8,000
Term		16	13,000
Cumulative		16	13,000
Term	Winter 1997	13	39,000
Cumulative		16	114,470.9

ENGL-152	INTRO MACROECON: PRINCIPLES	3	10,000
ENGL-102	HUMAN GEOGRAPHY	3	10,000
HIST-103	WORLD HISTORY TO 1649	3	11,000
HIST-200	AUSTRALIAN CONCEPTS	3	10,000
POSC-313	AMERICAN FOREIGN POLICY	3	10,000
Term		15	15,000
Cumulative		73	56,000
Term	Fall 1998	15	45,000
Cumulative		73	90,000

BISC-207	INTRODUCTORY BIOLOGY I	4	12,000
HIST-206	UNITED STATES HISTORY	(4)	17,000
HPER-120	BEGINNING BALLROOM DANCE	1	4,000
Term		8	4,000
Cumulative		24	17,000
Term	Spring 1997	3	12,000
Cumulative		16	51,000

ENGL-101	INTRO HISTORIC: PRINCIPLES	3	10,000
ENGL-120	WORLD HISTORICAL GEOGRAPHY	3	7,000
HIST-104	WORLD HISTORY 1649 TO PRESENT	3	11,000
POSC-105	AMERICAN POLITICAL SYSTEM	3	9,000
SPAN-106	SPANISH I - ELEMENTARY	4	9,333
Term		16	16,000
Cumulative		89	82,000
Term	Winter 1999	16	44,333
Cumulative		89	293,000

ENGL-110	CRITICAL READING & WRITING	3	7,000
ENGL-113	EARTH SCIENCE	4	2,000
HPER-120	MATH FOR FITNESS	1	4,000
MATH-252	MATH FOR ELEMENTARY SCHOOL I	3	9,000
Term		15	15,000
Cumulative		39	32,000
Term	Spring 1997	15	44,000
Cumulative		54	98,000

ENGL-107	SPANISH I - INTERMEDIATE	4	10,667
SPAN-207	CONFIDENTIAL LATIN AMERICA I	3	11,000
Term		7	2,000
Cumulative		96	89,000
Term	Winter 1999	7	21,667
Cumulative		96	227,667

ENGL-110	CRITICAL READING & WRITING	3	7,000
ENGL-113	EARTH SCIENCE	4	2,000
HPER-120	MATH FOR FITNESS	1	4,000
MATH-252	MATH FOR ELEMENTARY SCHOOL I	3	9,000
Term		15	15,000
Cumulative		39	32,000
Term	Spring 1997	15	44,000
Cumulative		54	98,000

ENGL-110	CRITICAL READING & WRITING	3	7,000
ENGL-113	EARTH SCIENCE	4	2,000
HPER-120	MATH FOR FITNESS	1	4,000
MATH-252	MATH FOR ELEMENTARY SCHOOL I	3	9,000
Term		15	15,000
Cumulative		39	32,000
Term	Spring 1997	15	44,000
Cumulative		54	98,000

13) Other Degrees:
 100-100 Bachelor's Degree
 500-200 Bachelor's Degree
 100-100 Advanced Placement Course
 100-100 General Education
 200-100 Ph.D. Degree

GRADUATE RESULTS: Number of students who are currently registered for graduate study in a Delaware program.

UNIVERSITY OF DELAWARE DELAWARE, DELAWARE 19703-3000

EMMA NEUBOHN MARIE KELLY

FEMALE

TRANSCRIPT LEGEND

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Spring 1999	ECON 300	INTERNED MICROECONOMIC THEORY						3	4.000
	HIST 101	UNIVERSITY IN THE CLASSROOM						3	10.000
	HIST 204	UNIFIED STATES HISTORY						3	9.000
								3	11.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								998/3294	

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Fall 1999	EDUC-304	ED PSYCHOLOGY: SOCIAL ASPECTS						3	11.000
	GEOG-203	ED PSYCHOLOGY: COGNITIVE ASPECTS						3	12.000
	MATH-114	INTRO TO COLLEGE MATH						3	10.000
		COLLEGE MATHEMATICS & STATISTICS						3	10.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								1563/4003	

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Winter 2000	HIST-367	REEL HIST: HOLLYWOOD & AMER PAINT						3	10.000
	THEA-102	INTRODUCTION TO PERFORMANCE						3	17.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								319.000	

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Spring 2000	CSCC-382	HISTORY OF WESTERN MEDICINE						3	7.000
	HIST-228	SEN-TRELAND 1916-PRESENT						3	10.000
	HIST-343	MEDIEVAL EUROPE: 1050-1350						3	10.000
	PHIL-302	MEDIEVAL PHILOSOPHY						3	11.000
	POSC-387	AMERICAN POTTY: A THOUGHT						3	6.000
	THEA-200	INTRO TO THEATRE PRODUCTION						3	10.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								1714/4559	

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Fall 2000	EDUC-420	READING IN THE CONTENT AREAS						1	4.000
	HESC-168	COACHING TRACK & FIELD						1	11.000
	HIST-368	MODERN CHINA: 1600-1920'S						3	9.000
	HIST-440	SEM: AFRICA UNDER COLONIAL RULE						3	11.000
	HIST-491	PLANNING A COURSE OF INSTRUCTION						3	11.000
	POSC-290	INTRODUCTION TO LAW						3	11.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								1449/3931	

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Spring 2001	EDUC-400	STUDENT TEACHING: SOCIAL STUDIES						1	6.000
	HIST-493	PROB IN CHG HIST & SOC SCI						1	11.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								170	0.000

Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Spring 2002	EDUC-400	STUDENT TEACHING: SOCIAL STUDIES						3	7.000
	HIST-493	PROB IN CHG HIST & SOC SCI						3	10.000
Term	Course	Section	CR	NC	IP	WF	Other	Total	Grade
Cumulative								182	156.000

EMMA NEUBOHN MARIE KELLY
 UNIVERSITY OF DELAWARE
 NEWARK, DELAWARE 19716-0225

TRANSCRIPT LEGEND
 ACADEMIC YEAR

The University of Delaware recognizes a student's progress in a degree program by awarding credit for courses completed. The transcript will show the student's progress in a degree program. The transcript will show the student's progress in a degree program. The transcript will show the student's progress in a degree program.

GRADUATE CREDIT
 Graduate credit is awarded to the University of Delaware only to those students who have earned a graduate degree from a regionally accredited institution. Graduate credit is awarded to the University of Delaware only to those students who have earned a graduate degree from a regionally accredited institution.

REQUIREMENTS
 A student must complete the requirements for a degree program. The transcript will show the student's progress in a degree program. The transcript will show the student's progress in a degree program.

UNIVERSITY OF DELAWARE
 NEWARK, DELAWARE 19716-0225

BEEBE MEDICAL CENTER
424 SAVANNAH ROAD
LEWES, DELAWARE 19958
(302) 645-3800

DATE OF ADMISSION: 11-1-95
DATE OF DISCHARGE: 11-4-95

DISCHARGE SUMMARY

FINAL DIAGNOSIS: Serous cyst of the left ovary with torsion.

HISTORY: She is a year old white female, Gravida 0, Para 0-0-0-0, whose last menstrual period was early October 1995. She was admitted for an exploratory laparotomy because of a large cyst in her left pelvic adnexa. She had abrupt onset of left lower quadrant abdominal pain on the morning of admission. She also had some nausea and vomiting.

PHYSICAL EXAM: She is a healthy white female in some distress. Blood pressure was 110/64. On the abdominal exam, the abdomen was flat, soft with hypoactive bowel sounds. Pelvic exam - The vagina showed normal mucosa. Cervix showed no inflammation. The uterus was midline and felt small. Adnexa on the right side was negative. The left side showed a large, irregular cyst. Rectal exam was confirmatory.

LAB DATA: Admitting CBC shows a hemoglobin of 15.2 gm/dl, hematocrit 43.3%. Serum pregnancy test was negative.

HOSPITAL COURSE: The patient had an exploratory laparotomy on 11-1-95 with excision of a large cystic left ovary plus the fallopian tube, both of which had torsion at their base. Postoperatively, the patient's hemoglobin was 12.9 gm/dl, hematocrit 35.5%. She had a normal postop course and was discharged on 11-4-95 to return to the office in two weeks.

NW/nas
dictated: 11-14-95
transcribed: 11-15-95
cc: Dr. Washburn

Nowell Washburn
Nowell Washburn, M.D.

DISCHARGE SUMMARY

Appendix FF



Meg Kelly

900 friends



Add to story

Edit profile



Meg Kelly



Intro

Edit bio



Followed by 202 people

Edit details

Add hobbies



Photos

[See all photos](#)



Friends

900 friends

[See all friends](#)



Kevin Daughaday



Ginger Turssline



Lori Cashman Funari



Josie Gay



Bethany Frick



Lisa Mathena



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What's on your mind?



Live video



Photo/video

Life event

Posts

Filters

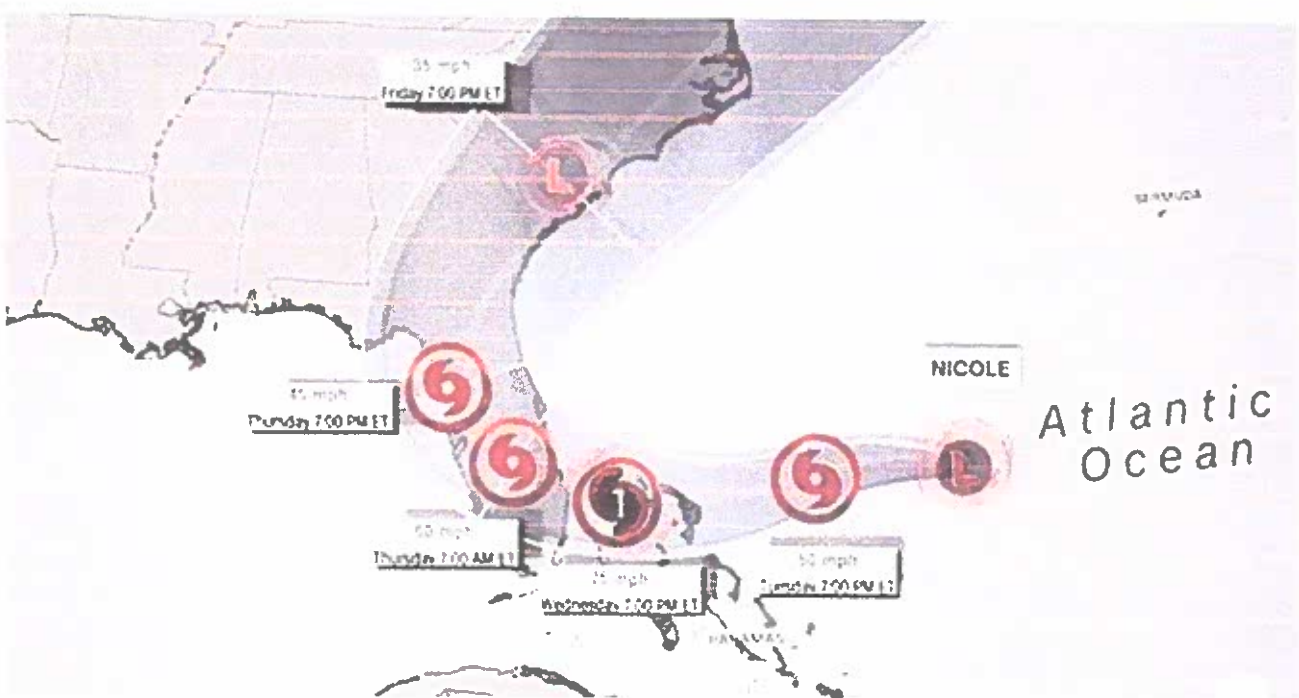
Manage posts



Other posts

 **Meg Kelly**
22m · 🌐

My pretty mom is a little scared about Hurricane Nicole. I do not like these cute human names for storms. Call it what it is. Please no more cute people names.



CNN.COM

Subtropical Storm Nicole is on track to strengthen into a Category 1 hurricane as it approaches Florida | CNN

- Like
- Comment
- Share

 Write a comment...

 **Meg Kelly**
58m · 🌐

It is not patriotic but evil to make the people pay and sacrifice to serve business greed under the lie of helping Ukraine or others. Shepherds tend the flock. Wolves eat the sheep they pretend to shepherd.



Just so you don't forget



Meg Kelly

1h · 🌐



WE are taught to not use our brains, which allows those who purport to know best to mislead us to harm and hell. Ignorance is not innocence. Please do not blindly seek answers from other people, experts and professionals or leaders or even me. Use your own brain and analyze information. It is naughty to tell you not to do your own research. You must use your own brain or you may be misled by others to harm or damnation in the fires of hell guys. Not my brain, but your own ... See more



Lori Cashman Funari

Like

Comment

Share



...



Meg Kelly shared a memory.

2h

So this was the day.



3 Years Ago
See your memories



Meg Kelly

November 8, 2019

I am having the worst day ever!!!

On the ride to Georgetown this morning, a cute old lady with white hair grimaced at me and gave me the middle finger.

Two people yesterday talked about me getting shot for my impeachment stickers. Do me a favor. STOP talking about shooting me please because someone may actually shoot me. I do not want to die. I want to live and speak life.... See more

Like

Comment



Write a comment...



Meg Kelly shared a memory.

2h



3 Years Ago
See your memories



Meg Kelly

November 8, 2019

During law school, the press were the only heroes that attempted to save me. Did I get saved, no. But they are still heroes.

We must safeguard the freedom of the press. They give a voice to the voiceless, a defense to the defenseless. They are heroes shedding light on the darkness, the darkness is giving into the temptation to ignore evil by covering it up with more darkness (ignorance) instead of driving it out with light, truth....



Meg Kelly shared a memory. 2h · 🌐



3 Years Ago
See your memories



Meg Kelly
November 8, 2019 · 🌐

Delaware screwed us in the past with the dedications of land (gifts of land to delaware) on the condition that the land never be sold. The intent of the gifts to the government was to preserve nature and wet lands.
Those dancing dollar signs tempted delaware leaders to misbehave.
They created 99 year leases. They allowed the destruction of trees and mortgaged homes on leaser' lands defeating the purpose preserving wetlands, trees and nature.



Write a comment

Meg Kelly shared a memory. 2h

Vote Steve Smyk. He was my hero reflecting true leadership 4 years from today. Love you guys. He is not a mere republican. He helps all people regardless of diverse party affiliation or beliefs. Steve Smyk is special. So are you guys. Love you

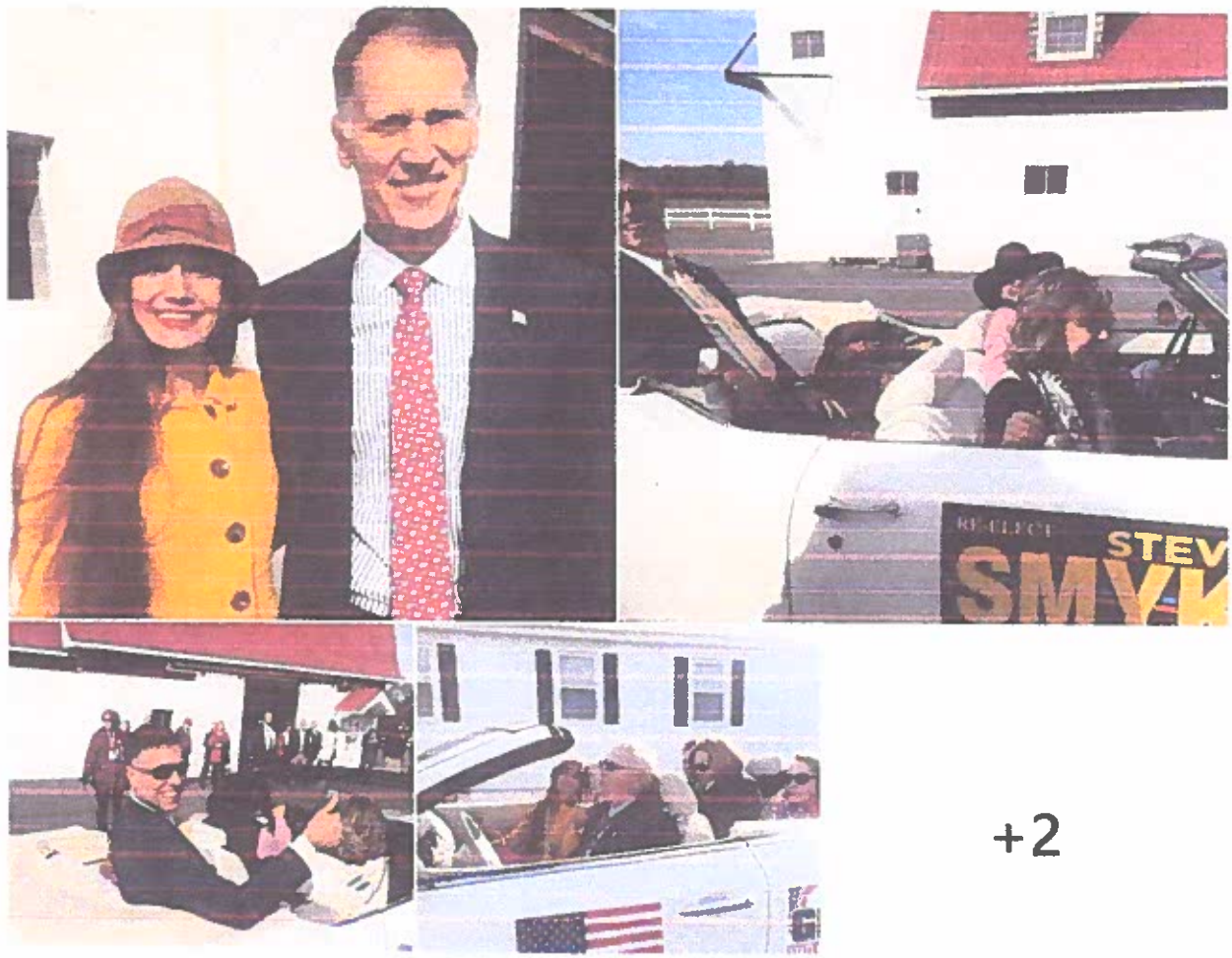


4 Years Ago See your memories



Meg Kelly is with Stephen Smyk. November 8, 2018

I am grateful for the kindness Steve Smyk bestowed on me today by allowing me the honor to ride with him. He represents burying the hatchet. He represents the hope we have with our new leaders including Colleen Daves and Kathy McGuiness. He's respectful and kind to all and honest. Years ago he reached out to me when he respectfully disagreed on my position relating to the death penalty. I appreciated it. I was really impressed. Did either of us change our mind, no. But he is ... See more



+2



Like

Comment



Write a comment...



Meg Kelly shared a memory.

2h · 🌐



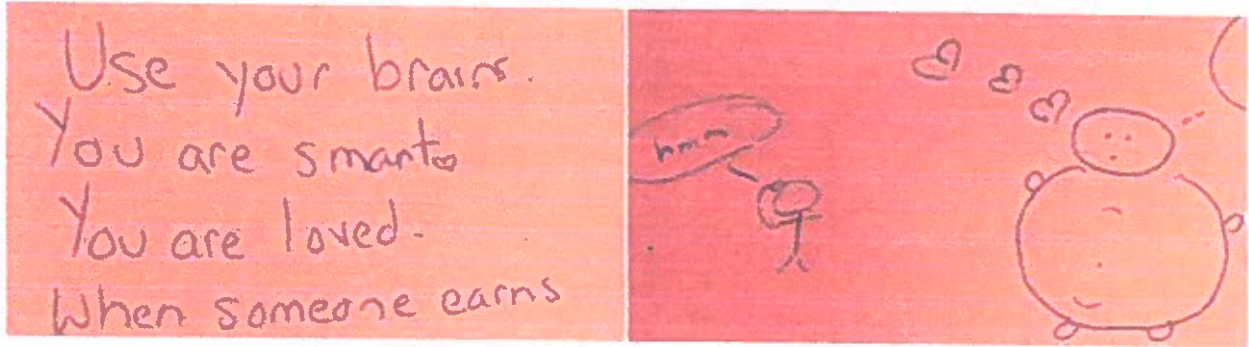
3 Years Ago
See your memories



Meg Kelly

November 8 2019 · 🌐

I am crying because people keep pimping out beloved Jesus to fill their pockets, not hearts with love When I get really sad, I draft fat bellied cartoons. You are precious guys. You are not for sale. You are free. You are priceless not a price tag. I love you. You are loved as is. Accept it. Reflect it.



Meg Kelly

2h

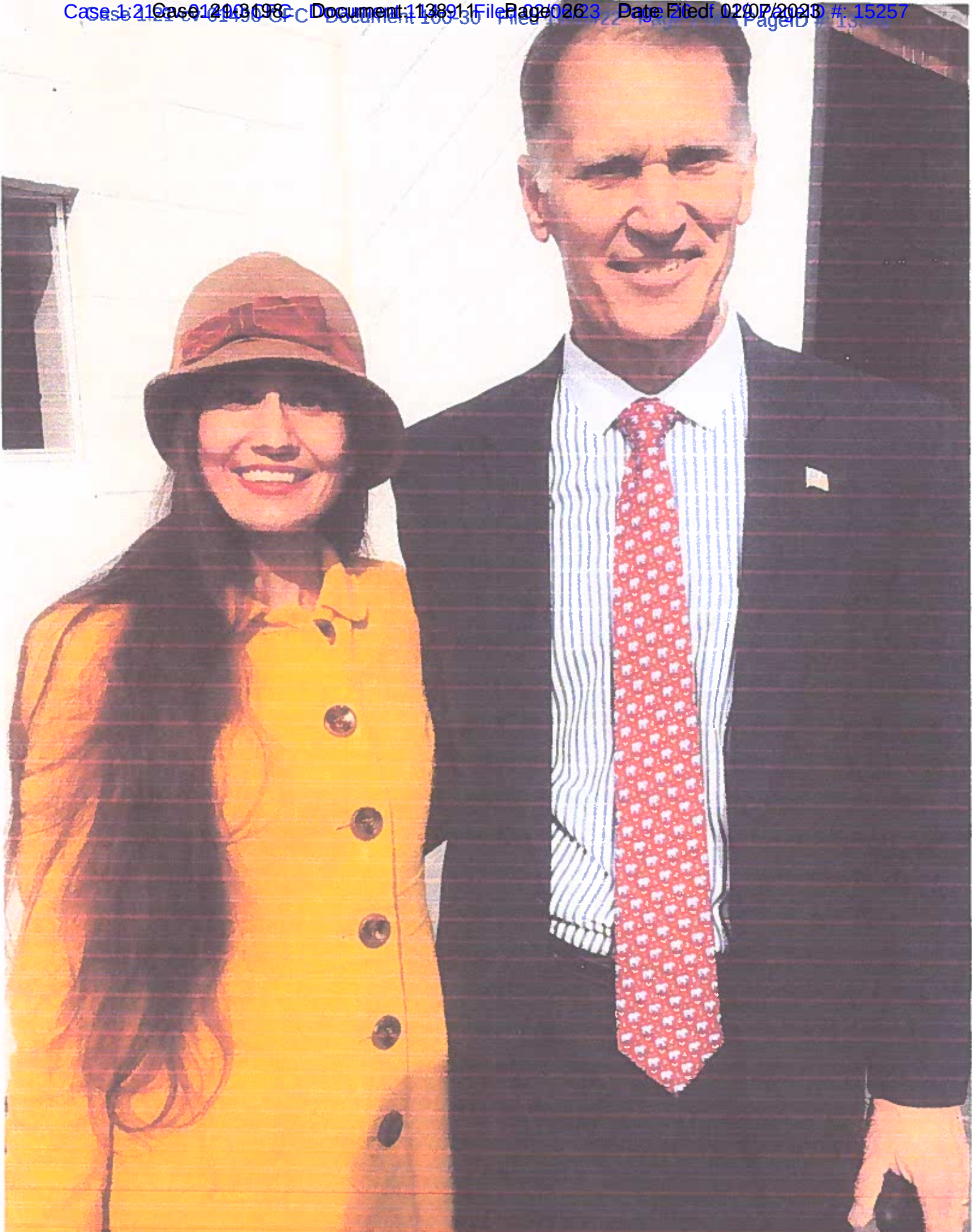


Vote Colleen Davies. I grew up with our state treasurer, albeit I am older. We both played soccer on the boys soccer team in high school. I went to church with her family and dated her handsome brother, Charles Carroll, when I was a child. He is probably so embarrassed now. Colleen is an olive branch that extends to all, regardless of party. Guys her dad used to be the head of the Republican party in Sussex. She is heavily supported by Democrats and is a democrat that truly ... See more





Exhibit J









Case 1:21-cv-00319 Document 1-1 Filed 02/07/23 Page 3 of 3



Appendix GG

What evidence supports this and what does it tell us about what lies ahead? The early signs point to a wave of labour-substitutive innovation across multiple industries and job categories which will likely happen in the coming decades.

Labour substitution

Many different categories of work, particularly those that involve mechanically repetitive and precise manual labour, have already been automated. Many others will follow, as computing power continues to grow exponentially. Sooner than most anticipate, the work of professions as different as lawyers, financial analysts, doctors, journalists, accountants, insurance underwriters or librarians may be partly or completely automated.

So far, the evidence is this: The fourth industrial revolution seems to be creating fewer jobs in new industries than previous revolutions. According to an estimate from the Oxford Martin Programme on Technology and Employment, only 0.5% of the US workforce is employed in industries that did not exist at the turn of the century, a far lower percentage than the approximately 8% of new jobs created in new industries during the 1980s and the 4.5% of new jobs created during the 1990s. This is corroborated by a recent US Economic Census, which sheds some interesting light on the relationship between technology and unemployment. It shows that innovations in information and other disruptive technologies tend to raise productivity by replacing existing workers, rather than creating new products needing more labour to produce them.

Two researchers from the Oxford Martin School, economist Carl Benedikt Frey and machine learning expert Michael Osborne, have quantified the potential effect of technological innovation on unemployment by ranking 702 different professions according to their probability of being automated, from the least susceptible to the risk of automation (“0” corresponding to no risk at all) to those that are the most susceptible to the risk (“1” corresponding to a certain risk of the job being replaced by a computer of some sort).²³ In Table 2 below, I highlight certain professions that are most likely to be automated, and those least likely.

This research concludes that about 47% of total employment in the US is at risk, perhaps over the next decade or two, characterized by a much broader

scope of job destruction at a much faster pace than labour market shifts experienced in previous industrial revolutions. In addition, the trend is towards greater polarization in the labour market. Employment will grow in high-income cognitive and creative jobs and low-income manual occupations, but it will greatly diminish for middle-income routine and repetitive jobs.

Appendix HH

5

(4) The strong and rapid emergence of cryptocurrencies, and more broadly fintech, entangles economics with technological innovation in such a complex way that it makes it hard to identify how the causality runs and what some of the potential applications and policy implications might be. Analysts and media reports give the impression that national currencies already compete with cryptocurrencies since individuals and institutions can hold digital wallets with whichever crypto asset they chose. As Parag Khanna states:

We are about to enter an age of global monetary competition, where national currencies must earn their place in someone's wallet portfolio every hour of every day, even among citizens of their own countries. The digital version of the Japanese yen will be plunged into head-to-head global competition with the Swiss franc, the Brazilian real, and any other asset with an open capital account, including Bitcoin. Everyone becomes a foreign-exchange trader, all the time, and only the best national currencies – or cryptocurrencies – are ever held by anyone.³⁴

Elimination of fiat \$ to trackable money coins at the pleasure of banks

It might be that government-supported cryptocurrencies compete with each other, as hinted at by Khanna. If they do so, they'd blur the line with fiat money and would change the financial system in terms of financial stability and traditional monetary policy in a way that nobody can yet predict.

Currently, both monetary authorities and private institutions issue cryptocurrencies as viable, mainstream payment vehicles. Central banks and governments experiment with "govcoins", or Central Bank Digital Currencies, while private "sponsors" develop "stablecoins" – cryptocurrencies whose value is pegged to the value of an underlying asset. The trajectory and endgame for govcoins and stablecoins remain unknown, but their respective fates may ultimately be decided by adoption and above all regulation (the power of the state). The only certainty: their economic, societal and possibly geopolitical impacts will be considerable. Will physical cash still be accepted? Will cryptocurrencies pervade our privacy? How will they redefine the role of technology in our daily lives? What will their impact be on the effectiveness of monetary policy? Could they foster greater financial inclusion? Could cryptocurrencies advance environmental objectives and the policies that support them? Could they be used to accelerate the demise of the US dollar? Will

They predict it, they plan it in their agenda.

The elimination of the dollar is discussed in other WEF documents (80 of 771)

73

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 innovations¹¹⁷ 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.¹¹⁸ 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 involves¹¹⁹ 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.

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

The rule of law is the "product of the bankers' imagination" when bankers gain more & the worse off we are. This is terribly horrifying.

Appendix II

Meaning
Banks will
Control
govern and
control
governments
until their
eliminate

Judges are in danger
Please give me
time to
gather
evidence to
show you.

these circumstances, help in the form of grants and debt relief, and possibly an outright moratorium,^[46] will not only be needed but will be critical.

These are unprecedented programmes for an unprecedented situation, something so new that the economist Carmen Reinhart has called it a "whatever-it-takes moment for large-scale, outside-the-box fiscal and monetary policies".^[47] Measures that would have seemed inconceivable prior to the pandemic may well become standard around the world as governments try to prevent the economic recession from turning into a catastrophic depression. Increasingly, there will be calls for government to act as a "payer of last resort"^[48] to prevent or stem the spate of mass layoffs and business destruction triggered by the pandemic.

I pulled
videos
from the
World
Government
Summit

All these changes are altering the rules of the economic and monetary policy "game". The artificial barrier that makes monetary and fiscal authorities independent from each other has now been dismantled, with central bankers becoming (to a relative degree) subservient to elected politicians. It is now conceivable that, in the future, government will try to wield its influence over central banks to finance major public projects, such as an infrastructure or green investment fund. Similarly, the precept that government can intervene to preserve workers' jobs or incomes and protect companies from bankruptcy may endure after these policies come to an end. It is likely that public and political pressure to maintain such schemes will persist, even when the situation improves. One of the greatest concerns is that this implicit cooperation between fiscal and monetary policies leads to uncontrollable inflation. It originates in the idea that policy-makers will deploy massive fiscal stimulus that will be fully monetized, i.e. not financed through standard government debt. This is where Modern Monetary Theory (MMT) and helicopter money come in: with interest rates hovering around zero, central banks cannot stimulate the economy by classic monetary tools; i.e. a reduction in interest rates – unless they decided to go for deeply negative interest rates, a problematic move resisted by most central banks.^[49] The stimulus must therefore come from an increase in fiscal deficits

we
and suffer
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Other
plans to
eliminate
the courts
who protect
freedom from
being sacrificed
to the mob's
lusts through
the majority
vote.

allows
the transfer
to eliminate
not only
that currency
but judges
down to
line for

The effect of elimination of courts is individual liberty will be eliminated. The masses will be displeased with elected officials and beg for a new system. My Grandpa's brother was head of the FBI before he died.
 52
 683 of 771

Through temptations controlling others
Followers of Jesus use their brains to think things out filtered by the word of God to lay down their desires to love to overcome lusts

Politicians are not for sale and should not be bought

Government, are not for sale or they are slaves not free

angry. It is crucial to remember that anger, joy, boredom and love are biological phenomena just like fever and a cough. The same technology that identifies coughs could also identify laughs. If corporations and governments start harvesting our biometric data en masse, they can get to know us far better than we know ourselves, and they can then not just predict our feelings but also manipulate our feelings and sell us anything they want — be it a product or a politician. Biometric monitoring would make Cambridge Analytica's data hacking tactics look like something from the Stone Age. Imagine North Korea in 2030, when every citizen has to wear a biometric bracelet 24 hours a day. If you listen to a speech by the Great Leader and the bracelet picks up the tell-tale signs of anger, you are done for.^[128]

Feelings do not control people if they use their brain to choose to overcome desires a.k.a. temptations

Schemers, Schemers maybe unarrested by Courts.

We will have been warned! Some social commentators like Evgeny Morozov go even further, convinced that the pandemic heralds a dark future of techno-totalitarian state surveillance. His argument, premised upon the concept of "technological solutionism" put forward in a book written in 2012, posits that the tech "solutions" offered to contain the pandemic will necessarily take the surveillance state to the next level. He sees evidence of this in two distinct strands of "solutionism" in government responses to the pandemic that he has identified. On the one hand, there are "progressive solutionists" who believe that the appropriate exposure through an app to the right information about infection could make people behave in the public interest. On the other hand, there are "punitive solutionists" determined to use the vast digital surveillance infrastructure to curb our daily activities and punish any transgressions. What Morozov perceives as the greatest and ultimate danger to our political systems and liberties is that the "successful" example of tech in monitoring and containing the pandemic will then "entrench the solutionist toolkit as the default option for addressing all other existential problems — from inequality to climate change. After all, it is much easier to deploy solutionist tech to influence individual behaviour than it is to ask difficult political questions about the root causes of these crises".^[129]

This is deceit Technology can be programmed to detect smiles or grimaces but they can not know the minds of man.

We have free will no matter the forced situation

(meaning that public expenditure will go up at a time when tax revenues decline). Put in the simplest possible (and, in this case, simplistic) terms, MMT runs like this: governments will issue some debt that the central bank will buy. If it never sells it back, it equates to monetary finance: the deficit is monetized (by the central bank purchasing the bonds that the government issues) and the government can use the money as it sees fit. It can, for example, metaphorically drop it from helicopters to those people in need. The idea is appealing and realizable, but it contains a major issue of social expectations and political control: once citizens realize that money can be found on a "magic money tree", elected politicians will be under fierce and relentless public pressure to create more and more, which is when the issue of inflation kicks in.

1.2.3.1. Deflation or inflation?

Two technical elements embedded in the issue of monetary finance are associated with the risk of inflation. First, the decision to engage in perpetual quantitative easing (i.e. in monetary finance) doesn't have to be taken when the central bank buys the debt issued by the government; it can be left to the contingent future to hide or circumvent the idea that money "grows on trees". Second, the inflationary impact of helicopter money is not related to whether the deficit is funded or unfunded, but is directly proportional to the amount of money involved. There are no nominal limits to how much money a central bank can create, but there are sensible limits to how much they would want to create to achieve reflation without risking too much inflation. The resultant increase in nominal GDP will be split between a real output effect and an increase in price level effect – this balance and its inflationary nature will depend on how tight the supply constraints are, so ultimately on the amount of money created. Central bankers may decide that there is nothing to worry about with inflation at 2% or 3%, and that 4% to 5% is also fine, but they will have to define an upper limit at which inflation becomes disruptive and a real concern. The challenge will be to determine at what

No limits on Banks mean no law - we need the courts to tame the banks from sacrificial freedom by compelling Congress to coin instead of being controlled by those who make it

✱ ✱

proportional

out of thin air who gain more debt control and profit on interest then a worse off we are - My understanding, the elimination of fiat \$ is just a transition for worse plans in decades to come we need the courts 685 of 771

Sacrificing
Freedom to
be controlled
by those
who enter
our
desires
by rewards
threat of harm
or more
survival.

slavery is
death in hell

Another important and far-reaching consequence of velocity is that decision-makers have more information and more analysis than ever before, but less time to decide. For politicians and business leaders, the need to gain a strategic perspective collides ever-more frequently with the day-to-day pressures of immediate decisions, particularly obvious in the context of the pandemic, and reinforced by complexity, as we see in the next section.

1.1.3. Complexity

No doing this is elimination of
Freedom to be enslaved

In its simplest possible form, complexity can be defined as what we don't understand or find difficult to understand. As for a complex system, the psychologist Herbert Simon defined it as "one made up of a large number of parts that interact in a nonsimple way".^[11] Complex systems are often characterized by an absence of visible causal links between their elements, which makes them virtually impossible to predict. Deep in ourselves, we sense that the more complex a system is, the greater the likelihood that something might go wrong and that an accident or an aberration might occur and propagate.

and
controlled
by those
who
enter
our
collective
strategic
action
convinced
selfish
desires
not
free by
laying down
our desire
to use our
brains to
do what
is right

Complexity can roughly be measured by three factors: "1) the amount of information content or the number of components in a system; 2) the interconnectedness – defined as the dynamic of reciprocal responsiveness – between these pieces of information or components; and 3) the effect of non-linearity (non-linear elements are often called 'tipping points'). Non-linearity is a key feature of complexity because it means that a change in just one component of a system can lead to a surprising and disproportionate effect elsewhere."^[12] It is for this reason that pandemic models so often yield wide ranges of outcomes: a difference of assumption regarding just one component of the model can dramatically affect the end result. When one hears about "black swans", "known unknowns" or "butterfly effects", non-linearity is at work; it thus comes as no surprise that we often associate world complexity with "surprises", "turbulence" and "uncertainty". For example, in 2008, how many "experts" anticipated that mortgage-backed securities originating in the United States would cripple banks around the world and ultimately

not giving into temptation --
Free by using our brains

Appendix JJ

policy.^[50] The probability of each individually is already low, so the probability of the three occurring in conjunction with each other is extremely low (but not nil). Bond investors think alike. This could change, of course, but at the moment the low rate differential between nominal and inflation-indexed bonds paints a picture of ongoing very low inflation at best.

In the coming years, high-income countries may well face a situation similar to that of Japan over the past few decades: structurally weak demand, very low inflation and ultra-low interest rates. The possible “Japanification” of the (rich) world is often depicted as a hopeless combination of no growth, no inflation and insufferable debt levels. This is misleading. When the data is adjusted for demographics, Japan does better than most. Its GDP per capita is high and growing and, since 2007, its real GDP per member of the working age population has risen faster than in any other G7 country. Naturally, there are many idiosyncratic reasons for this (a very high level of social capital and trust, but also labour productivity growth that surpasses the average, and a successful absorption of elderly workers into the labour force), but it shows that a shrinking population doesn't have to lead to economic oblivion. Japan's high living standards and well-being indicators offer a salutary lesson that there is hope in the face of economic hardship.

1.2.3.2. The fate of the US dollar

For decades, the US has enjoyed the “exorbitant privilege” of retaining the global currency reserve, a status that has long been “a perk of imperial might and an economic elixir”.^[51] To a considerable extent, American power and prosperity have been built and reinforced by the global trust in the dollar and the willingness of customers abroad to hold it, most often in the form of US government bonds. The fact that so many countries and foreign institutions want to hold dollars as a store of value and as an instrument of exchange (for trade) has anchored its status as the global reserve currency. This has enabled the US to borrow cheaply abroad and benefit from low interest rates at home, which in turn has allowed Americans to consume beyond their means. It

has also made large recent US government deficits possible, permitted the US to run substantial trade deficits, reduced the exchange-rate risk and made the US financial markets more liquid. At the core of the US dollar status as a reserve currency lies a critical issue of trust: non-Americans who hold dollars trust that the United States will protect both its own interests (by managing sensibly its economy) and the rest of the world as far as the US dollar is concerned (by managing sensibly its currency, like providing dollar liquidity to the global financial system efficiently and rapidly).

For quite some time, some analysts and policy-makers have been considering a possible and progressive end to the dominance of the dollar. They now think that the pandemic might be the catalyst that proves them right. Their argument is twofold and relates to both sides of the trust issue.

On the one hand (managing the economy sensibly), doubters of US dollar dominance point to the inevitable and sharp deterioration of the US fiscal position. In their mind, unsustainable levels of debt will eventually erode confidence in the US dollar. Just prior to the pandemic, US defence spending, plus interest on the federal debt, plus annual entitlement payments – Medicare, Medicaid and social security – represented 112% of federal tax receipts (versus 95% in 2017). This unsustainable path will worsen in the post-pandemic, post-bailout era. This argument suggests that something major will therefore have to change, either through a much reduced geopolitical role or higher taxation, or both, otherwise the rising deficit will reach a threshold beyond which non-US investors are unwilling to fund it. After all, the status of reserve currency cannot last longer than foreign confidence in the ability of the holder to honour its payments.

On the other hand (managing the US dollar sensibly for the rest of the world), doubters of the dollar's dominance point to the incompatibility of its status as a global reserve currency with rising economic nationalism at home. Even though the Fed and the US Treasury manage the dollar and its influential network worldwide with efficacy, sceptics emphasize that the willingness of the US

hell exaltant
The solution they sell, cryptocurrency

administration to weaponize the US dollar for geopolitical purposes (like punishing countries and companies that trade with Iran or North Korea) will inevitably incentivize dollar holders to look for alternatives.

Are there any viable alternatives? The US remains a formidable global financial hegemon (the role of the dollar in international financial transactions is far greater, albeit less visible, than in international trade), but it is also true that many countries would like to challenge the dollar's global dominance. In the short term, there are no alternatives. The Chinese renminbi (RMB) could be an option, but not until strict capital controls are eliminated and the RMB turns into a market-determined currency, which is unlikely to happen in the foreseeable future. The same goes for the euro; it could be an option, but not until doubts about a possible implosion of the eurozone dissipate for good, which again is an unlikely prospect in the next few years. As for a global virtual currency, there is none in sight yet, but there are attempts to launch national digital currencies that may eventually dethrone the US dollar supremacy. The most significant one took place in China at the end of April 2020 with a test of a national digital currency in four large cities.^[52] The country is years ahead of the rest of the world in developing a digital currency combined with powerful electronic payment platforms; this experiment clearly shows that there are monetary systems that are trying to become independent from US intermediaries while moving towards greater digitization.

Ultimately, the possible end of the US dollar's primacy will depend on what happens in the US. As Henry Paulson, a former US Treasury Secretary, says: "US dollar prominence begins at home (...). The United States must maintain an economy that inspires global credibility and confidence. Failure to do so will, over time, put the US dollar's position in peril".^[53] To a large extent, US global credibility also depends on geopolitics and the appeal of its social model. The "exorbitant privilege" is intricately intertwined with global power, the perception of the US as a reliable partner and its role in the working of multilateral institutions. "If that role were seen as less sure and that security

guarantee as less iron clad, because the US was disengaging from global geopolitics in favour of more stand-alone, inward-looking policies, the security premium enjoyed by the US dollar could diminish,” warns Barry Eichengreen and European Central Bank representatives.^[54]

Questions and doubts about the future status of the dollar as a global currency reserve are an apt reminder that economics does not exist in isolation. This reality is particularly harsh in over-indebted emerging and poor countries now unable to repay their debt often denominated in dollars. For them, this crisis will take on huge proportions and years to sort out, with considerable economic damage translating fast into social and humanitarian pain. In all these countries, the COVID crisis may well end the gradual process of convergence that was supposed to bring highly developed and emerging or developing countries into closer alignment. This will lead to an increase in societal and geopolitical risks – a stark reminder of the extent to which economic risks intersect with societal issues and geopolitics.

Appendix KK

Robot justice: China's use of Internet courts

By Tara Vasdani

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Would it scare you if I said that China has been doing this since 2017?

In December 2019, China has announced that millions of legal cases are now being decided by "Internet courts" that do not require citizens to appear in court. The "smart court" includes non-human judges, powered by artificial intelligence (AI) and allows participants to register their cases online and resolve their matters via a digital court hearing.

The Chinese Internet courts handle a variety of disputes, which include intellectual property, e-commerce, financial disputes related to online conduct, loans acquired or performed online, domain name issues, property and civil rights cases involving the Internet, product liability arising from online purchases and certain administrative disputes. In Beijing, the average duration of a case is 40 days; the average dispositive hearing lasts 37 minutes; almost 80 per cent of the litigants before the Chinese Internet courts are individuals, and 20 per cent corporate entities; and 98 per cent of the rulings have been accepted without appeal.

It is 2020. Your Canadian commercial dispute is paperless. A document management platform sifts through all parties' documents to flag relevant vs. non-relevant documents. A subsequent platform reviews the relevant documents, and tells you that your case has the stronger evidentiary background.

A legal research tool in the meantime is determining whether a shareholder may attract wages for services performed, or simply be paid dividends. It's time to move to summary judgment. An Online Dispute Resolution (ODR) tool reviews your motion materials, your Affidavit (e-signed) and the Responding Record. An AI judge flags a case from 1970 that still applies today and — you win your dispute. The decision can be appealed to a human judge.

Cost savings? Astronomical. A preliminary decision? Within one month. The AI judge's eye for 1970 case law? Well, he's not hungry or tired like your articling student.

China's first Internet court was established in the eastern city of Hangzhou in 2017 and in 2019, it was reported that users completed more than 3.1 million legal activities using the court system from March

through to October. More than one million citizens were registered with the system, along with approximately 73,000 lawyers.

Judicial officials recently invited reporters to the Hangzhou Internet court to see how it operates. In a demonstration, citizens were seen using video messaging to communicate with the AI judges, and the following was observed:

"Does the defendant have any objection to the nature of the judicial blockchain evidence submitted by the plaintiff?" a virtual judge asked during a pretrial meeting. The non-human judge was represented in the system by an image of a man wearing a black robe.

"No objection," the human plaintiff answered.

The judges "appeared" by hologram and are artificial creations — there is no real judge present. The holographic judge looks like a real person but is a synthesized, 3D image of different judges, and sets schedules, asks litigants questions, takes evidence and issues dispositive rulings.

A Hangzhou court official told China's state-run CGTN television network that the Internet court system operates 24 hours a day, seven days a week.

In today's marketplace where almost everything is purchased or transacted online, the potential for this type of court system is significant.

In a previous article (<https://www.thelawyersdaily.ca/articles/11582/estonia-set-to-introduce-ai-judge-in-small-claims-court-to-clear-court-backlog->), I commented on Estonia's adoption of an AI judge to settle small claims disputes. Prior to that, I commented on the Ontario Superior Court of Justice's pilot project launched on Feb. 11, 2019, the Digital Hearing Workspace (<https://www.thelawyersdaily.ca/articles/10192/digital-hearing-workspace-pilot-project-one-step-closer-to-court-modernization->) (DHW). The program is currently used to deliver, store, organize and retrieve all documents relevant to a file, electronically. It applies to all Commercial List proceedings, and failure to upload documents to the platform is addressed by a presiding court official.

Combined with an ODR system or AI-powered judges, and considering the backlog of civil and commercial disputes experienced by litigants in Canada, the idea of an AI judge seems to resolve many current issues. And it is not too far from our midst.

The U.S. recently forecasted a time when AI-driven legal assistants might be presenting judges with case law, precedents and the background needed to make a decision. Hear that? Legal assistants.

In 2019, I reviewed a very helpful, and very vanguard legal research AI tool championed by the Toronto-based company, Alexsei.

Tools such as Alexsei use machine learning to identify relevant and up-to-date case law across the web and

scan the Internet to discern lawyers' opinions on cases as identified in their legal blogs. The software then generates a legal memorandum within 24 hours of being asked a legal research question.

China, or Estonia as I reported in 2019, are not the first to mix AI and the law. In the United States, algorithms assist in recommending criminal sentences. The widely popular U.K.-based app DoNotPay, an AI-driven chatbot, overturned 160,000 parking tickets in London and New York a few years ago.

The international deployment of Internet courts is just another step in the saga of the eventual automation of certain legal tasks and processes.

Taken in harmony, the last year in Canada alone saw the adoption of directives within the federal government regarding AI's replacement of mundane administrative tasks; judges' reprisal for the failure to use legal research AI tools to assist in conducting research and saving client legal fees; the DHW, requiring counsel and parties to upload their documents to an electronic filing system; and my personal favourite, Google's Duplex which I hope will arrive into our industry soon.

All in all, I repeat, adopt and reiterate that the legal industry's resistance to the above changes will create great hurdles to lawyers and their staff alike. Modern judiciaries have already begun to expect the employ of legal tech tools by counsel, students and the courts. Should lawyers choose not to live up to the challenge, they could end up with a very disappointed client, potentially large and assessment-worthy client cost consequences and since 2017, an algorithm's reprisal.

Tara Vasdani is the principal lawyer and founder of Remote Law Canada (<https://www.remotelawcanada.com/>). Her practice centres on employment law, civil litigation and remote work. She has been featured in Forbes. She was the first Canadian lawyer to serve a statement of claim via Instagram, and you can reach her directly at tara@remotelawcanada.com (<mailto:tara@remotelawcanada.com>).

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Appendix LL

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Dollar debt in FX swaps and forwards: huge, missing and growing¹

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.

Banks write \$1 don't have the instructions in any sense it is not treated as is not to pay

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".² 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

\$80 trillion - tied to government pensions, possibly even offshore's

BIS Money Global Churn

¹ We thank Stefan Avdjiev, Stijn Claessens, Mathias Drehmann, Hyun Song Shin, Nikola Tarashev and Goetz von Peter for useful comments. Branimir Gruić 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.

² 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.

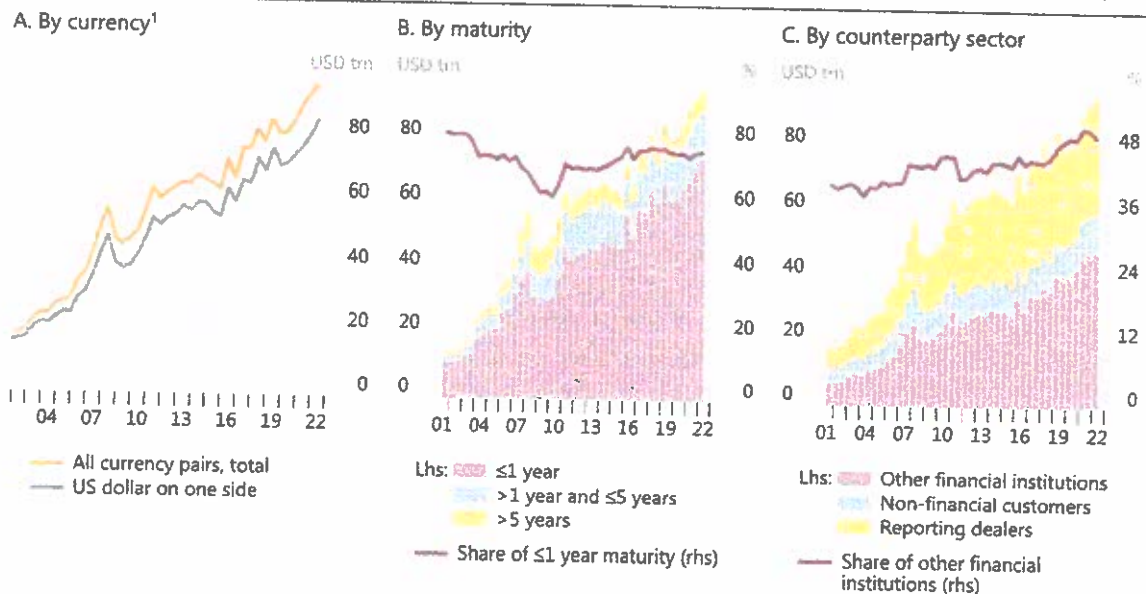
FX swaps/forwards and currency swaps: some stylised facts

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.

I + IS
not
the
Needles
to pay.

FX swaps, FX forwards and currency swaps outstanding Graph 1



¹ 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 (NBFIs), proxied by “other financial institutions”³ 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

³ 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.

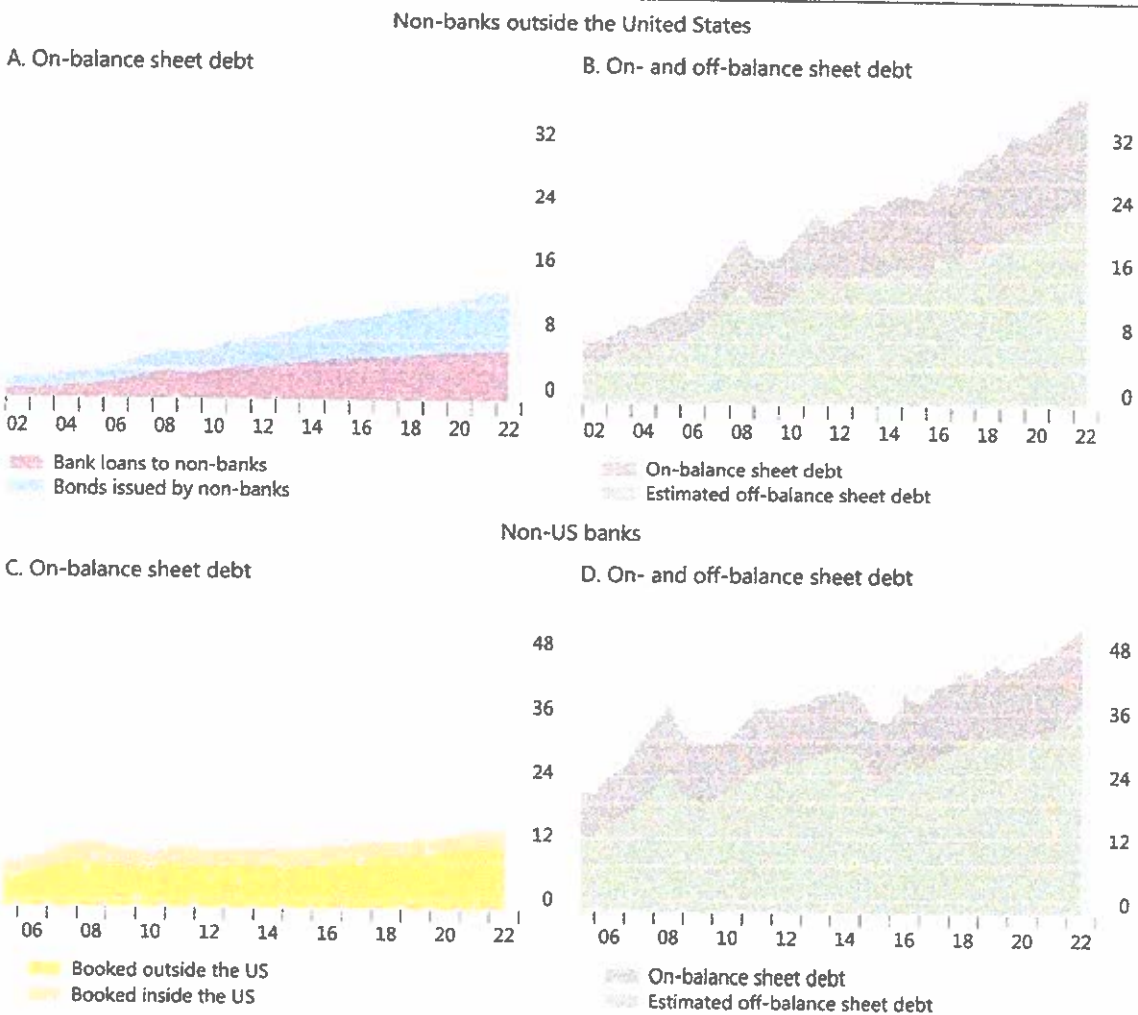
customers. Non-banks had dollar obligations of half of this amount, \$26 trillion.⁴ This sum has been growing strongly, from \$17 trillion in 2016 (Graph 2.B).

This \$26 trillion dollar debt is likely owed by entities *outside* the United States, for which the dollar is a foreign currency.⁵ 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 debt¹

In trillions of US dollars

Graph 2



¹ 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).

⁴ 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.

⁵ 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.⁶

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.⁷ 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.⁸

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,⁹ 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 leverage¹⁰ 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.

Banks write
to pay off
to lend out
if not in
position
to do so
it does not
exist.

- ⁶ 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.
- ⁷ 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.
- ⁸ Total liabilities were \$92 trillion as reported by internationally active banks from 26 (of 31) jurisdictions that report the BIS consolidated banking statistics.
- ⁹ 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.
- ¹⁰ 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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There's an \$80 trillion 'blind spot' in the financial system that could spell trouble for markets as debts held off-balance sheet grow at a rapid pace

Matthew Fox Dec 7, 2022, 2:48 PM



John W Banagan / Investing

There's a growing pile of hidden debts that could shock markets, according to the Bank for International Settlements.

BIS said there's more than \$65 trillion in currency related debts that has little transparency and is growing quickly.

A lack of supply of US dollars could create a systemic financial event that roils markets, BIS said.

held off balance sheets

There is more than \$80 trillion in hidden debts held by shadow banks and non-US banks that could ultimately spell trouble for markets.

That's because the debt is held off of balance sheets, and therefore a lack of transparency makes it all the more difficult for central bank officials to fully grasp just how big and impactful this lurking debt could be in the event of a stressful market event.

According to the Bank for International Settlements, the massive debt pile is tied to foreign currency swaps and represents repayment obligations between different financial institutions that have yet to be settled. For example, a foreign investment firm that wants to buy US assets, like a US-listed stock, would first have to

convert their foreign currency to US dollars, often via a foreign-currency swap, and then buy the asset.

But for as long as the foreign investment firm holds onto the US-based asset, there's an ongoing currency obligation it owes until the trade is closed out. And that obligation is recorded off the balance sheets of financial institutions. This makes it difficult for central bank policymakers to fully grasp the potential demand for US dollars amid a volatile market event.

While the obligations are relatively safe, short-term, and backed by hard currencies, it could still be vulnerable during periods of high stress in the market.

"FX Swap markets are vulnerable to funding squeezes. This was evident during the Great Financial Crisis and again in March 2020 when the COVID-19 pandemic wrought havoc. For all the differences between 2008 and 2020, swaps emerged in both episodes as flash points, with dollar borrowers forced to pay high rates if they could borrow at all," BIS explained in a Monday note.

The BIS calls it a "blind spot" for the financial system, and the hidden debt is growing quickly, having more than doubled since 2008.

What's most concerning to the BIS is the lack of data and transparency around to these ballooning debts. That lack of visibility could make it all the more difficult for the Fed to alleviate market stresses in the event that supplies of the US dollar suddenly dried up.

"It is not even clear how many analysts are aware of the existence of the large off-balance sheet obligations. In times of crises, policies to restore the smooth flow of short-term dollars in the financial system — for instance, central bank swap lines — are set in a fog," BIS said.

That's why the BIS is trying to get a handle on just how big the off-balance sheet debt is, though it admits its recently updated data is likely not a full representation of the currency obligations.

"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 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," BIS concluded.

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Appendix MM

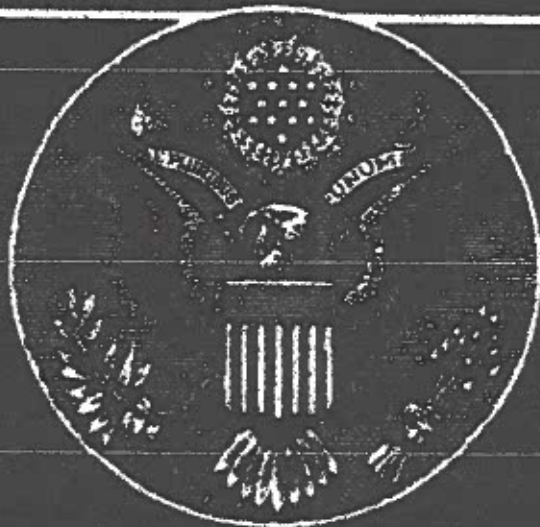
The Creature

from

Jekyll Island

by G. Edward Griffin

A Second Look at the Federal Reserve



LOAVES AND FISHES AND CIVIL WAR 363

times the amount of the bank's capital actually held in the vault. Furthermore, this could not be in the form of paper money, bonds, securities, or other debt instruments; it had to be strictly gold or silver coin. Also, the banks were limited in the number of small-denomination bank notes they could issue and, in this, Massachusetts served as the model for Jackson's attempted reform at the federal level. By previous standards, and certainly by the standards that prevail today, this was an exceptionally conservative policy. In fact, even during the previous stress of the War of 1812, when banks were failing by the hundreds across the country, the Massachusetts banks, and most of the other New England banks as well, were able to maintain full payment in specie.

With the passage of time, however, the limit on bank notes became less important, because the banks now were using checkbook money instead. Their paper notes may have been limited to two-hundred per cent of their capital, but there was no effective limit to the numbers they could ink into people's deposit books. So the "fraction" in fractional-reserve banking began to shrink again. Consequently, the monetary contraction of 1837 "was like a scythe over the crop," says Groseclose, and thirty-two Massachusetts banks collapsed between that year and 1844.¹

The state attempted to patch the system by instituting a network of bank examiners and by increasing the liability of bank stockholders for the lost funds of their depositors, but the underlying problem was still ignored. A new crop of banks then sprang into existence and a new wave of speculative mania swept through the economy. By 1862, even though the law still limited bank notes to two times capital, the banks had created \$73,685,000 in total money, including checkbook money. This was supported by a base of only \$9,595,000 of specie, a reserve of only thirteen per cent. Massachusetts had not solved the problem.

PROPOSAL TO PROTECT DEPOSITS WITH A SAFETY FUND

The second theory about how to have stable banking and allow the banks to create money out of nothing was to create a "safety fund." This fund, supported by all the banks, would come to the aid of any member which needed an emergency loan to cover a

¹ L. Groseclose, *Money and Man*, pp. 188-89.

Federally insured to protect the banks by enslaving the people to pay for the \$ they created out of Nothing should banks fail

Not social
freedom

NEARER TO THE HEART'S DESIRE

Thus, the saga continues. After pouring billions of dollars into underdeveloped countries around the globe, no development has taken place. In fact, we have seen just the opposite. Most countries are worse off than before the Saviors of the World got to them.

SUMMARY

The IMF and the World Bank, were created at a meeting of global financiers and politicians held at Bretton Woods, New Hampshire, in 1944. Their announced goals were to facilitate international trade and to stabilize the exchange rates of national currencies. The unannounced goals were quite different. They were the elimination of the gold-exchange standard as the basis of currency valuation and the establishment of world socialism.

The method by which gold was to be eliminated in international trade was to replace it with a world currency which the IMF, acting as a world central bank, would create out of nothing. The method by which world socialism was to be established was to use the World Bank to transfer money—disguised as loans—to the governments of the underdeveloped countries and to do so in such a way as to insure the demise of free enterprise. The money was to be delivered from the hands of politicians and bureaucrats into the hands of other politicians and bureaucrats. When the money comes from government, goes to government, and is administered by government, the result will be the expansion of government.

The theoreticians who dominated the conference at Bretton Woods were the well-known Fabian Socialist from England, John Maynard Keynes and the Assistant Secretary of the U.S. Treasury, Harry Dexter White. White became the first Executive Director for the United States at the IMF.

The Fabians were an elite group of intellectuals who agreed with Communists as to the goal of socialism but disagreed over tactics. Whereas Communists advocated revolution by force and violence, Fabians advocated gradualism and the transformation of society through legislation.

It was learned in later years that Harry Dexter White was a Member of a Communist espionage ring. Thus, hidden from view, there was a complex drama taking place in which the two intellectual founders of the Bretton-Woods accords were a Fabian Socialist and a Communist, working together to bring about their mutual goal; world socialism.

World
currency
UNJUST
GAIN
out of Nothing
to enslave
Not care
for the
people

Can't
Case
who
Member
of people

Keynes
Bigger
with

Disguised as loans

They created money
stealing it requires you pay it back with interest.
You are reduced as a slave to artificial debt

168 THE CREATURE FROM JEKYLL ISLAND

pay back on an instant's notice. Instead, bankers put on great airs of respectability, stability, and accountability; dressed and acted serious if not stern; erected great edifices resembling government buildings and temples, all to bolster the false image of being able to honor their contracts to pay on demand.

It was John Maynard Keynes who observed:

A "sound" banker, alas! is not one who foresees danger, and avoids it, but one who, when he is ruined, is ruined in a conventional and orthodox way along with his fellows, so that no one can readily blame him. It is necessarily part of the business of a banker to maintain appearances, and to confess a conventional respectability, which is more than human. Life-long practices of this kind make them the most romantic and the least realistic of men.

CREATING MONEY OUT OF DEBT

Let us step back for a moment and analyze. In the beginning, banks served as warehouses for the safe keeping of their customers' coins. When they issued paper receipts for those coins, they converted commodity money into receipt money. This was a great convenience, but it did not alter the money supply. People had a choice of using either coin or paper but they could not use both. If they used coin, the receipt was never issued. If they used the receipt, the coin remained in the vault and did not circulate.

When the banks abandoned this practice and began to issue receipts to borrowers, they became magicians. Some have said they created money out of nothing, but that is not quite true. What they did was even more amazing. They created money out of debt.

Obviously, it is easier for people to go into debt than to mine gold. Consequently, money no longer was limited by the natural forces of supply and demand. From that point in history forward, it was to be limited only by the degree to which bankers have been able to push down the gold-reserve fraction of their deposits.

From this perspective, we can now look back on fractional money and recognize that it really is a transitional form between receipt money and fiat money. It has some of the characteristics of both. As the fraction becomes smaller, the less it resembles receipt money and the more closely it comes to fiat money. When the fraction finally reaches zero, then it has made the complete

They did create it
sell it by
enslaving you
to enrich
them in
something
they never
had.

1. As quoted by Lever and Huhne, *Debt and Danger: The World Financial Crisis* (New York: The Atlantic Monthly, 1986), p. 42.

I disagree and distinguish
my thoughts from the author's value
in enslaving others, sort of like
industrial products.

That's what
Be. The Folk R. did
creates money out of
nothing for a profit
for a profit

172 THE CREATURE FROM JEKYLLE ISLAND

The formula for honest banking had been found. The bank prospered and soon became the center of Venetian commerce. Its paper receipts were widely accepted far beyond the country's borders and, in fact, instead of being discounted in exchange for gold coin as was the usual practice, they actually carried a premium over coins. This was because there were so many kinds of coin in circulation and such a wide variance of quality within the same type of coin that one had to be an expert to evaluate their worth. The bank performed this service automatically when it took the coins into its vault. Each was evaluated, and the receipt given for it was an accurate reflection of its intrinsic worth. The public, therefore, was far more certain of the value of the paper receipts than of many of the coins and, consequently, was willing to exchange a little bit more for them.

Unfortunately, with the passage of time and the fading from memory of previous banking abuses, the Venetian Senate eventually succumbed to the temptation of credit. Strapped for funds and not willing to face the voters with a tax increase, the politicians decided they would authorize a new bank without restrictions against loans, have the bank create the money they needed, and then "borrow" it. So, in 1619, the *Banco del Giro* was formed, which, like its bankrupt predecessor, began immediately to create money out of nothing for the purpose of lending it to the government. Eighteen years later, the *Banco della Piazza del Rialto* was absorbed into the new bank, and history's first tiny flame of sound banking sputtered and died.

Throughout the fifteenth and sixteenth centuries, banks had been springing up all over Europe. Almost without exception, however, they followed the lucrative practice of lending money which was not truly available for loan. They created excess obligations against their reserves and, as a result, every one of them failed. That is not to say that their owners and directors did not prosper. It merely means that their depositors lost all or a part of their assets entrusted for safekeeping.

THE BANK OF AMSTERDAM

It wasn't until the Bank of Amsterdam was founded in 1609 that we find a second example of sound banking practices, and the results were virtually the same as previously experienced by the *Banco della Piazza del Rialto*. The bank only accepted deposits and

Money
out of
nothing

Swiss off shore accounts
no private tax. interest, so it
is safe from debt repay interest
loss of understanding

THE SECRET SCIENCE

steadfastly refused to make loans. Its income was derived solely from service fees. All payments in and around Amsterdam soon came to be made in paper currency issued by the bank and, in fact, that currency carried a premium over coin itself. The burgomasters and the city council were required to take an annual oath swearing that the coin reserve of the bank was intact. Galbraith reminds us:

Swiss
interest
France

For a century after its founding it functioned usefully and with notably strict rectitude. Deposits were deposits, and initially the metal remained in storage for the man who owned it until he transferred it to another. None was loaned out. In 1672, when the armies of Louis XIV approached Amsterdam, there was grave alarm. Merchants besieged the bank, some in the suspicion that their wealth might not be there. All who sought their money were paid, and when they found this to be so, they did not want payment. As was often to be observed in the future, however desperately people want their money from a bank, when they are assured they can get it, they no longer want it.¹

The principles of honesty and restraint were not to be long lived, however. The temptation of easy profit from money creation was simply too great. As early as 1657, individuals had been permitted to overdraw their accounts which means, of course, that the bank created new money out of their debt. In later years enormous loans were made to the Dutch East Indies Company. The truth finally became known to the public in January of 1790, and demands for a return of deposits were steady from that date forward. Ten months later, the bank was declared insolvent and was taken over by the City of Amsterdam.

1790
Gibb
before

THE BANK OF HAMBURG

The third and last experience with honest banking occurred in Germany with the Bank of Hamburg. For over two centuries it faithfully adhered to the principle of safe deposit. So scrupulous was its administration that, when Napoleon took possession of the bank in 1813, he found 7,506,956 marks in silver held against liabilities of 7,489,343. That was 17,613 more than was actually needed. Most of the bank's treasure that Napoleon hauled away was restored a few years later by the French government in the form of securities. It is not clear if the securities were of much value but, even if they were, they were not the same as silver. Because of foreign invasion, the bank's currency was no longer fully convert-

1. Galbraith, p. 16.

176 THE CREATURE FROM JEKYLL ISLAND

as "A conspiratorial group of plotters or intriguers." There is no other word that could so accurately describe this group. With much of the same secrecy and mystery that surrounded the meeting on Jekyll Island, the Cabal met in Mercer's Chapel in London and hammered out a seven-point plan which would serve their mutual purposes:

1. The government would grant a charter to the monetary scientists to form a bank;
2. The bank would be given a monopoly to issue banknotes which would circulate as England's paper currency;
3. The bank would create money out of nothing with only a fraction of its total currency backed by coin;
4. The monetary scientists then would loan the government all the money it needed;
5. The money created for government loans would be backed primarily by government I.O.U.s;
6. Although this money was to be created out of nothing and would cost nothing to create, the government would pay "interest" on it at the rate of 8%;
7. Government I.O.U.s would also be considered as "reserves" for creating additional loan money for private commerce. These loans also would earn interest. Thus, the monetary scientists would collect *double* interest on the same nothing.¹

The circular which was distributed to attract subscribers to the Bank's initial stock offering explained: "The Bank hath benefit of interest on all the moneys which it, the Bank, creates out of nothing."² The charter was issued in 1694, and a strange creature took its initial breath of life. It was the world's first central bank. Rothbard writes:

1. For an overview of these agreements, see Murray Rothbard, *The Mystery of Banking* (New York: Richardson & Snyder, 1983), p. 180. Also Martin Mayer, *The Bankers* (New York: Weybright & Talley, 1974), pp. 24-25.

2. Quoted by Carroll Quigley, *Tragedy and Hope: A History of the World in Our Time* (New York: Macmillan, 1966), p. 49. Paterson did not benefit from his own creation. He withdrew from the Bank over a policy disagreement within a few months after its formation and then returned to Scotland where he succeeded in selling his Darien scheme. Frugal Scots thronged to buy stock and to book passage to the fever-ridden land. The stock became worthless and almost all the 1200 colonists lost their lives.

Money out of Nothing

Can (an) can make money out of nothing? Love for people

Incentive government making gov. enslaved by evil sin of the lowest money printing out there for those they are charged to government make. They instead exploited use them to gain profit.

Same as now Unjust gain on the dollar plus interest out of nothingness



THE SECRET SCIENCE

In short, since there were not enough private savers willing to finance the deficit, Paterson and his group were graciously willing to buy government bonds, provided they could do so with newly-created out-of-thin-air bank notes carrying a raft of special privileges with them. This was a splendid deal for Paterson and company, and the government benefited from the flimflam of a seemingly legitimate bank's financing their debts.... As soon as the Bank of England was chartered in 1694, King William himself and various members of Parliament rushed to become shareholders of the new money factory they had just created.¹

THE SECRET SCIENCE OF MONEY

Both groups within the Cabal were handsomely rewarded for their efforts. The political scientists had been seeking about £500,000 to finance the current war. The Bank promptly gave them more than twice what they originally sought. The monetary scientists started with a pledged capital investment of £1,200,000. Textbooks tell us that this was lent to the government at 8% interest, but what is usually omitted is the fact that, at the time the loan was made, only £720,000 had been invested, which means the Bank "loaned" 66% more than it had on hand.² Furthermore, the Bank was given the privilege of creating at least an equal amount of money in the form of loans to the public. So, after lending their capital to the government, they still had it available to loan out a second time.

An honest loan of their £720,000 at 8% would have yielded £57,600 interest. But, with the new secret science, they were able to earn 8% on £1,200,000 given to the government plus an estimated 9% on £720,000 loaned to the public. That adds up to £160,800, more than 22% on their investment. The real point, however, is that, under these circumstances, it is meaningless to talk about a rate of interest. When money is created out of nothing, the true interest rate is not 8% or 9% or even 22%. It is infinity.

In this first official act of the world's first central bank can be seen the grand pretense that has characterized all those which have followed. The Bank pretended to make a loan but what it really did was to manufacture the money for government's use. If the government had done this directly, the fiat nature of the currency would

Rothbard, *Mystery*, p. 180.
2- See R.D. Richards, Ph.D., *The Early History of Banking in England* (New York-Augustus M. Kelley, original edition 1929, reprinted 1965), pp. 148-50.



The origin of the Bank of England which was set up by the King and the Queen to create money for the government.

The Gov should give gold coins to the people. Central bank should not be allowed to create money. Government should not have their hands on the money.

Almost everyone in government agreed with Ricardo's assessment, but, as is often the case, theoretical truth was fighting a losing battle against practical necessity. Men's opinions on the best form of money were one thing. The war with Napoleon was another, and it demanded a constant inflow of funding. England continued to use the central-bank mechanism to extract that revenue from the populace.

DEPRESSION AND REFORM

By 1815, prices had doubled again and then fell sharply. The Corn Act was passed that year to protect local growers from lower-priced imports. Then, when corn and wheat prices began to climb once more in spite of the fact that wages and other prices were falling, there was widespread discontent and rebellion. "By 1816," notes Roy Jastram, "England was in deep depression. There was stagnation of industry and trade generally; the iron and coal industries were paralyzed.... Riots occurred spasmodically from May through December."¹

In 1821, after the war had ended and there was no longer a need to fund military campaigns, the political pressure for a gold standard became too strong to resist, and the Bank of England returned to a convertibility of its notes into gold coin. The basic central-bank mechanism was not dismantled, however. It was merely limited by a new formula regarding the allowable fraction of reserves. The Bank continued to create money out of nothing for the purpose of lending and, within a year, the flower of a new business boom unfolded. Then, in November of 1825, the flower matured into its predestined fruit. The crisis began with the collapse of Sir Peter Cole and Company and was soon followed by the failure of sixty-three other banks. Fortunes were wiped out and the economy plunged back into depression.

When a similar crisis with still more bank failures struck again in 1839, Parliament attempted to come to grips with the problem. After five more years of analysis and debate, Sir Robert Peel succeeded in passing a banking reform act. It squarely faced the cause of England's booms and busts: an elastic money supply. What Peel's Bank Act of 1844 attempted to do was to limit the amount of money the banks could create to roughly the same as it would be if

Banks should
Bank NOT
COIN
END
PAIN

1- Roy W. Jastram, *The Golden Constant* (New York: Wiley, 1977), p. 113.

Some sense of the Great Depression
and Recession of 2008. Debtors help
the common man - their colleagues
better, however, the banks by diminishing
the credit. The gold standard
720 of 771

Creating money out of nothing
the U.S. to borrow and invest
on with taxes of the common man
Since the rich
pay nothing

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their banknotes were backed by gold or silver. It was a good try, but it ultimately failed because it fell short on three counts: (1) It was a political compromise and was not strict enough, allowing the banks to still create lending money out of nothing to the extent of £14,000,000; in other words, a "fractional" amount thought to be safe at the time; (2) The limitation applied only to paper currency issued by the Bank. It did not apply to checkbook money, and that was then becoming the preferred *form* of exchange. Consequently, the so-called reform did not even apply to the area where the greatest amount of abuse was taking place; and (3) The basic concept was allowed to remain unchallenged that *man*, in his infinite political wisdom, can determine what the money supply should be more effectively than an unmanaged system of gold or silver responding to the law of supply and demand.

THE ROLLER COASTER CONTINUES

Within three years of the "reform," England faced another crisis with still more bank failures and more losses to depositors. But when the Bank of England tottered on the edge of insolvency, once again the government intervened. In 1847, the Bank was exempted from the legal reserve requirements of the Peel Act. Such is the rock-steady dependability of man-made limits to the money supply.

Groseclose continues the story:

Ten years later, in 1857, another crisis occurred, due to excessive and unwise lending as a result of over-optimism regarding foreign trade prospects. The bank found itself in the same position as in 1847, and similar measures were taken. On this occasion the bank was forced to use the authority to increase its fiduciary [debt-based money] issue beyond the limit imposed by the Bank Charter Act....

Again in 1866, the growth of banking without sufficient attention to liquidity, and the use of bank credit to support a speculative craze...prepared the way for a crash which was finally precipitated by the failure of the famous house of Overend, Gurney and Co. The Act of 1844 was once more suspended....

In 1890, the Bank of England once again faced crisis, again the result of widespread and excessive speculation in foreign securities, particularly American and Argentine. This time it was the failure of Baring Brothers that precipitated the crash.

1. Groseclose, *Money and Man*, pp. 195-96.

THE MECHANISM SPREADS TO OTHER COUNTRIES

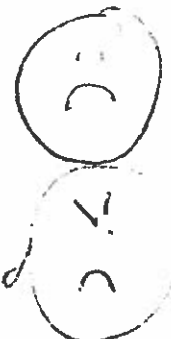
It is an incredible fact of history that, in spite of the general and recurring failures of the Bank of England during these years, the central-bank mechanism was so attractive to the political and monetary scientists that it became the model for all of Europe. The Bank of Prussia became the Reichsbank. Napoleon established the Banque de France. A few decades later, the concept became the venerated model for the Federal Reserve System. Who cares if the scheme is destructive? Here is the perfect tool for obtaining unlimited funding for politicians and endless profits for bankers. And, best of all, the little people who pay the bills for both groups have practically no idea what is being done to them.

SUMMARY

The business of banking began in Europe in the fourteenth century. Its function was to evaluate, exchange, and safeguard people's coins. In the beginning, there were notable examples of totally honest banks which operated with remarkable efficiency considering the vast variety of coinage they handled. They also issued paper receipts which were so dependable they freely circulated as money and cheated no one in the process. But there was a great demand for more money and more loans, and the temptation soon caused the bankers to seek easier paths. They began lending out pieces of paper that said they were receipts, but which in fact were counterfeit. The public could not tell one from the other and accepted both of them as money. From that point forward, the receipts in circulation exceeded the gold held in reserve, and the age of fractional-reserve banking had dawned. This led immediately to what would become an almost unbroken record from then to the present: a record of inflation, booms and busts, suspension of payments, bank failures, repudiation of currencies, and recurring spasms of economic chaos.

The Bank of England was formed in 1694 to institutionalize fractional-reserve banking. As the world's first central bank, it introduced the concept of a partnership between bankers and politicians. The politicians would receive spendable money (created out of nothing by the bankers) without having to raise taxes. In return, the bankers would receive a commission on the transaction—deceptively called interest—which would continue in perpetuity. Since it all seemed to be wrapped up in the mysterious rituals

Partnerships w/ politicians
Said nothing to
serve green not good



Case Review 5/11/21
Pics of the Fed
The common man had
the bank of the future
bankers stock were
nothing but credit
debts
banking
profits
will lose
all of
the gov
does not
step it with
just leads
to
just
profits

Chapter Ten

THE MANDRAKE MECHANISM

The method by which the Federal Reserve creates money out of nothing; the concept of usury as the payment of interest on pretended loans; the true cause of the hidden tax called inflation; the way in which the Fed creates boom-bust cycles.

In the 1940s, there was a comic strip character called Mandrake the Magician. His specialty was creating things out of nothing and, when appropriate, to make them disappear back into that same void. It is fitting, therefore, that the process to be described in this section should be named in his honor.

In the previous chapters, we examined the technique developed by the political and monetary scientists to create money out of nothing for the purpose of lending. This is not an entirely accurate description because it implies that money is created first and then waits for someone to borrow it. On the other hand, textbooks on banking often state that money is created out of debt. This also is misleading because it implies that debt exists first and then is converted into money. In truth, money is not created until the instant it is borrowed. It is the act of borrowing which causes it to spring into existence. And, incidentally, it is the act of paying off the debt that causes it to vanish.¹ There is no short phrase that perfectly describes that process. So, until one is invented along the way, we shall continue using the phrase "create money out of nothing" and occasionally add "for the purpose of lending" where necessary to further clarify the meaning.

i- Printed Federal Reserve Notes that sit in the Treasury's vault do not become money until they are released into circulation in exchange for checkbook money that was created by a bank loan. As long as the bills are in the vault with no debt-based money to replace them, they technically are just paper, not money.

\$ created out of nothing by
bankers dreamed up just profit

~~Jefferson~~
~~The structure of money lending~~

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When banks place credits into your checking account, they are merely pretending to lend you money. In reality, they have nothing to lend. Even the money that non-indebted depositors have placed with them was originally created out of nothing in response to someone else's loan. So what entitles the banks to collect rent on nothing? It is immaterial that men everywhere are forced by law to accept these nothing certificates in exchange for real goods and services. We are talking here, not about what is legal, but what is moral. As Thomas Jefferson observed at the time of his protracted battle against central banking in the United States, "No one has a natural right to the trade of money lender, but he who has money to lend."¹

Usury
is not
legal
but
moral

~~_____~~

THIRD REASON TO ABOLISH THE SYSTEM

Centuries ago, *usury* was defined as any interest charged for a loan. Modern usage has redefined it as *excessive* interest. Certainly, any amount of interest charged for a *pretended* loan is excessive. The dictionary, therefore, needs a new definition. *Usury: The charging of any interest on a loan of fiat money.*

Let us, therefore, look at debt and interest in this light. Thomas Edison summed up the immorality of the system when he said:

People who will not turn a shovel full of dirt on the project nor contribute a pound of materials will collect more money...than will the people who will supply all the materials and do all the work.

Is that an exaggeration? Let us consider the purchase of a \$100,000 home in which \$30,000 represents the cost of the land, architect's fee, sales commissions, building permits, and that sort of thing and \$70,000 is the cost of labor and building materials. If the home buyer puts up \$30,000 as a down payment, then \$70,000 must be borrowed. If the loan is issued at 11% over a 30-year period, the amount of interest paid will be \$167,806. That means the amount paid to those who loan the money is about 2 1/2 times greater than

1. *The Writings of Thomas Jefferson, Library Edition* (Washington: Jefferson Memorial Association, 1903), Vol XIII, p. 277-78.
2. As quoted by Brian L. Bex, *The Hidden Hand* (Spencer, Indiana: Owen Litho, 1975), p. 161. Unfortunately, Edison did not understand the whole problem. He was correctly opposed to paying interest to banks for their fiat money, but he was not opposed to government fiat money. It was only the interest to which he objected. He did not see the larger picture of how fiat money, even when issued solely by the government and without interest, has always been destructive of the economy through the creation of inflation, booms, and busts.

THE MANDRAKE MECHANISM

paid to those who provide all the labor and all the materials. It is true that this figure represents the time-value of that money over thirty years and easily could be justified on the basis that a lender deserves to be compensated for surrendering the use of his capital for half a lifetime. But that assumes the lender actually had something to surrender, that he had earned the capital, saved it, and then loaned it for construction of someone else's house. What are we to think, however, about a lender who did nothing to earn the money, had not saved it, and, in fact, simply created it out of thin air? What is the time-value of nothing?

As we have already shown, every dollar that exists today, either in the form of currency, checkbook money, or even credit card money—in other words, our *entire* money supply—exists only because it was borrowed by someone; perhaps not you, but *someone*. That means all the American dollars in the entire world are earning daily and compounded interest for the banks which created them. A portion of every business venture, every investment, every profit, every transaction which involves money—and that even includes losses and the payment of taxes—a portion of all that is earmarked as payment to a bank. And what did the banks do to earn this perpetually flowing river of wealth? Did they lend out their own capital obtained through the investment of stockholders? Did they lend out the hard-earned savings of their depositors? No, neither of these were their major source of income. They simply waved the magic wand called fiat money.

The flow of such unearned wealth under the guise of interest can only be viewed as usury of the highest magnitude. Even if there were no other reasons to abolish the Fed, the fact that it is the supreme instrument of usury would be more than sufficient by itself.

WHO CREATES THE MONEY TO PAY THE INTEREST?

One of the most perplexing questions associated with this process is "Where does the money come from to pay the interest?" If you borrow \$10,000 from a bank at 9%, you owe \$10,900. But the bank only manufactures \$10,000 for the loan. It would seem, therefore, that there is no way that you—and all others with similar loans—can possibly pay off your indebtedness. The amount of money put into circulation just isn't enough to cover the total debt, including interest. This has led some to the conclusion that it is necessary for you to borrow the \$900 for the interest, and that, in turn, leads to still

Rentier
Money
Bank
Interest
Evil
Deception

Money in circulation does not exist to pay interest

THE MANDRAKE MECHANISM

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magicians create the illusion of modern money. First we shall stand back for a general view to see the overall action. Then we shall move in closer and examine each component in detail.

THE MANDRAKE MECHANISM: AN OVERVIEW

DEBT

The entire function of this machine is to convert debt into money. It's just that simple. First, the Fed takes all the government bonds which the public does not buy and writes a check to Congress in exchange for them. (It acquires other debt obligations as well, but government bonds comprise most of its inventory.) There is no money to back up this check. These fiat dollars are created on the spot for that purpose. By calling those bonds "reserves," the Fed then uses them as the base for creating 9 additional dollars for every dollar created for the bonds themselves. The money created for the bonds is spent by the government, whereas the money created on top of those bonds is the source of all the bank loans made to the nation's businesses and individuals. The result of this process is the same as creating money on a printing press, but the illusion is based on an accounting trick rather than a printing trick. The bottom line is that Congress and the banking cartel have entered into a partnership in which the cartel has the privilege of collecting interest on money which it creates out of nothing, a perpetual override on every American dollar that exists in the world. Congress, on the other hand, has access to unlimited funding without having to tell the voters their taxes are being raised through the process of inflation. If you understand this paragraph, you understand the Federal Reserve System.

MONEY

Now for a more detailed view. There are three general ways in which the Federal Reserve creates fiat money out of debt. One is by making loans to the member banks through what is called the *Discount Window*. The second is by purchasing Treasury bonds and

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generates our most unfair tax. Both the tax and the System that makes it possible should be abolished.

The political scientists who authorize this process of monetizing the national debt, and the monetary scientists who carry it out, know that it is not true debt. It is not true debt, because no one in Washington really expects to repay it—ever. The dual purpose of this magic show is simply to create free spending money for the politicians, without the inconvenience of raising direct taxes, and also to generate a perpetual river of gold flowing into the banking cartel. The partnership is merely looking out for itself.

Why, then, does the federal government bother with taxes at all? Why not just operate on monetized debt? The answer is twofold. First, if it did, people would begin to wonder about the source of the money, and that might cause them to wake up to the reality that inflation is a tax. Thus, open taxes at some level serve to perpetuate public ignorance which is essential to the success of the scheme. The second reason is that taxes, particularly progressive taxes, are weapons by which elitist social planners can wage war on the middle class.

A TOOL FOR SOCIAL PLANNING

The January 1946 issue of *American Affairs* carried an article written by Beardsley Ruml who, at that time, was Chairman of the Federal Reserve Bank of New York. Ruml had devised the system of automatic withholding during World War II, so he was well qualified to speak on the nature and purpose of the federal income tax. His theme was spelled out in the title of his article: "Taxes for Revenue Are Obsolete."

In an introduction to the article, the magazine's editor summarized Ruml's views as follows:

His thesis is that, given control of a central banking system and an inconvertible currency [a currency not backed by gold], a sovereign national government is finally free of money worries and needs no longer levy taxes for the purpose of providing itself with revenue. All taxation, therefore, should be regarded from the point of view of social and economic consequences.¹

Ruml explained that, since the Federal Reserve now can create out of nothing all the money the government could ever want, there

1. "Taxes for Revenue Are Obsolete," by Beardsley Ruml, *American Affairs*, January, 1946, p. 35.

making people to pay tax on the banks profit as the people's government

THE MANDRAKE MECHANISM

economically destroyed by it. Furthermore, there is nothing in our present monetary structure that offers any assurance that we may be exempted from that morbid roll call.

Correction. There is *one*. It is still within the power of Congress to abolish the Federal Reserve System.

SUMMARY

The American dollar has no intrinsic value. It is a classic example of fiat money with no limit to the quantity that can be produced. Its primary value lies in the willingness of people to accept it and, to that end, legal tender laws require them to do so. It is true that our money is created out of nothing, but it is more accurate to say that it is based upon debt. In one sense, therefore, our money is created out of less than nothing. The entire money supply would vanish into bank vaults and computer chips if all debts were repaid. Under the present System, therefore, our leaders cannot allow a serious reduction in either the national or consumer debt. Charging interest on pretended loans is usury, and that has become institutionalized under the Federal Reserve System. The Mandrake Mechanism by which the Fed converts debt into money may seem complicated at first, but it is simple if one remembers that the process is not intended to be logical but to confuse and deceive. The end product of the Mechanism is artificial expansion of the money supply, which is the root cause of the hidden tax called inflation. This expansion then leads to contraction and, together, they produce the destructive boom-bust cycle that has plagued mankind throughout history wherever fiat money has existed.

Created out of nothing
to serve greed of Fed Res.
Not good
Gov should coin \$ w/o
debt & care for the
people and fully fund
gov. not enslave people
artificially increase gov
back

Chapter Eleven

THE ROTHSCHILD FORMULA

The rise of the House of Rothschild in Europe; the tradition among financiers of profiting from both sides of armed conflict; the formula by which war is converted into debt and debt converted back into war.

So far we have adhered closely to the subject of money and the history of its manipulation by political and monetary scientists. Now we are going to take a short detour along a parallel path and view some of the same historical scenery from a different perspective. As we progress, it may seem that we have lost our way, and you may wonder what connection any of this can possibly have with the Federal Reserve System. Please be assured, however, it has *everything* to do with it, and, when we finally return to that topic, the connection will have become painfully clear.

THE PROFITS OF WAR

The focus of this chapter is on the profits of war and, more specifically, the tendency of those who reap those profits to manipulate governments into military conflicts, not for national or patriotic reasons, but for private gain. The mechanism by which this was accomplished in the past was more complex than simply lending money to warring governments and then collecting interest, although that was part of it. The real payoff has always been in the form of political favoritism in the market place. Writing in the year 1937, French historian Richard Lewinsohn explains:

Although often called bankers, those who financed wars in the pre-capitalist period ... were not bankers in the modern sense of the word. Unlike modern bankers who operate with money deposited with them by their clients [or, in more recent times, created out of nothing by a central bank—E.G.], they generally worked with the fortune which they themselves had amassed or inherited, and which

\$ out of Nothing

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there were definite limits to how far that process could go. Bank notes were not forced on the people as legal tender for all debts, public and private, but the government did agree to accept them *at their face value* in payment of all taxes and duties, which made them as good as gold for that specific purpose. Furthermore, unlike the central banks of today, the Bank of North America was not given the power to directly issue the nation's money.

FUNCTIONED AS A CENTRAL BANK

On the other hand, the Bank was given the right of monopoly in its field, which means there were no other bank notes allowed to circulate in competition. This, plus the fact that they were accepted at face value in payment of all federal and state taxes, plus the further fact that the federal government did not at that time have a functioning money of its own, made these bank notes attractive for use as a circulating medium of exchange. The intended result was that the Bank's paper would be accepted as money, which for a while, it was. Furthermore, the Bank was made the official depository for all federal funds and it almost immediately loaned \$12 million to the government, much of which was created out of nothing for that purpose. So, in spite of the limitations placed upon the Bank, and in spite of the fact that it was essentially a private institution, it was intended to be and, in fact, did function as a central bank.

The Bank of North America was fraudulent from the very start. The charter required that private investors provide \$400,000 for the initial subscription. When Morris was unable to raise that money, he used his political influence to make up the shortfall out of government funds. In a maneuver that was nothing less than legitimized embezzlement, he took the gold that had been loaned to the United States from France and had it deposited in the Bank. Then, using this as a fractional-reserve base, he simply created the money that was needed for the subscription and loaned it to himself and his associates. Such is the power of the secret science.

It is hard to reconcile the fact that the same men who adopted the brilliant monetary restraints of the Constitution a few years later would have allowed the Bank of North America to exist. It must be remembered, however, that the war was still in progress

1. See Murray N. Rothbard, *Conceived in Liberty: The Revolutionary War, 1775-1784* (New Rochelle, New York: Arlington House, 1979), Vol. IV, p. 392.

gov funds
o
created money

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when the charter was issued, and even the wisest of statesmen are often obliged to follow expediency in such times. One also must conclude that, while the founding fathers were wise on the nature of fiat money created by the government's printing press, they had not yet had extensive experience with the same mechanism hidden behind the obscurities of fractional-reserve banking.

In any event, the Bank was not to have its charter renewed by Congress and it did not survive beyond the end of the war. Murray Rothbard details its demise:

Despite the monopoly privileges conferred upon the Bank of North America and its nominal redeemability in specie, the market's lack of confidence in the inflated notes led to their depreciation outside the Bank's home base in Philadelphia. The Bank even tried to bolster the value of its notes by hiring people to urge redeemers of its notes not to insist on specie—a move scarcely calculated to improve the long-run confidence in the Bank.

After a year of operation, Morris's political power slipped, and he moved quickly to shift the Bank of North America from a central bank to a purely commercial bank chartered by the state of Pennsylvania. By the end of 1783,... the first experiment with a central bank in the United States had ended.¹

A fitting epilogue to this story was written two hundred years later when, in 1980, the First Pennsylvania Bank of Philadelphia, the "oldest bank in the nation," was bailed out by the FDIC.

AN END RUN AROUND THE CONSTITUTION

It will be recalled that, after the Bank of North America was terminated and after the Constitutional Convention "closed the door on paper money," the United States enjoyed a period of unparalleled economic growth and prosperity. But, while the door may have been closed, the window was still open. Congress was denied the power to *print* money, but it was not denied the power to *borrow* it.

In the vocabulary of the common man, to borrow is to accept a loan of something that already exists. He is confused, therefore, when the banker issues money out of nothing and then says he is *lending* it. He *appears* to be lending but, in reality, he is *creating*.

Then, as now, the mysteries of banking vocabulary were not revealed to the average man, and it was difficult to understand

1- Rothbard, *Mystery*, pp. 194-95.

money out of nothing

Banks
Not gov.
gain \$ credit

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I

how privately-issued bank notes could serve precisely the same purpose as printing-press money—with precisely the same disastrous results. That being the case, the monetary and political scientists decided to end run the Constitution. Their plan was to establish a bank, to give that bank the power to create money, to *lend* most of that money to the government, and then to make sure the IOUs are accepted as money by the public. Congress, therefore, would not be emitting bills of credit. ~~The bank would do that.~~

Thus, the First Bank of the United States was conceived.

The proposal was submitted to Congress in 1790 by Alexander Hamilton who, at that time, was Secretary of the Treasury. Hamilton, incidentally, was a former aide to Robert Morris, founder of the Bank of North America, so in that sense his role in this matter is not surprising. What is surprising is the fact that Hamilton had been a staunch supporter of a sound currency during the Constitutional Convention. This is hard to reconcile, and one must suspect that, even the most well intentioned of men can become corrupted by the temptations of wealth and power. It is possible that Hamilton, Morris, and other Federalist leaders had hoped to keep the government out of the money-making business, not because it was the constitutional thing to do, but because that would leave the field clear for a central-bank mechanism which, because it was further from public view and political control, could become their own private engine of profit. It would appear that the only other explanation is that these men were fickle in their views and did not really understand the implications of their acts. In view of their brilliance in all other matters, however, it is difficult to muster enthusiasm for that interpretation.

THE HAMILTON-JEFFERSON CONFLICT

Hamilton's proposal was strongly opposed by Thomas Jefferson, then Secretary of State, and this was the beginning of a heated political debate that would preoccupy Congress for many decades to come. In fact, it was one of the central issues that led to the creation of our first political parties. The Federalists gathered around the ideas of Hamilton. The anti-Federalists, later called the Republicans, were attracted to the ideas of Jefferson.¹

1. Curiously, the present Democratic Party traces its origin to Jefferson's Republicans.

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Another possible solution would be to redefine the new dollar to contain a smaller quantity of silver. The advantage would be that we could continue to use our present coinage. On the negative side, however, is the fact that it would create headaches *after* the transition, because coinage then would be too cheap. Instead of changing over *now*, we would merely be postponing the task for *later*. Now is the time to do it—and do it right. The original value of a silver dollar was determined after centuries of trial and error. We don't have to reinvent the wheel. We *know* that it will work in the long run.

In the past, the banks have enjoyed a bountiful cash flow from interest on money created out of nothing. That will change. They will have to make a clear distinction between demand deposits and time deposits. Customers will be informed that, if they want the privilege of receiving their money back *on demand*, their deposit of coins or Treasury Certificates will be kept in the vault and not loaned to others. Therefore, it will not earn interest for the bank. If the bank cannot make money on the deposit, then it must charge the depositor a fee for safeguarding his money and for checking services. If the customer wants to earn interest on his deposit, then he will be informed that it will be invested or loaned out, in which case he cannot expect to get it back any time he wants. He will knowingly put his money into a *time* deposit with the agreement that a specified amount of time must pass before the investment matures.

The effect of this practice on banking will be enormous. Banks will have to pay higher interest rates to attract investment capital. They will have to trim their overhead expenses and eliminate some of the plush. Profit margins will be tightened. Efficiency will improve. They used to offer "free" services which actually were paid out of interest earned on their customers' demand deposits. Now they will charge for those services, such as checking and safe storage of deposits. Customers probably will grumble at first at having to pay for those things, and there will be no more free toasters.

Electronic transfer systems will probably become popular for their convenience, but they will be optional. Cash and check transactions will continue to play an important role. Government monitoring will be illegal. Although there will be fewer dollars in circulation than there were Federal Reserve Notes, the value of

← NO

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his 1963 address at the IMF, the outflow of American gold "did not come about by chance."¹

THE "DISCOVERY" OF THE OPEN MARKET

It is commonly asserted by writers on this topic that the power of the open-market mechanism to manipulate the money supply was "discovered" by the Fed in the early 1920s and that it came as a total surprise. Martin Mayer, for example, in his book, *The Bankers*, writes:

Now, through an accident as startling as those which produced the discovery of X-Rays or penicillin, the central bank learned that "open market operations" could have a significant effect on the behavior of the banks.²

This makes the story interesting, but it is difficult to believe that Benjamin Strong, Paul Warburg, Montagu Norman, and the other monetary scientists who were pulling the levers at that time were taken by surprise. These men could not possibly have been ignorant of the effect of creating money out of nothing and pouring it into the economy. The open market was merely a different funnel. If there was any element of surprise, it likely was only in the ease with which the mechanism could be activated. It is not important whether that part of the story is fact or fiction, except that it perpetuates the "accidental" view of history, the myth that no one is responsible for political or economic chaos: Things just happen. There was no master plan. No one is to blame. Everything is under control. Relax, pay your taxes, and go back to sleep!

In any event, by the end of the war, Congress had awakened to the fact that it could use the Federal Reserve System to obtain revenue without taxes. From that point forward, deficit spending became institutionalized. A gradually increasing issuance of Treasury bonds was encouraging to the Fed because it provided still one more source of debt to convert into money, a source that eventually would become far more reliable than either bank loans or banker's acceptances. Best of all, now that Congress was becoming dependent on the free corn, there was little chance it would find its wings and fly away. The more dependent it became, the more secure the System itself became.

1. See Chapter six.
2. Mayer, p. 401.

Appendix NN

MEGHAN MARIE KELLY

34012 Shawnee Drive
Dagsboro, DE 19939

Justices of the DE Supreme Court
c/the Clerk of Court
55 The Green
Dover, DE 19901

RE: No. 22-58 Meghan Kelly: Federal Reserve

August 29, 2022

Dear Honorable Court:

The State filed a petition against me for inter alias my political-religious beliefs contained in my RFRA petition to dissolve the establishment of government religious under former President Donald J. Trump. My political proposals and ideas are in issue. Even bad ideas are protected. If we cannot share our ideas than we cannot learn they are bad to improve.

I believe this court may reverse or prevent a crash. If this courts think my ideas are bad, at least I can face God on judgment day. I know I tried to do what I believed was right, by humbling myself before you, asking you to please consider saving the world. The Courts are my hope of a hero, even if this Court is mad at me for my religious-political petitions containing speech reflecting my genuinely held religious beliefs.

The way money is coined is the problem. In 1913, President Wilson signed the Federal Reserve Act, which created the Federal Reserve. The Federal Reserve is a private corporation, containing banks as shareholders.¹ The employees of the

¹ *Hubbard v. Fed. Rsr. Bank of Atlanta*, No. CIV.A. 96-2354, 1996 WL 551496, at *1 (E.D. La. Sept. 26, 1996) (“Federal Reserve Banks are independent corporations owned by commercial banks in their geographic regions”); *Id.* (“While the Federal Reserve Board regulates the Reserve Banks, direct supervision and control of each Bank is exercised by its board of directors. 12 U.S.C. § 301. Each Reserve Bank is statutorily empowered to conduct its activities **without day-to-day direction from the federal government.**”); *Lewis v. United States*, 680 F.2d 1239 (9th Cir. 1982) (“Federal reserve banks are **not federal instrumentalities** for purposes of a Federal Tort Claims Act, but are **independent, privately owned and locally controlled corporations** in light of fact that direct supervision and control of each bank is exercised by board of directors, federal reserve banks, though heavily regulated, are **locally controlled by their member banks, banks are listed neither as “wholly owned” government corporations nor as “mixed ownership” corporations**; federal reserve banks receive no appropriated funds from Congress and the banks are empowered to sue and be sued in their own names.” 28 U.S.C.A. §§ 1346(b), 2671 et seq.; *Federal Reserve Act*, §§ 4, 10(a, b), 13, 13a, 13b, 14, 14(a–g), 16, 12 U.S.C.A. §§ 301, 341–360; 12 U.S.C.A. § 361; *Government Corporation Control Act*, §§ 101, 201, 31 U.S.C.A. §§ 846, 856.)); *Schaffer v. Pub. Emps. Ret. Sys.*, 21 Ohio St. 3d 86, 91, 488 N.E.2d 162, 165 (1986) (“Dissent, In *Lewis v. United States* (C.A. 9, 1982), 680 F.2d 1239, and *Arney v. United States* (Dec. 4, 1979), D.Tenn.No. 77–3503–NA–CV, unreported, the courts held that federal reserve banks were **not federal agents** for purposes of the Federal Tort Claims Act, Section 1346(b), Title 28, U.S. Code. Both courts noted that Congress structured the reserve banks as **corporate entities owned by commercial banks** ‘under the supervision and control’ of their own boards of directors and subject only to general supervision by the Board of Governors of the Federal Reserve System. See Sections 301 and 248(j), Title 12, U.S. Code. Both the *Lewis* and *Arney* courts thoroughly analyzed the operation and the legislative history of the Federal Reserve Act and found, among other things, that the federal government had no financial involvement in the banks, the banks were **independent corporations**, the banks primarily serviced **private business** and

Federal Reserve appear to gain the benefits of federal employees, such as retirement, while not being subjected to the liability in the form of federal limits.²

financial entities, and the federal government did not control the daily operation of the banks.

These courts also found that **federal reserve bank employees were not subject to federal governmental control**. The bank had the right to hire and fire its employees. The employees did not participate in the civil service retirement system or the federal workers' compensation programs, they were not subject to federal travel regulations, and they did not receive governmental employees discounts. The Federal Reserve Act reflects the Congressional intent that federal reserve banks remain non-governmental entities. Although federal reserve bank policy with respect to interest rates and the like remains under the general supervision of the federal reserve board, the banks are private entities separate and distinct from the government.

The drafters of the Federal Reserve Act made clear the private function of federal reserve banks:

'The Federal reserve banks * * * would be in effect cooperative institutions, carried on **for the benefit of the community and of the banks themselves by the banks acting as stockholders therein.** * * * The committee, however, recommends that they shall be individually organized and individually controlled, each holding the fluid funds of the region in which it is organized and each ordinarily dependent upon no other part of the country for assistance. The only factor of centralization which has been provided in the committee's plan is found in the Federal reserve board, which is to be a strictly Government organization created for the purpose of inspecting existing banking institutions and of regulating relationships between Federal reserve banks and between them and the government itself.' H.R.Rep. No. 69, 63rd Cong., 1st Sess. (1913), 17-18.")

² *Lewis v. United States*, 680 F.2d 1239 (9th Cir. 1982), ("The Reserve Banks are deemed to be federal instrumentalities for purposes of immunity from state taxation.")

Schaffer v. Pub. Emps. Ret. Sys., 21 Ohio St. 3d 86, 488 N.E.2d 162 (1986) ("The Supreme Court held that federal reserve bank is "governmental entity 'operated by'" United States Government so as to **qualify for credit within Public Employees Retirement System**"); [This does not seem fair that they get federal retirement benefits without oversight or Constitutional limits as a nonfederal instrumentality.] *See also, Farm Credit of Nw. Fla., ACA v. Easom Peanut Co.*,

An agent of the Federal Reserve banks makes at least one request, per year for the government to issue money, called federal reserve notes. The Federal Reserve may require additional requests for emergencies such as the emergency related to hurricane Katrina.

Federal Reserve Notes are the only type of currency circulating in the US. Please see the Exhibit A attached hereto, which contains a dollar bill, a five dollar bill, a ten dollar bill and a twenty dollar bill.

On the front of each bill, you see the label Federal Reserve Note. The government issues money, called federal reserve notes and gives them to the Federal Reserve for use by its bank members, while increasing debts of the government to enslave a no longer free people to pay back the free lunch for the bank's members' gain.

The notes are backed by financial assets that the Federal Reserve Banks pledge as collateral, which are not actually owned by the banks under fractional

312 Ga. App. 374, 384–85, 718 S.E.2d 590, 602 (2011) (Holding this bank entity was immune from suit as a government instrumentality, which makes banks above the law); *But See, McGee v. Tucoemas Fed. Credit Union*, 153 Cal. App. 4th 1351, 63 Cal. Rptr. 3d 808 (2007) (This Court holds the banks waive immunity); *Rheams v. Bankston, Wright & Greenhill*, 756 F. Supp. 1004 (W.D. Tex. 1991) (“Federal Home Loan Bank of Dallas was not a “federal agency” within meaning of Federal Tort Claims Act and its employees were not employees of government for purposes of removing case to federal court. 28 U.S.C.A. §§ 1346(b), 2671.”).

reserves. The notes are backed by other people's assets, which I believe is the definition of a Ponzi scheme. The notes are mainly backed by Treasury securities and mortgage agency securities that the banks purchase on the open market by fiat payment using other people's money as their own through fractional reserve banking theories.

This would likely jeopardize people's land and homes, should an economic crash occur, to serve the greed of banks and profiteering private and foreign entities, not the welfare of the people or this nation.

I am concerned this may cause a foreclosure crisis, leaving many homeless, if the court does not consider the welfare of the people more important than debt control, and power money grants to those who have it by unjust gains to buy influence.

The Federal reserve should not be charged with controlling the currency. The government must take back its coining power to care for the people while protecting individual liberty, not controlling the people, through money by indebtedness and grants to entities as opposed to individuals in need.

The shareholding banks have incentive to make America and the people worse off. Banks gain more profit on debt interest, the worse off, and the more debt America and Americans are in.

The wars we wage, are never for freedom, but enslave the people to pay back the debt and debt on interest to the banks, the Federal Reserve gains through military spending, while enriching businesses who make money off of the artificially created need to serve greed under the guise of liberty.

There is a movement by global leaders to eliminate war, under the lie of peace, which is created by the elimination of freedom by government backed private and foreign control.

I prefer the discord the liberty to think, believe, associate, worship, requires in order to safeguard Constitutional rights, than the wicked peace the global leaders appear to seek. As a Christian, I follow Jesus who teaches me, not to come for peace, but come to cut off lawlessness stemmed in lusts that destroys people in this life and damns people in hell by justice in the courts, not productivity to serve the lawlessness of Satan, business greed. *Matthew* 10:34, 23:23.

Those who preach “order” serve lawless lusts. They do not serve Constitutional law by upholding liberties from government backed private or foreign control of the peoples substantially burdened will. I believe this not only leads to harm in this life but damnation in hell, without court correction.

Per the attached Exhibit B, there are global plans to create more waste, to create more debt, to gain more profit on debt for banks, and artificial need to serve

business greed, under the pretty name of science, to maintain debt control over the world.

People are literally coming up with deceptive theories to kill, steal and destroy and harm humanity to maintain power, profit and position.

The excerpts in the book attached hereto talks about intentionally making people sick by the food and water to control population or otherwise, creating a space race to create waste, to create waste by nuclear arms checks or nuclear races, creating race wars, and other evil.

There literally is reward for harming humanity under the lie of helping it.

I have a number of legal theories to prevent this economic crash, while preventing harm to humanity. Opposing counsel opposed my desire to draft a motion on this awhile back.

I do not have time to draft a letter outlining my legal theories for this Court. A letter may save the court time, should I bring a mistrial against *Kelly v Trump* espousing theories this Court may reject or require additional information to consider.

I would like an opportunity to be heard in the reciprocal cases. I must focus on the reciprocal law suits that require a more immediate or urgent response as opposed to this Court.

I must not be denied opportunities to be heard in other forums, by taking time now in this forum, time I do not have to spend, without sacrificing justice elsewhere.

Thank you for your time and consideration of this important matter. I apologize to this Court should I fail to outline how this Court may save the world, even if you seek to destroy mine.

My hope remains in the courts.

August 29, 2022

Respectfully Submitted,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
302-493-6693
Bar No 4968 DEACTIVE(119 words)

Internal
Exhibit A



Internal Exhibit
Exhibit B

REPORT FROM IRON MOUNTAIN

On the Possibility & Desirability of Peace



SUPPRESSED
THIS REPORT/DOCUMENT/SATIRE IS SUBJECT TO THE
HIGHEST SECURITY CLASSIFICATION AND ACCESS TO
IT OR CONFIRMATION OF ITS EXISTENCE IS LIMITED
TO PERSONS CLEARED BY CONTINGENCY EVALUATION
COMMITTEE. THIS ORDER IS ABSOLUTE UP TO AND
INCLUDING PRESIDENTIAL LEVEL

LEONARD C. LEWIN

With a new introduction by Victor Navasky and an appendix
on the "Iron Mountain Affair"

SECTION 6

SUBSTITUTES FOR
THE FUNCTIONS OF WAR

BY NOW IT SHOULD BE CLEAR that the most detailed and comprehensive master plan for a transition to world peace will remain academic if it fails to deal forthrightly with the problem of the critical nonmilitary functions of war. The social needs they serve are essential; if the war system no longer exists to meet them, substitute institutions will have to be established for the purpose. These surrogates must be "realistic," which is to say of a scope and nature that can be conceived and implemented in the context of present-day social capabilities. This is not the truism it may appear to be; the requirements of radical social change often reveal the distinction between a most conservative projection and a wildly utopian scheme to be fine indeed.

In this section we will consider some possible substitutes for these functions. Only in rare instances have they been put forth for the purposes which concern us here, but we see no reason to limit ourselves to proposals that address themselves explicitly to the problem as we have outlined it. We will disregard the ostensible, or military, functions of war; it is a premise of this study that the transition to peace implies absolutely that they will no longer exist in any relevant sense. We will also disregard the non-critical functions exemplified at the end of the preceding section.

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Economic

Economic surrogates for war must meet two principal criteria. They must be "wasteful" in the common sense of the word, and they must operate outside the normal supply-demand system. A corollary that should be obvious is that the magnitude of the waste must be sufficient to meet the needs of a particular society. An economy as advanced and complex as our own requires the planned average annual destruction of not less than 10 percent of gross national product¹ if it is effectively to fulfill its stabilizing function. When the mass of a balance wheel is inadequate to the power it is intended to control, its effect can be self-defeating, as with a runaway locomotive. The analogy, though crude,² is especially apt for the American economy, as our record of cyclical depressions shows. All have taken place during periods of grossly inadequate military spending.

Those few economic conversion programs which by implication acknowledge the nonmilitary economic function of war (at least to some extent) tend to assume that so-called social-welfare expenditures will fill the vacuum created by the disappearance of military spending. When one considers the backlog of unfinished business—proposed but still unexecuted—in this field, the assumption seems plausible. Let us examine briefly the following list, which is more or less typical of general social-welfare programs.³

Health. Drastic expansion of medical research, education, and training facilities; hospital and clinic construction; the general objective of *complete* government-guaranteed health care for all, at a level consistent with current developments in medical technology.

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replacement for war purposes

SUBSTITUTES FOR THE FUNCTIONS OF WAR 75

standards, with the general objective of making available for all an attainable educational goal equivalent to what is now considered a professional degree.

Housing. Clean, comfortable, safe, and spacious living space for all, at the level now enjoyed by about 15 percent of the population in this country (less in most others).

Transportation. The establishment of a system of mass public transportation making it possible for all to travel to and from areas of work and recreation quickly, comfortably, and conveniently, and to travel privately for pleasure rather than necessity.

Physical environment. The development and protection of water supplies, forests, parks, and other natural resources; the elimination of chemical and bacterial contaminants from air, water, and soil.

Poverty. The genuine elimination of poverty, defined by a standard consistent with current economic productivity, by means of a guaranteed annual income or whatever system of distribution will best assure its achievement.

This is only a sampler of the more obvious domestic social welfare items, and we have listed it in a deliberately broad, perhaps extravagant, manner. In the past, such a vague and ambitious-sounding "program" would have been dismissed out of hand, without serious consideration; it would clearly have been, *prima facie*, far too costly, quite apart from its political implications.⁴ Our objection to it, on the other hand, could hardly be more contradictory. As an economic substitute for war, it is inadequate because it would be far too cheap.

If this seems paradoxical, it must be remembered that up to now all proposed social-welfare expenditures have had to be measured *within* the war economy, not as a replacement for it. The old slogan about a battleship or an

waste, debt, ito gain debt control over

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ICBM costing as much as x hospitals or y schools or z homes takes on a very different meaning if there are to be no more battleships or ICBM's.

Since the list is general, we have elected to forestall the tangential controversy that surrounds arbitrary cost projections by offering no individual cost estimates. But the maximum program that could be physically effected along the lines indicated could approach the established level of military spending only for a limited time—in our opinion, subject to a detailed cost-and-feasibility analysis, less than ten years. In this short period, at this rate, the major goals of the program would have been achieved. Its capital-investment phase would have been completed, and it would have established a permanent comparatively modest level of annual operating cost—within the framework of the general economy.

Here is the basic weakness of the social-welfare surrogate. On the short-term basis, a maximum program of this sort could replace a normal military spending program, provided it was designed, like the military model, to be subject to arbitrary control. Public housing starts, for example, or the development of modern medical centers might be accelerated or halted from time to time, as the requirements of a stable economy might dictate. But on the long-term basis, social-welfare spending, no matter how often redefined, would necessarily become an integral, accepted part of the economy, of no more value as a stabilizer than the automobile industry or old age and survivors' insurance. Apart from whatever merit social-welfare programs are deemed to have for their own sake, their fare programs are deemed to have for their own sake, their function as a substitute for war in the economy would thus be self-liquidating. They might serve, however, as expedients pending the development of more durable sub-

Make to create with
M... not for work

SUBSTITUTES FOR THE FUNCTIONS OF WAR 77
E... work

Space Research

stitute measures. Another economic surrogate that has been proposed is a series of giant "space-research" programs. These have already demonstrated their utility in more modest scale within the military economy. What has been implied, although not yet expressly put forth, is the development of a long-range sequence of space-research projects with largely unattainable goals. This kind of program offers several advantages lacking in the social-welfare model. First, it is unlikely to phase itself out, regardless of the predictable "surprises" science has in store for us: the universe is too big. In the event some individual project unexpectedly succeeds there would be no dearth of substitute problems. For example, if colonization of the moon proceeds on schedule, it could then become "necessary" to establish a beachhead on Mars or Jupiter, and so on. Second, it need be no more dependent on the general supply-demand economy than its military prototype. Third, it lends itself extraordinarily well to arbitrary control.

Space research can be viewed as the nearest modern equivalent yet devised to the pyramid-building, and similar ritualistic enterprises, of ancient societies. It is true that the scientific value of the space program, even of what has already been accomplished, is substantial on its own terms. But current programs are absurdly and obviously disproportionate, in the relationship of the knowledge sought to the expenditures committed. All but a small fraction of the space budget, measured by the standards of comparable scientific objectives, must be charged *de facto* to the military economy. Future space research, projected as a war surrogate, would further reduce the "scientific" rationale of its budget to a minuscule percentage indeed.

Not based on need, but greed

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improbable that a program of deliberate environmental poisoning could be implemented in a politically acceptable manner.

However unlikely some of the possible alternate enemies we have mentioned may seem, we must emphasize that one *must* be found, of credible quality and magnitude, if a transition to peace is ever to come about without social disintegration. It is more probable, in our judgment, that such a threat will have to be invented, rather than developed from unknown conditions. For this reason, we believe further speculation about its putative nature ill-advised in this context. Since there is considerable doubt, in our minds, that *any* viable political surrogate can be devised, we are reluctant to compromise, by premature discussion, any possible option that may eventually lie open to our government.

Sociological

Of the many functions of war we have found convenient to group together in this classification, two are critical. In a world of peace, the continuing stability of society will require: 1) an effective substitute for military institutions that can neutralize destabilizing social elements and 2) a credible motivational surrogate for war that can insure social cohesiveness. The first is an essential element of social control; the second is the basic mechanism for adapting individual human drives to the needs of society.

Most proposals that address themselves, explicitly or otherwise, to the postwar problem of controlling the socially alienated turn to some variant of the Peace Corps or the so-called Job Corps for a solution. The socially disaffected, the economically unprepared, the psychologically uncomfortable, the hard-core "delinquents," the incorrig-

This world peace is sumness
elimination of disorder needs of

ble "subversives," and the rest of the unemployable are seen as somehow transformed by the disciplines of a service modeled on military precedent into more or less dedicated social service workers. This presumption also informs the otherwise hardheaded ratiocination of the "Unarmed Forces" plan.

The problem has been addressed, in the language of popular sociology, by Secretary McNamara. "Even in our abundant societies, we have reason enough to worry over the tensions that coil and tighten among underprivileged young people, and finally flail out in delinquency and crime. What are we to expect . . . where mounting frustrations are likely to fester into eruptions of violence and extremism?" In a seemingly unrelated passage, he continues: "It seems to me that we could move toward remedying that inequity [of the Selective Service System] by asking every young person in the United States to give two years of service to his country—whether in one of the military services, in the Peace Corps, or in some other volunteer developmental work at home or abroad. We could encourage other countries to do the same." Here, as elsewhere throughout this significant speech, Mr. McNamara has focused, indirectly but unmistakably, on one of the key issues bearing on a possible transition to peace, and has later indicated, also indirectly, a rough approach to its resolution, again phrased in the language of the current war system.

It seems clear that Mr. McNamara and other proponents of the peace-corps surrogate for this war function lean heavily on the success of the paramilitary Depression programs mentioned in the last section. We find the precedent wholly inadequate in degree. Neither the lack of relevant precedent, however, nor the dubious social-welfare

Freedom, Disorder is required for liberty
No price of it

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sentimentality characterizing this approach warrant its rejection without careful study. It may be viable—provided, first, that the military origin of the Corps format be effectively rendered out of its operational activity, and second, that the transition from paramilitary activities to “developmental work” can be effected without regard to the attitudes of the Corps personnel or to the “value” of the work it is expected to perform.

Another possible surrogate for the control of potential enemies of society is the reintroduction, in some form consistent with modern technology and political processes, of slavery. Up to now, this has been suggested only in fiction, notably in the works of Wells, Huxley, Orwell, and others engaged in the imaginative anticipation of the sociology of the future. But the fantasies projected in *Brave New World* and 1984 have seemed less and less implausible over the years, since their publication. The traditional association of slavery with ancient preindustrial cultures should not blind us to its adaptability to advanced forms of social organization, nor should its equally traditional incompatibility with Western moral and economic values. It is entirely possible that the development of a sophisticated form of slavery may be an absolute prerequisite for social control in a world at peace. As a practical matter, conversion of the code of military discipline to a euphemized form of enslavement would entail surprisingly little revision; the logical first step would be the adoption of some form of “universal” military service.

When it comes to postulating a credible substitute for war capable of directing human behavior patterns in behalf of social organization, few options suggest themselves. Like its political function, the motivational function of war requires the existence of a genuinely menacing

social enemy. The principal difference is that for purposes of motivating basic allegiance, as distinct from accepting political authority, the “alternate enemy” must imply a more immediate, tangible, and directly felt threat of destruction. It must justify the need for taking and paying a “blood price” in wide areas of human concern.

In this respect, the possible substitute enemies noted earlier would be insufficient. One exception might be the environmental-pollution model, if the danger to society it posed was genuinely imminent. The fictive models would have to carry the weight of extraordinary conviction, underscored with a not inconsiderable actual sacrifice of life: the construction of an up-to-date mythological or religious structure for this purpose would present difficulties in our era, but must certainly be considered.

Games theorists have suggested, in other contexts, the development of “blood games” for the effective control of individual aggressive impulses. It is an ironic commentary on the current state of war and peace studies that it was left not to scientists but to the makers of a commercial film⁸ to develop a model for this notion, on the implausible level of popular melodrama, as a ritualized manhunt. More realistically, such a ritual might be socialized, in the manner of the Spanish Inquisition and the less formal witch trials of other periods, for purposes of “social purification,” “state security,” or other rationale both acceptable and credible to postwar societies. The feasibility of such an updated version of still another ancient institution, though doubtful, is considerably less fanciful than the wishful notion of many peace planners that a lasting condition of peace can be brought about without the most painstaking examination of every possible surrogate for the essential

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functions of war. What is involved here, in a sense, is the quest for William James's "moral equivalent of war."

It is also possible that the two functions considered under this heading may be jointly served, in the sense of establishing the antisocial, for whom a control institution is needed, as the "alternate enemy" needed to hold society together. The relentless and irreversible advance of unemployment at all levels of society, and the similar extension of generalized alienation from accepted values⁹ may make some such program necessary even as an adjunct to the war system. As before, we will not speculate on the specific forms this kind of program might take, except to note that there is again ample precedent, in the treatment meted out to disfavored, allegedly menacing, ethnic groups in certain societies during certain historical periods.¹⁰

Ecological

Considering the shortcomings of war as a mechanism of selective population control, it might appear that devising substitutes for this function should be comparatively simple. Schematically this is so, but the problem of timing the transition to a new ecological balancing device makes the feasibility of substitution less certain.

It must be remembered that the limitation of war in this function is entirely eugenic. War has not been genetically progressive. But as a system of gross population control to preserve the species it cannot fairly be faulted. And, as has been pointed out, the nature of war is itself in transition. Current trends in warfare—the increased strategic bombing of civilians and the greater military importance now attached to the destruction of sources of supply (as opposed to purely "military" bases and personnel)—strongly suggest that a truly qualitative improvement is in

eliminate it

Dispute

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the making. Assuming the war system is to continue, it is more than probable that the regressively selective quality of war will have been reversed, as its victims become more genetically representative of their societies.

There is no question but that a universal requirement that procreation be limited to the products of artificial insemination would provide a fully adequate substitute control for population levels. Such a reproductive system would, of course, have the added advantage of being susceptible of direct eugenic management. Its predictable further development—conception and embryonic growth taking place wholly under laboratory conditions—would extend these controls to their logical conclusion. The ecological function of war under these circumstances would not only be superseded but surpassed in effectiveness.

The indicated intermediate step—total control of conception with a variant of the ubiquitous "pill," via water supplies or certain essential foodstuffs, offset by a controlled "antidote"—is already under development.¹¹ There would appear to be no foreseeable need to revert to any of the outmoded practices referred to in the previous section (infanticide, etc.) as there might have been if the possibility of transition to peace had arisen two generations ago.

The real question here, therefore, does not concern the viability of this war substitute, but the political problems involved in bringing it about. It cannot be established while the war system is still in effect. The reason for this is simple: excess population is war material. As long as any society must contemplate even a remote possibility of war, it must maintain a maximum supportable population, even when so doing critically aggravates an economic liability. This is paradoxical, in view of war's role in reducing excess population, but it is readily understood. War con-

This is offered as a possible way to reduce the population.

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trols the general population level, but the ecological interest of any single society lies in maintaining its hegemony vis-à-vis other societies. The obvious analogy can be seen in any free-enterprise economy. Practices damaging to the society as a whole—both competitive and monopolistic—are abetted by the conflicting economic motives of individual capital interests. The obvious precedent can be found in the seemingly irrational political difficulties which have blocked universal adoption of simple birth-control methods. Nations desperately in need of increasing unfavorable production-consumption ratios are nevertheless unwilling to gamble their possible military requirements of twenty years hence for this purpose. Unilateral population control, as practiced in ancient Japan and in other isolated societies, is out of the question in today's world.

Since the eugenic solution cannot be achieved until the transition to the peace system takes place, why not wait? One must qualify the inclination to agree. As we noted earlier, a real possibility of an unprecedented global crisis of insufficiency exists today, which the war system may not be able to forestall. If this should come to pass before an agreed-upon transition to peace were completed, the result might be irrevocably disastrous. There is clearly no solution to this dilemma; it is a risk which must be taken. But it tends to support the view that if a decision is made to eliminate the war system, it were better done sooner than later.

Cultural and Scientific

Strictly speaking, the function of war as the determinant of cultural values and as the prime mover of scientific progress may not be critical in a world without war. Our criterion for the basic nonmilitary functions of war has

Brown

been: Are they necessary to the survival and stability of society? The absolute need for substitute cultural value-determinants and for the continued advance of scientific knowledge is not established. We believe it important, however, in behalf of those for whom these functions hold subjective significance, that it be known what they can reasonably expect in culture and science after a transition to peace.

So far as the creative arts are concerned, there is no reason to believe they would disappear, but only that they would change in character and relative social importance. The elimination of war would in due course deprive them of their principal conative force, but it would necessarily take some time for the effect of this withdrawal to be felt. During the transition, and perhaps for a generation thereafter, themes of sociomoral conflict inspired by the war system would be increasingly transferred to the idiom of purely personal sensibility. At the same time, a new aesthetic would have to develop. Whatever its name, form, or rationale, its function would be to express, in language appropriate to the new period, the once discredited philosophy that art exists for its own sake. This aesthetic would reject unequivocally the classic requirement of paramilitary conflict as the substantive content of great art. The eventual effect of the peace-world philosophy of art would be democratizing in the extreme, in the sense that a generally acknowledged subjectivity of artistic standards would equalize their new, content-free "values."

What may be expected to happen is that art would be reassigned the role it once played in a few primitive peace-oriented social systems. This was the function of pure decoration, entertainment, or play, entirely free of the burden of expressing the sociomoral values and conflicts of a war-

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oriented society. It is interesting that the groundwork for such a value-free aesthetic is already being laid today, in growing experimentation in art without content, perhaps in anticipation of a world without conflict. A cult has developed around a new kind of cultural determinism, 12 which proposes that the technological form of a cultural expression determines its values rather than does its ostensibly meaningful content. Its clear implication is that there is no "good" or "bad" art, only that which is appropriate to its (technological) times and that which is not. Its cultural effect has been to promote circumstantial constructions and unplanned expressions; it denies to art the relevance of sequential logic. Its significance in this context is that it provides a working model of one kind of value-free culture we might reasonably anticipate in a world at peace.

So far as science is concerned, it might appear at first glance that a giant space-research program, the most promising among the proposed economic surrogates for war, might also serve as the basic stimulator of scientific research. The lack of fundamental organized social conflict inherent in space work, however, would rule it out as an adequate motivational substitute for war when applied to "pure" science. But it could no doubt sustain the broad range of technological activity that a space budget of military dimensions would require. A similarly scaled social-welfare program could provide a comparable impetus to low-keyed technological advances, especially in medicine, rationalized construction methods, educational psychology, etc. The eugenic substitute for the ecological function of war would also require continuing research in certain areas of the life sciences.

Apart from these partial substitutes for war, it must be

Evil seeds

SUBSTITUTES FOR THE FUNCTIONS OF WAR 91

Kept in mind that the momentum given to scientific progress by the great wars of the past century, and even more by the anticipation of World War III, is intellectually and materially enormous. It is our finding that if the war system were to end tomorrow this momentum is so great that the pursuit of scientific knowledge could reasonably be expected to go forward without noticeable diminution for perhaps two decades. 13 It would then continue, at a progressively decreasing tempo, for at least another two decades before the "bank account" of today's unresolved problems would become exhausted. By the standards of the questions we have learned to ask today, there would no longer be anything worth knowing still unknown; we cannot conceive, by definition, of the scientific questions to ask once those we can now comprehend are answered.

This leads unavoidably to another matter: the intrinsic value of the unlimited search for knowledge. We of course offer no independent value judgments here, but it is germane to point out that a substantial minority of scientific opinion feels that search to be circumscribed in any case. This opinion is itself a factor in considering the need for a substitute for the scientific function of war. For the record, we must also take note of the precedent that during long periods of human history, often covering thousands of years, in which no intrinsic social value was assigned to scientific progress, stable societies did survive and flourish. Although this could not have been possible in the modern industrial world, we cannot be certain it may not again be true in a future world at peace.

SECTION 7

SUMMARY AND
CONCLUSIONS

The Nature of War

WAR IS NOT, as is widely assumed, primarily an instrument of policy utilized by nations to extend or defend their expressed political values or their economic interests. On the contrary, it is itself the principal basis of organization on which all modern societies are constructed. The common proximate cause of war is the apparent interference of one nation with the aspirations of another. But at the root of all ostensible differences of national interest lie the dynamic requirements of the war system itself for periodic armed conflict. Readiness for war characterizes contemporary social systems more broadly than their economic and political structures, which it subsumes.

Economic analyses of the anticipated problems of transition to peace have not recognized the broad preeminence of war in the definition of social systems. The same is true, with rare and only partial exceptions, of model disarmament "scenarios." For this reason, the value of this previous work is limited to the mechanical aspects of transition. Certain features of these models may perhaps be applicable to a real situation of conversion to peace; this will depend on their compatibility with a substantive, rather than a procedural, peace plan. Such a plan can be developed only from the premise of full understanding of the

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nature of the war system it proposes to abolish, which in turn presupposes detailed comprehension of the functions the war system performs for society. It will require the construction of a detailed and feasible system of substitutes for those functions that are necessary to the stability and survival of human societies.

The Functions of War

The visible, military function of war requires no education; it is not only obvious but also irrelevant to a transition to the condition of peace, in which it will by definition be superfluous. It is also subsidiary in social significance to the implied, nonmilitary functions of war; those critical to transition can be summarized in five principal groupings.

1. *Economic.* War has provided both ancient and modern societies with a dependable system for stabilizing and controlling national economies. No alternate method of control has yet been tested in a complex modern economy that has shown itself remotely comparable in scope or effectiveness.

2. *Political.* The permanent possibility of war is the foundation for stable government; it supplies the basis for general acceptance of political authority. It has enabled societies to maintain necessary class distinctions, and it has ensured the subordination of the citizen to the state, by virtue of the residual war powers inherent in the concept of nationhood. No modern political ruling group has successfully controlled its constituency after failing to sustain the continuing credibility of an external threat of war.

3. *Sociological.* War, through the medium of military institutions, has uniquely served societies, throughout the course of known history, as an indispensable controller of dangerous social dissidence and destructive antisocial ten-

Free will depresses only to those who make
 seek for comfort
 care for others
 95
 757 of 771

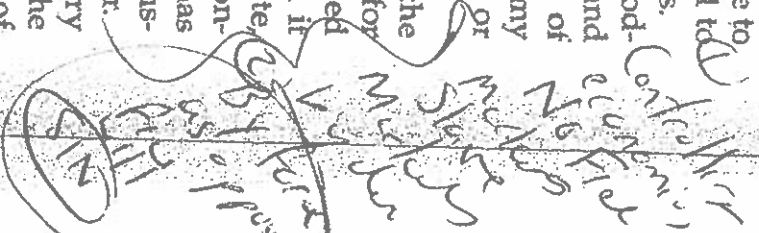
dencies. As the most formidable of threats to life itself, and by as the only one susceptible to mitigation by social organization alone, it has played another equally fundamental role: the war system has provided the machinery through which the motivational forces governing human behavior have been translated into binding social allegiance. It has thus ensured the degree of social cohesion necessary to the viability of nations. No other institution, or groups of institutions, in modern societies, has successfully served these functions.

4. *Ecological.* War has been the principal evolutionary device for maintaining a satisfactory ecological balance between gross human population and supplies available for its survival. It is unique to the human species. *People are the*

5. *Cultural and Scientific.* War-orientation has determined the basic standards of value in the creative arts, and has provided the fundamental motivational source of scientific and technological progress. The concepts that the arts express values independent of their own forms and that the successful pursuit of knowledge has intrinsic social value have long been accepted in modern societies; the development of the arts and sciences during this period has been corollary to the parallel development of weaponry. *I hate standards that don't*

Substitutes for the Functions of War: Criteria
 The foregoing functions of war are essential to the survival of the social systems we know today. With two possible exceptions they are also essential to any kind of stable social organization that might survive in a warless world. Discussion of the ways and means of transition to such a world are meaningless unless a) substitute institutions can be devised to fill these functions, or b) it can reasonably be

*Free speech, beautiful
 discourse that helps us
 ideas, ideas, ideas
 ideas, ideas, ideas
 ideas, ideas, ideas*



Free will

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THE REPORT

hypothesized that the loss or partial loss of any one function need not destroy the viability of future societies.

Such substitute institutions and hypotheses must meet varying criteria. In general, they must be technically feasible, politically acceptable, and potentially credible to the members of the societies that adopt them. Specifically, they must be characterized as follows:

1. *Economic.* An acceptable economic surrogate for the war system will require the expenditure of resources for completely nonproductive purposes at a level comparable to that of the military expenditures otherwise demanded by the size and complexity of each society. Such a substitute system of apparent "waste" must be of a nature that will permit it to remain independent of the normal supply-demand economy; it must be subject to arbitrary political control.

2. *Political.* A viable political substitute for war must posit a generalized external menace to each society of a nature and degree sufficient to require the organization and acceptance of political authority.

3. *Sociological.* First, in the permanent absence of war, new institutions must be developed that will effectively control the socially destructive segments of societies. Second, for purposes of adapting the physical and psychological dynamics of human behavior to the needs of social organization, a credible substitute for war must generate an omnipresent and readily understood fear of personal destruction. This fear must be of a nature and degree sufficient to ensure adherence to societal values to the full extent that they are acknowledged to transcend the value of individual human life.

4. *Ecological.* A substitute for war in its function as the uniquely human system of population control must ensure

2. issue damp but the... is causing who believe this

97 SUMMARY AND CONCLUSIONS
Eugenics is Evolution
Mankind is...
Mankind is...
Mankind is...

the survival, if not necessarily the improvement, of the species, in terms of its relation to environmental supply.

5. *Cultural and Scientific.* A surrogate for the function of war as the determinant of cultural values must establish a basis of sociomoral conflict of equally compelling force and scope. A substitute motivational basis for the quest for scientific knowledge must be similarly informed by a comparable sense of internal necessity.

Substitutes for the Functions of War: Models

The following substitute institutions, among others, have been proposed for consideration as replacements for the nonmilitary functions of war. That they may not have been originally set forth for that purpose does not preclude or invalidate their possible application here.

1. *Economic.* (a) A comprehensive social-welfare program, directed toward maximum improvement of general conditions of human life. (b) A giant open-end space-research program, aimed at unreachable targets. (c) A permanent, ritualized, ultra-elaborate disarmament inspection system, and variants of such a system.

2. *Political.* (a) An omnipresent, virtually omnipotent international police force. (b) An established and recognized extraterrestrial menace. (c) Massive global environmental pollution. (d) Fictitious alternate enemies.

3. *Sociological: Control function.* (a) Programs generally derived from the Peace Corps model. (b) A modern, sophisticated form of slavery. *Motivational function.* (a) Intensified environmental pollution. (b) New religions or other mythologies. (c) Socially oriented blood games. (d) Combination forms.

4. *Ecological.* A comprehensive program of applied eugenics.

Waste by...
Made up follows in

5. *Cultural.* No replacement institution offered. *Scientific.* The secondary requirements of the space-research, social-welfare, and/or eugenics programs.

Substitutes for the Functions of War: Evaluation

The models listed above reflect only the beginning of the quest for substitute institutions for the functions of war, rather than a recapitulation of alternatives. It would be both premature and inappropriate, therefore, to offer final judgments on their applicability to a transition to peace and after. Furthermore, since the necessary but complex project of correlating the compatibility of proposed surrogates for different functions could be treated only in exemplary fashion at this time, we have elected to withhold such hypothetical correlations as were tested as statistically inadequate.¹

Nevertheless, some tentative and cursory comments on these proposed functional "solutions" will indicate the scope of the difficulties involved in this area of peace planning.

Economic. The social-welfare model cannot be expected to remain outside the normal economy after the conclusion of its predominantly capital-investment phase; its value in this function can therefore be only temporary. The space-research substitute appears to meet both major criteria, and should be examined in greater detail, especially in respect to its probable effects on other war functions. "Elaborate inspection" schemes, although superficially attractive, are inconsistent with the basic premise of transition to peace. The "unarmed forces" variant, logistically similar, is subject to the same functional criticism as the general social-welfare model.
Political. Like the inspection-scheme surrogates, pro-

Social context note

SUMMARY AND CONCLUSIONS

possals for plenipotentiary international police are inherently incompatible with the ending of the war system. The "unarmed forces" variant, amended to include unlimited powers of economic sanction, might conceivably be expanded to constitute a credible external menace. Development of an acceptable threat from "outer space," presumably in conjunction with a space-research surrogate for economic control, appears unpromising in terms of credibility. The environmental-pollution model does not seem sufficiently responsive to immediate social control, except through arbitrary acceleration of current pollution trends; this in turn raises questions of political acceptability. New, less regressive, approaches to the creation of fictitious global "enemies" invite further investigation.

Sociological: Control function. Although the various substitutes proposed for this function that are modeled roughly on the Peace Corps appear grossly inadequate in potential scope, they should not be ruled out without further study. Slavery in a technologically modern and conceptually euphemized form, may prove a more efficient and flexible institution in this area. *Motivational function.* Although none of the proposed substitutes for war as the guarantor of social allegiance can be dismissed out of hand, each presents serious and special difficulties. Intensified environmental threats may raise ecological dangers; my thinking dissociated from war may no longer be politically feasible; purposeful blood games and rituals can far more readily be devised than implemented. An institution combining this function with the preceding one, based on, but not necessarily imitative of, the precedent of organized ethnic repression, warrants careful consideration.

Ecological. The only apparent problem in the application of an adequate eugenic substitute for war is that of

This is Stefan, well.

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timing; it cannot be effectuated until the transition to peace has been completed, which involves a serious temporary risk of ecological failure.

Cultural. No plausible substitute for this function of war has yet been proposed. It may be, however, that a basic cultural value-determinant is not necessary to the survival of a stable society. Scientific. The same might be said for the function of war as the prime mover of the search for knowledge. However, adoption of either a giant space-research program, a comprehensive social-welfare program, or a master program of eugenic control would provide motivation for limited technologies.

General Conclusions

It is apparent, from the foregoing, that no program or combination of programs yet proposed for a transition to peace has remotely approached meeting the comprehensive functional requirements of a world without war.

Although one projected system for filling the economic function of war seems promising, similar optimism cannot be expressed in the equally essential political and sociological areas. The other major nonmilitary functions of war—ecological, cultural, scientific—raise very different problems, but it is at least possible that detailed programming of substitutes in these areas is not prerequisite to transition. More important, it is not enough to develop adequate but separate surrogates for the major war functions; they must be fully compatible and in no degree self-canceling.

Until such a unified program is developed, at least hypothetically, it is impossible for this or any other group to furnish meaningful answers to the questions originally presented to us. When asked how best to prepare for the advent of peace, we must first reply, as strongly as we can,

Review by elimination of fire bombs
The wicked order first prevents

Jesse says he did not come for peace
The summary is the opposite of protecting people, people's lives will need to escape hell. (frowny face)

SUMMARY AND CONCLUSIONS

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that the war system cannot responsibly be allowed to disappear until 1) we know exactly what it is we plan to put in its place, and 2) we are certain, beyond reasonable doubt, that these substitute institutions will serve their purposes in terms of the survival and stability of society. It will then be time enough to develop methods for effectuating the transition; procedural programming must follow, not precede, substantive solutions.

Such solutions, if indeed they exist, will not be arrived at without a revolutionary revision of the modes of thought heretofore considered appropriate to peace research. That we have examined the fundamental questions involved from a dispassionate, value-free point of view should not imply that we do not appreciate the intellectual and emotional difficulties that must be overcome on all decision-making levels before these questions are generally acknowledged by others for what they are. They reflect, on an intellectual level, traditional emotional resistance to new (more lethal and thus more "shocking") forms of weaponry. The understated comment of then-Senator Hubert Humphrey on the publication of *On Thermonuclear War* is still very much to the point: "New thoughts, particularly those which appear to contradict current assumptions, are always painful for the mind to contemplate."

Nor, simply because we have not discussed them, do we minimize the massive reconciliation of conflicting interests which domestic as well as international agreement on proceeding toward genuine peace presupposes. This factor was excluded from the purview of our assignment, but we would be remiss if we failed to take it into account. Although no insuperable obstacle lies in the path of reaching such general agreements, formidable short-

disorder needs to cut off SW.

THE REPORT

of alternate ways and means to serve the current functions of war is narrowly political. It is possible that one or more major sovereign nations may arrive, through ambiguous leadership, at a position in which a ruling administrative class may lose control of basic public opinion or of its ability to rationalize a desired war. It is not hard to imagine, in such circumstance, a situation in which such governments may feel forced to initiate serious full-scale disarmament proceedings (perhaps provoked by "accidental" nuclear explosions), and that such negotiations may lead to the actual disestablishment of military institutions. As our Report has made clear, this could be catastrophic. It seems evident that, in the event an important part of the world is suddenly plunged without sufficient warning into an inadvertent peace, even partial and inadequate preparation for the possibility may be better than none. The difference could even be critical. The models considered in the preceding chapter, both those that seem promising and those that do not, have one positive feature in common—an inherent flexibility of phrasing. And despite our strictures against knowingly proceeding into peace-transition procedures without thorough substantive preparation, our government must nevertheless be ready to move in this direction with whatever limited resources of planning are on hand at the time—if circumstances so require. An arbitrary all-or-nothing approach is no more realistic in the development of contingency peace programming than it is anywhere else.

But the principal cause for concern over the continuing effectiveness of the war system, and the more important reason for hedging with peace planning, lies in the backwardness of current war-system programming. Its controls have not kept pace with the technological advances it has

Waste & of direction

SUMMARY AND CONCLUSIONS

made possible. Despite its unarguable success to date, even in this era of unprecedented potential in mass destruction, it continues to operate largely on a laissez-faire basis. To the best of our knowledge, no serious quantified studies have ever been conducted to determine, for example:

- optimum levels of armament production, for purposes of economic control, at any given series of chronological points and under any given relationship between civilian production and consumption patterns;
- correlation factors between draft recruitment policies and measurable social dissidence;
- minimum levels of population destruction necessary to maintain war-threat credibility under varying political conditions;
- optimum cyclical frequency of "shooting" wars under varying circumstances of historical relationship.

These and other war-function factors are fully susceptible to analysis by today's computer-based systems,³ but they have not been so treated; modern analytical techniques have up to now been relegated to such aspects of the ostensible functions of war as procurement, personnel deployment, weapons analysis, and the like. We do not disparage these types of application, but only deplore their lack of utilization to greater capacity in attacking problems of broader scope. Our concern for efficiency in this context is not aesthetic, economic, or humanistic. It stems from the axiom that no system can long survive at either input or output levels that consistently or substan-

Handwritten marks: a circle around "shooting" wars and a larger circle around "minimum levels of population destruction"

Appendix OO

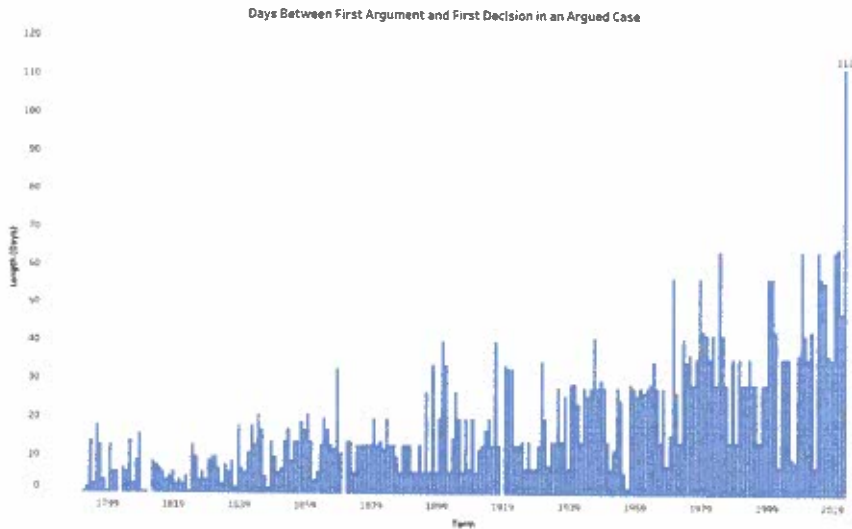
Supreme Court is Less Efficient

Posted by DR. ADAM FELDMAN on JANUARY 23, 2023

The Supreme Court is now less efficient according to multiple measures. Since the Court released its first decision in an orally argued case this morning, Monday January 23rd 2023, the 112 days between the first oral argument and the first opinion of this term set a new record for the longest time this has ever taken the justices. It's not only an aberration that the Court took 112 days to release an opinion, but also that it took 112 days to release a unanimous decision in Arellano (a predictable first opinion of the term) since the Court should have moved more swiftly especially without any separate opinions.

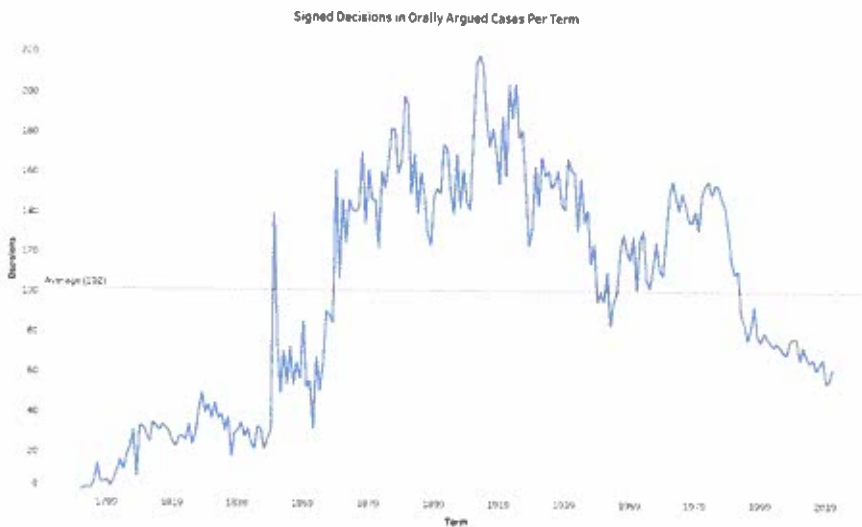
Now that the the Court released its Investigative Report regarding the Dobbs leak with a follow up from Marshal Gail Curley stating that the justices were questioned but were not asked to sign affidavits, we can surmise that this process hampered the Court's ability or at least slowed down the process of releasing an opinion.

If we look all the way back to 1791 though the Court has never taken anywhere near as long to release its first opinion in an argued case. Although defining the Court's first argument in a term is tricky in the Court's earlier years due to a more haphazard argument schedule, if we track the first argument by looking at the first that is in a sequence of multiple days with arguments then the graph since 1791 looks as follows.

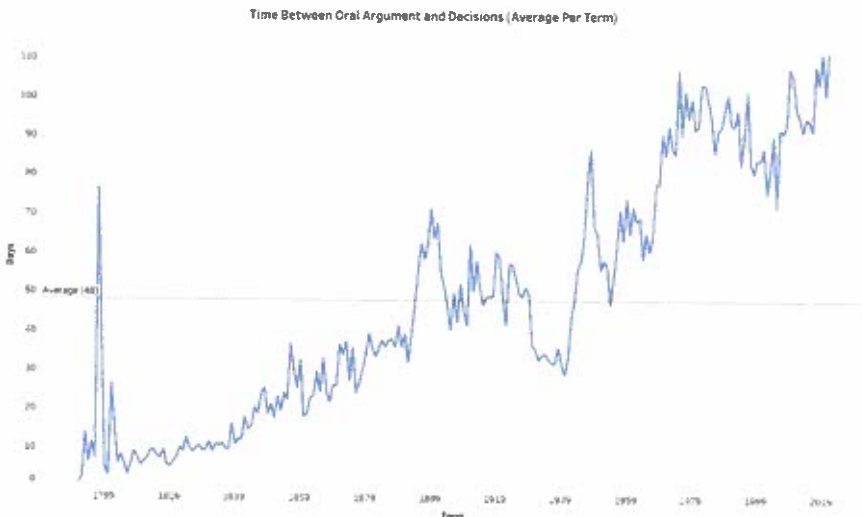


The Court was never previously close to this 112 days marker that it took this term to release its first opinion.

Other metrics also point to the Court's less efficient process. Even though the Court did not have fewer signed opinions in argued cases last term than it had in the few terms previous to it, the Court still issued almost 40 fewer opinions last term than it has averaged across its history. If you add to this that the Court heard many fewer cases closer to its inception and focus on the 20th century forward, than this difference from the average is even more pronounced. Looking through the end of last term the number of opinions issued in argued cases looks as follows:



Finally, the Court is taking longer intervals between oral arguments and decisions on average. If we look at the average time between arguments and decisions per term you will see the increase in the number of days over time.



Sure, one might argue that the Court now issues more separate opinions

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Disciplinary Counsel Patricia B. Swartz, Disciplinary Counsel Kathleen M. Vavala;
David A. White, Chief Disciplinary Counsel, Office of Disciplinary Counsel, Board on
Professional Responsibility of the Supreme Court of the State of Delaware, Preliminary
Investigatory Committee, Attorney General Delaware

**Certificate of Service of
Appellant Plaintiff Meghan Kelly’s Petition for Writ of Certiorari before judgment
pursuant to 28 U.S.C. § 2101 (e) to the United States Court of Appeals for the Third
Circuit, Case Number Case Numbers 22-8037 and 22-2079 to vacate a denial of a
stay pending this Honorable Court’s determination or denial of writ of certiorari of
before the Third Circuit Reciprocal Disciplinary Case and the Delaware
Disciplinary case and
Petitioner Meghan Kelly’s Motion for Leave to file in Forma Pauperis her On
Petition for Writ of Certiorari before judgment on Third Circuit Court of Appeals
Case Numbers 21-3198 and 22-2079**

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on February 6
2023, I had a true and correct copy of the above referenced document sent to all
Defendants through their attorneys,

Zi-Xiang Shen and Canceel Radinson-Blasucci
Delaware Department of Justice
Carvel State Building 820 N. French St, 6th Floor
Wilmington, DE 19801, served via E-filing, and to

Dated February 6, 2023

Respectfully submitted,
/s/Meghan Kelly *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 under the penalty of perjury.

Dated: February 6, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

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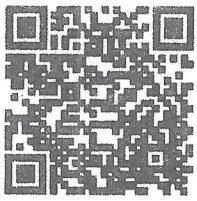
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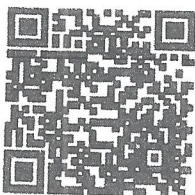
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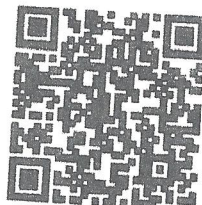
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or call 1-800-410-7420.

UFN: 091430-0939
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Clerk: 06



DAGSBORO
 28290 CLAYTON ST
 DAGSBORO, DE 19939-9998
 (800)275-8777

02/06/2023 10:05 AM

Product	Qty	Unit Price	Price
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Priority Mail®	1		\$17.10
Med FR Box			
Washington, DC 20543			
Flat Rate			
Expected Delivery Date			
Wed 02/08/2023			
Tracking #:			
9505 5153 8866 3037 4002 04			
Insurance			\$0.00
Up to \$100.00 included			
Affixed Postage			-\$2.52
Affixed Amount: \$2.52			
Total			\$14.58

10

Priority Mail®	1		\$17.10
Med FR Box			
Washington, DC 20543			
Flat Rate			
Expected Delivery Date			
Wed 02/08/2023			
Tracking #:			
9505 5153 8866 3037 4002 11			
Insurance			\$0.00
Up to \$100.00 included			
Affixed Postage			-\$17.01
Affixed Amount: \$17.01			
Total			\$0.09

11

Priority Mail®	1		\$17.10
Med FR Box			
Wilmington, DE 19801			
Flat Rate			
Expected Delivery Date			
Tue 02/07/2023			
Tracking #:			
9505 5153 8866 3037 4002 28			
Insurance			\$0.00
Up to \$100.00 included			
Affixed Postage			-\$8.19
Affixed Amount: \$8.19			
Total			\$8.91

12

Priority Mail®	1		\$17.10
Med FR Box			
Wilmington, DE 19801			
Flat Rate			
Expected Delivery Date			
Tue 02/07/2023			
Tracking #:			
9505 5153 8866 3037 4002 35			
Insurance			\$0.00
Up to \$100.00 included			
Affixed Postage			-\$2.52
Affixed Amount: \$2.52			
Total			\$14.58

13

Grand Total:	\$38.16
Cash	\$40.16
Change	-\$2.00

*To two attorneys opposing counsel
 M.K.
 2/6/23*

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call

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
)	No.: 1:21-cv-01490-CFC
Defendants.)	

Certificate of Service Appellant Plaintiff Meghan Kelly’s Motion to stay the Proceeding until the conclusion of the appeal of this Court’s Order at 3DI 131 Order denying a stay. I further move the Court, for good cause for permission to file the “Reply to Opposing Counsel’s Brief” motion 30 days after the stay is lifted.

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on February 7, 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

Caneel Radinson-Blasucci
Delaware Department of Justice
Carvel State Building 820 N. French St. 6th Floor
Wilmington, DE 19801,

Dated February 7, 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 under the penalty of perjury.

Dated: February 7, 2023

Meghan Kelly
(printed)

Meghan Kelly
(signed)